September 14, 2026

The Honorable French Hill
Chairman
House Financial Services Committee
Washington, DC 20515

The Honorable Maxine Waters
Ranking Member
House Financial Services Committee
Washington, DC 20515

Re: Support for Inclusion of the Business of Insurance Regulatory Reform Act in the Committee's CFPB Legislative Package

Dear Chairman Hill and Ranking Member Waters:

On behalf of the National Association of Insurance Commissioners (NAIC),[1] we write to express our support for the inclusion of the *Business of Insurance Regulatory Reform Act* in the Committee's legislative package to reform the Consumer Financial Protection Bureau (CFPB).

Consumer protection is the hallmark of our national state-based insurance regulatory system. That is why Congress has repeatedly reaffirmed the states' role in overseeing the insurance sector, including most recently in the Dodd-Frank Act. While the Dodd-Frank Act contains an exception to CFPB authority with respect to entities regulated by state insurance regulators, this legislation would make this exception more explicit and further effectuate congressional intent to defer to the states with respect to insurance policyholder protection.

We are proud of our track record in uncovering abuses and wrongful behavior in the insurance sector. Given the interconnected nature of our financial sector and the relative newness of the CFPB, it is understandable that some unintended overlap or duplication of effort with other regulators can occur. For that reason, it is appropriate for Congress to assess the operationalization of a new agency like the CFPB to clarify the scope of its authority and minimize redundancies or confusion such that both the states and the CFPB can focus on their respective areas of responsibility. *The Business of Insurance Regulatory Reform Act* provides important clarifications to the existing statute and helps mitigate these concerns.

[1] As part of our state-based system of insurance regulation in the United States, the National Association of Insurance Commissioners (NAIC) provides expertise, data, and analysis for insurance commissioners to effectively regulate the industry and protect consumers. The U.S. standard-setting organization is governed by the chief insurance regulators from the 50 states, the District of Columbia and five U.S. territories. Through the NAIC, state insurance regulators establish standards and best practices, conduct peer reviews, and coordinate regulatory oversight. NAIC staff supports these efforts and represents the collective views of state regulators domestically and internationally. For more information, visit www.naic.org.

We therefore respectfully support retaining the Business of Insurance Regulatory Reform Act in the legislative package to reform CFPB considered by the Committee at markup.[2] We appreciate the Committee's attention to preserving the longstanding authority of state insurance regulators and look forward to continuing to work with you as the legislation advances.

Sincerely,

Scott White
NAIC President
Commissioner
Virginia Bureau of Insurance

Elizabeth Kelleher Dwyer
NAIC President-Elect
Director
Rhode Island Department of Business Regulation

Jon Pike
NAIC Vice President
Commissioner
Utah Insurance Department

Michael Wise
NAIC Secretary-Treasurer
Director
South Carolina Department of Insurance

[2] SEC. 205 CLARIFICATION TO THE AUTHORITY OF THE BUREAU WITH RESPECT TO PERSONS REGULATED BY A STATE INSURANCE REGULATOR.