

Tracking of NAIC Consumer Representatives' Requests
Process Established May 8, 2013

1. From time to time, NAIC consumer representatives bring issues to the NAIC/Consumer Liaison Committee during NAIC national meetings.
2. If a consumer representative is requesting specific action by the NAIC, an "NAIC Consumer Liaison Representative Recommendation to the NAIC Executive (EX) Committee" request form with the specific action noted should be submitted to the NAIC. This request form should also be included as part of the presentation slides and handouts provided to the NAIC/Consumer Liaison Committee within thirty (30) days, or as soon as practical, after the presentation. (request form attached)
3. All requests will be provided to the Consumer Board of Trustees by the NAIC staff support for the NAIC/Consumer Liaison Committee. The Consumer Board of Trustees will review the requests for informational purposes and will serve as a central point for the tracking and communication of requests within the NAIC.
4. The NAIC staff support for the NAIC/Consumer Liaison Committee will coordinate with the NAIC staff support for the appropriate referral committee to obtain its feedback on the request.
5. The NAIC staff support for the NAIC/Consumer Liaison Committee will provide this feedback to the chair of the Consumer Board of Trustees and the chair of the NAIC/Consumer Liaison Committee within thirty (30) days, or as soon as practical, after receiving the consumer representative request during an NAIC national meeting.
6. The chair of the NAIC/Consumer Liaison Committee and the chair of the Consumer Board of Trustees will review the feedback and provide input to the NAIC Executive (EX) Committee, as may be appropriate.
7. For any request for an amended or new charge, no further action will be taken unless an amended or new charge is adopted by the NAIC Executive (EX) Committee and Plenary. The NAIC (EX) Executive Committee may pursue any action consistent with the NAIC Bylaws.
8. An update on the status of the NAIC consumer representatives' requests will be posted on the NAIC website and provided at each NAIC national meeting during the NAIC/Consumer Liaison Committee meeting and the Consumer Board of Trustees' meeting.

Advisory Note

NAIC committees generally adopt their annual charges during the NAIC Fall National Meeting. The NAIC membership generally adopts its annual charges and sets the priorities for the year during or shortly after the NAIC Commissioners Conference in February.

Consumer representatives are encouraged to work within the normal committee process of the NAIC for the development and adoption of charges each year

NAIC CONSUMER LIAISON
REPRESENTATIVE RECOMMENDATION
TO THE NAIC EXECUTIVE (EX) COMMITTEE

RECOMMENDED BY: Brenda Cude, Amy Bach, Erica Eversman, Ken Klein, Brendan Bridgeland

ISSUE:

We often assume that a primary way consumers can understand their homeowners insurance coverage is by reviewing the language in their policy/contract. However, collectively the individuals listed above have realized that we have had very different experiences as insurance consumers in gaining access to our personal homeowners insurance policies. We also found no systematic review of insurer practices regarding making information about coverage available to their policyholders, either by giving them access to their policies or other methods. We could communicate much more clearly to homeowners insurance policyholders with a better understand of the range of ways in which they access information about their coverage as well as the challenges they may encounter in doing this.

COMMITTEE REFERRAL RECOMMENDATION:

(A)_____ (B)_____ (C)XX (D)_____ (E)_____ (F)_____ (G)_____ (H)_____

ACTION REQUESTED/CHARGE RECOMMENDED:

We are requesting a data call to ask property and casualty insurers about their policies and practices regarding providing coverage information to their insureds, including when and how policy language is available to their insureds.

NAIC ACTION:

RECOMMENDATION ACCEPTED: _____

RECOMMENDATION DECLINED: _____

STATUS:

NAIC CONSUMER LIAISON
REPRESENTATIVE RECOMMENDATION
TO THE NAIC EXECUTIVE (EX) COMMITTEE

RECOMMENDED BY: Deborah Steinberg, Lauren Finke, Laura Colbert, Shamus Durac, Jennifer Snow

DATE: July 25, 2025

ISSUE:

Protecting Access to Mental Health and Substance Use Disorder Care: Despite passage of the federal Mental Health Parity and Addiction Equity Act (MHPAEA) of 2008, as amended by the Consolidated Appropriations Act (CAA) of 2021 regulators continue to find pervasive discriminatory barriers to mental health (MH) and substance use disorder (SUD) benefits. As a result of the federal government's decision to "revisit" the 2024 regulations implementing the CAA, 2021, there is confusion among state regulators, carriers/issuers, and consumers about what protections continue to apply and what actions can be taken to address suspected or actual violations of MHPAEA. NAIC is in a unique position to provide this insight and clarity, which will help carriers/issuers comply with the law and ensure non-discriminatory access to MH and SUD care for consumers.

COMMITTEE REFERRAL RECOMMENDATION:

(A)_____ (B)X_____ (C)_____ (D)_____ (E)_____ (F)_____ (G)_____

ACTION REQUESTED/CHARGE RECOMMENDED:

We are proposing that the NAIC issue a model bulletin to carriers/issuers affirming the statutory obligations of MHPAEA (as well as any state parity laws), including the requirement that they continue to perform and document comparative analyses to show they are offering non-discriminatory MH and SUD benefits as compared to medical and surgical benefits, both as written and in operation. We recommend the NAIC identify and include best practices for these comparative analyses, including, but not limited to, regular reporting, evaluating outcomes data to assess parity compliance in operation, and designing and applying non-discriminatory coverage criteria and utilization management practices. The bulletin could also include a request that carriers/issuers affirm this obligation in enrollee documents and include information on how to submit complaints.

NAIC ACTION:

RECOMMENDATION ACCEPTED: _____

RECOMMENDATION DECLINED: _____