

Short Remarks from Michael DeLong In Support of Greater Transparency at NAIC Meetings

My name is Michael DeLong from the Consumer Federation of America, and I am one of the funded Consumer Representatives. I'd like to talk briefly about the need for greater transparency—specifically the improvement of stakeholder access to live NAIC public meetings and recordings of those meetings.

I think there should be free public access to livestreams and recordings of NAIC Executive Committee meetings, plenary sessions, task forces, working groups, in-person meetings and all other meetings designated as public.

Recordings of all public committee calls and in-person meetings should be available to all stakeholders online via the NAIC website. And there should be free live Webex access to all public in-person meeting sessions, as well as recordings.

Right now, the NAIC meetings are public meetings, but the only ways stakeholders can access them are to attend in-person or virtually at a substantial cost. If someone wanted to attend the public sessions at this (summer) conference virtually, it would cost them \$875. That's a considerable sum, and in-person travel to and attendance at the conference is a lot more expensive. When decisions are being made that shape insurance markets and consumer protections nationwide, the public should be able to observe those discussions without financial barriers.

Insurance regulation affects virtually every household and business in America, and the NAIC plays a central role in coordinating state insurance regulation and developing model laws and regulatory standards. While many of its meetings are designated as public, access to livestreams and recordings may require payment or be limited in availability. Eliminating these paywalls would:

1. Increase transparency in regulatory deliberations
2. Strengthen public trust in insurance oversight
3. Expand access for consumer groups, academics, journalists, and smaller insurers
4. Promote more equitable participation in policymaking

Transparency should not depend on the size of someone's budget or their income. Free access to public meetings is a basic expectation in modern governance. And federal agencies, state legislatures, and public commissions across the country routinely provide free livestreams and archived recordings of public proceedings. Advocates say the NAIC has an opportunity to demonstrate national leadership by adopting similar practices.

I urge the following recommendations:

1. All public NAIC meetings should be livestreamed at no cost
2. Recordings should be archived online and accessible without charge
3. Meeting materials should be posted in a timely manner
4. Reasonable registration controls should be maintained for security, but not payment requirements

I'd like to urge all NAIC committees, especially the Executive Committee, to direct staff to evaluate implementation logistics and present a plan within 60 days.

Please reach out to me at mdelong@consumerfed.org with any questions. Thank you!

Michael DeLong
925-708-1135
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Consumer Federation of America

March 20, 2026

Commissioner Scott White (VA), Chair
Executive Committee
c/o Cindy Catron
Via email ccatron@naic.org

Re: Public Hearing on the NAIC Policy Statement on Open Meetings

Dear Chair White and Member of the Executive Committee:

On behalf of the National Association of Mutual Insurance Companies (NAMIC)¹ and its member companies, we appreciate the opportunity to provide comments on the NAIC Policy Statement on Open Meetings (Revised: 4/01/2014). NAMIC and its members have long been strong supporters of the state-based system of insurance regulation. We believe that system is at its best when transparency, accountability, and stakeholder engagement are upheld as core principles. The NAIC's longstanding commitment to openness has historically distinguished it as a credible and effective standard-setting body, both domestically and internationally.

I. Transparency as a Foundation of State-Based Regulation

Transparency is fundamental to the continued strength and legitimacy of the NAIC and the broader state-based regulatory system. As noted in prior stakeholder communications, the NAIC's collaborative model has successfully fostered open dialogue, strengthened regulatory outcomes, and enhanced public confidence in the system. The NAIC's work is increasingly relied upon by state legislatures, federal policymakers, and international bodies, and in many cases is incorporated by reference into state law. In this context, maintaining robust and consistent transparency practices under the NAIC Policy Statement on Open Meetings (Revised: 4/01/2014) is essential to ensuring both the effectiveness and credibility of the organization's work.

II. Observations Regarding Current Practice

NAMIC members have observed that, in recent years, the application of the NAIC Policy Statement on Open Meetings (Revised: 4/01/2014) has appeared inconsistent. Specifically:

- There has been an increased reliance on regulator-to-regulator sessions
- Meeting notices and agendas do not always clearly identify the basis for closure
- Broad exemptions are sometimes cited without an apparent connection to the subject matter under discussion
- Regulator to Regulator meetings are often not noticed on the NAIC calendar.

