



March 17, 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: Opposition to Discussion Draft to Make Improvements to Title V of the Gramm-Leach-Bliley Act

Dear Chairman Hill and Ranking Member Waters:

On behalf of the National Association of Insurance Commissioners (NAIC)¹, we write in opposition to the discussion draft noticed for tomorrow's hearing, "Updating America's Financial Privacy Framework for the 21st Century." We appreciate the Committee's attention to consumer financial privacy and support the draft's clear recognition that state insurance authorities must continue to retain enforcement authority. At the same time, we strongly oppose the bill's broad preemption of State privacy and security laws as applied to the insurance sector.

State insurance regulators have built substantial expertise protecting consumers' financial, health, and other sensitive information in the insurance marketplace. For decades, states have implemented and enforced insurance-specific privacy and data security requirements consistent with the Gramm-Leach-Bliley Act, while continuing to update those protections to reflect evolving technology, cyber risks, and consumer expectations. This state-based framework is not theoretical. It is the system that regulators use every day to examine insurers, respond to incidents, and hold entities accountable.

Every state has adopted the NAIC's Privacy of Consumer Financial and Health Information Regulation (Model #672), which was drafted in direct response to GLBA requirements and governs how insurers collect, use, and disclose consumers' financial and health information. On the data security side, the NAIC adopted the Insurance Data Security Model Law (Model #668) in 2017 to address evolving cyber risks, and states continue to adopt and implement this law. The NAIC's Privacy Protections Working Group is currently reviewing Model #672 to keep

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.



pace with technological advancements and the proliferation of data collection in the digital era.²

Nothing about the data insurers collect, use, or disclose justifies sweeping federal preemption. Insurance products, underwriting, claims handling, fraud prevention, and servicing operate within a long-established State regulatory structure that already addresses the treatment and protection of consumer information. A one-size-fits-all federal override would displace proven protections without identifying any insurance-specific gap that states have failed to address. Federal standards may provide a floor, but they should not wipe away the authority of State insurance regulators to maintain and improve protections tailored to the insurance sector.

If Congress nevertheless advances this legislation, preserving State insurance enforcement is essential. There is no credible alternative enforcement mechanism for the insurance marketplace beyond the State officials who regulate insurers directly. We therefore appreciate that the discussion draft expressly preserves the authority of State insurance authorities to enforce Title V and to adopt implementing regulations in a manner consistent and comparable with Federal rules. That protection is important and should be retained in any final legislation.

Thank you for your attention to this important matter. We look forward to continuing to work with the Committee on policies that strengthen consumer privacy without undermining the State-based system of insurance regulation.

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
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² Nat'l Ass'n of Ins. Comm'rs, Privacy Protections (H) Working Group,
<https://content.naic.org/committees/h/privacy-protections-wg>