



July 28, 2023

Privacy Protections (H) Working Group  
National Association of Insurance Commissioners  
c/o Ms. Lois Alexander  
1100 Walnut Street, Suite 1500  
Kansas City, MO 64106  
Via email to [LAlexander@naic.org](mailto:LAlexander@naic.org)

RE: Privacy Protections Working Group Drafting Pod – Amended Provisions of Model #674

Dear Ms. Alexander:

I am writing on behalf of the National Insurance Crime Bureau (“NICB”) to address concerns with the National Association of Insurance Commissioners’ (NAIC) Privacy Protections Working Group (PPWG) Drafting Pod’s amended provisions of draft Model #674. This letter follows NICB’s April 3 and July 10 letters regarding draft Model #674.

NICB continues to have concerns with the revised draft Model #674 for the reasons stated in our previous letters. This past legislative session, seven additional states passed consumer data privacy laws that included entity-level exemptions for NICB. That brings the total number of states having enacted consumer data privacy statutes with specific NICB exemptions to ten. It would be inconsistent with those state laws for the NAIC model not to include a similar exemption in order to fight insurance crime and fraud, and for all the reasons stated in our letters.

We appreciate PPWG’s engagement with NICB to date and look forward to further discussions.

We appreciate your consideration of our concerns. If you have any questions or need additional information, please contact me at [rdizinno@nicb.org](mailto:rdizinno@nicb.org) or 703.216.0994.

Respectfully,

/s/ Richard E. DiZinno

Richard E. DiZinno  
Vice President  
Strategy, Policy and Government Affairs  
National Insurance Crime Bureau