

September 14, 2026

Brett Bache (RI), Chair
NAIC Market Conduct Examination Guidelines (D) Working Group
c/o Petra Wallace, Senior Market Regulation Specialist
Via email pwallace@naic.org

Re: Proposed Revisions to Market Regulation Handbook Chapter 20- General Examination Standards

Dear Chair Bache and Members of the Working Group,

The National Association of Mutual insurance Companies (NAMIC) and the American Property Casualty Insurance Association (APCIA) appreciate the opportunity to comment on the proposed revisions to Chapter 20- General Examination Standards of the NAIC Market Regulation Handbook.

NAMIC and APCIA recognize the NAIC's work on the Regulatory Guidance Document adopted by the Accelerated Underwriting (A) Working Group and subsequently adopted by the Life Insurance and Annuities (A) Committee at the 2024 NAIC Summer National Meeting. We support clear, appropriately tailored guidance for market conduct examiners reviewing life insurers' accelerated underwriting practices.

However, we respectfully recommend that this guidance be removed from Chapter 20 and instead be included in Chapter 23, Life Insurance Examination Standards. This placement would better align the guidance with its regulatory origin, subject matter, and intended application.

Chapter 20 is designed to establish examination standards relevant across nearly all regulated entities and lines of business, while Chapters 21 through 32 address standards specific to particular product lines and specialized entities. The accelerated underwriting guidance is focused on life insurance underwriting practices and was developed and adopted through NAIC life insurance and annuity policymaking processes. It is therefore more appropriately situated in the handbook's life insurance examination chapter.

Including the guidance in Chapter 20 could create uncertainty as to whether life-insurance-specific examination expectations are intended to apply to property/casualty insurers and other regulated entities. Moreover, Chapter 20 already provides examiners with a broad framework for evaluating underwriting and rating practices under applicable state law. It directs examiners to review underwriting guidelines, manuals, related records, and insurer compliance with their own standards, as well as potential unfair-discrimination issues. These generally applicable standards should remain distinct from specialized guidance developed for life insurance accelerated underwriting.

Accordingly, NAMIC and APCIA respectfully request that the NAIC relocate the proposed accelerated-underwriting market conduct examiner guidance from Chapter 20 to Chapter 23. Doing so would preserve the intended cross-line nature of Chapter 20, ensure that the guidance is clearly limited to its appropriate life insurance context, and support more focused and efficient market conduct examinations.



NAMIC & APCIA 9-14-26 Joint Comment Letter

Thank you for your consideration. We welcome the opportunity to discuss these comments further.

Respectfully Submitted,

Lisa Brown, JD, MCM
Assistant Vice President
Market Conduct and Counsel
APCIA

Erica Weyhenmeyer, CPCU, AIE, MCM, WCP
Senior Policy Vice President
Market Regulation & Workers' Compensation
NAMIC