¹ *The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies—including local and regional insurers as well as some of the nation's largest carriers—NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.*



These developments have reduced visibility into important policy discussions and risk undermining the collaborative framework that has historically benefited regulators, industry, and consumers alike. NAMIC also notes that much of the substantive drafting and development of NAIC policy occurs within task forces, working groups, drafting groups, and informal subgroup settings (including “book clubs”). While these forums are essential to efficiently developing complex and technical policy, they are also the stage at which key decisions are made, and foundational policy direction is established. In practice, once proposals advance beyond these early drafting stages, relatively few substantive changes are often made prior to adoption. As a result, limited transparency or stakeholder engagement during these phases can significantly constrain the ability of interested parties to provide meaningful input. While it may be perceived that these smaller or more technical groups benefit from a more informal or regulator-only setting, early engagement with stakeholders—including both industry and consumer representatives—can materially improve outcomes. Incorporating diverse perspectives at the outset helps identify potential issues sooner, reduces the likelihood of unintended consequences, and can prevent the need for significant revisions after adoption.

III. Recommended Enhancements to the Policy

In addition to recommending a loose alignment with state open meetings laws, several of the following recommendations are also consistent with widely accepted parliamentary principles reflected in Robert’s Rules of Order Newly Revised (RONR).

1. Establish a Clear Presumption of Openness

The Policy should explicitly provide that:

- Open meetings are the default for all NAIC committees, task forces, and working groups
- Closed sessions are limited to circumstances where confidentiality is clearly necessary
- In cases of uncertainty, meetings remain open unless a specific and justified exception applies

2. Clarify the Appropriate Scope of Closed Sessions

Closed sessions should not be used for:

- General policy deliberations
- Model law development
- Broad regulatory strategy discussions
- Stakeholder policy disagreements
- Administrative convenience

3. Strengthen Procedures for Entering Closed Session

The Policy should require:

- A formal motion to enter closed session (not full closed meetings)
- A clear statement by the Chair of the specific reason for closure
- Citation to the applicable Policy provision
- Approval by a supermajority (e.g., two-thirds)
- Documentation in meeting minutes as to the reason for closure and the vote to close

These procedures align with Robert’s Rules, which require a motion, second, vote, and record when entering executive session.



4. Limit Scope and Duration of Closed Sessions

Closed sessions should:

- Be limited to the specific topic requiring confidentiality
- Last only as long as necessary, rather than full meetings
- Be followed by prompt return to open session

5. Enhance Post-Meeting Transparency

A public summary should include:

- General subject matter
- Policy provision relied upon
- Whether decisions were made

6. Improve Notice, Documentation, and Accountability

- Public notice of meetings
- Identification of speakers
- Documentation of exemption use
- Mechanism to review exemption decisions
- Transparency for collaboration platforms

7. Establish Ongoing Reporting and Oversight

Annual transparency reporting should include:

- Number of meetings
- Number/duration of closed sessions
- Exemptions cited

8. Ensure Transparency in Early-Stage Drafting Activities

Transparency expectations should apply to:

- Task forces
- Working groups
- Drafting groups
- Informal subgroups
- Book Clubs

IV. The Evolving Role of the NAIC and the Need for Enhanced Transparency

NAMIC believes it is important to recognize how the role of the NAIC has evolved. As reflected in recent budgets and operational expansion, the NAIC has grown significantly in both size and scope, driven by increasing complexity in insurance markets and resource constraints at the state level. As a result, the NAIC now performs a range of functions that, in practice, extend beyond coordination and standard-setting and increasingly resemble elements of regulatory activity.

This includes:

- Data calls and data validation processes
- Analytical review of filings and models
- Development of standards and expectations relied upon by regulators

These activities can have a determinative impact on regulatory outcomes across jurisdictions. NAMIC raises these points to emphasize that as the NAIC's role and influence have grown, the importance of transparency has increased proportionally. To the extent the NAIC performs functions that are



regulatory in nature—or materially influence regulatory outcomes—it is essential that its processes reflect core regulatory principles, including:

- Preservation of state regulatory function
 - Presumption of openness
 - Procedural accountability
 - Stakeholder engagement
 - Transparency in decision-making
-

V. Conclusion

NAMIC appreciates the NAIC’s continued leadership and its willingness to consider constructive recommendations.

These revisions are intended to:

- Preserve necessary regulator-only discussions
- Promote consistency and clarity
- Align NAIC practices with Robert’s Rules of Order
- Improve stakeholder engagement
- Strengthen confidence in the state-based system
- Recognize the evolving role of the NAIC and align its processes with the expectations applied to regulatory bodies

We look forward to continued collaboration.

Respectfully submitted,

Erica Weyhenmeyer

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

PETER GOULD

March 20, 2026

Director Scott White, Chair
Executive (EX) Committee
NAIC

Sent via email to Cindy Catron at ccatron@naic.org

Re: Comments on Open Meeting and Videotaping Policies

Dear Members of the Executive Committee:

I am a retiree and am writing to comment as a consumer and annuity contract owner with skin in the game. I depend on annuities for a considerable portion of my retirement income. I purchased annuities as a source of retirement income I would not outlive - not as speculative investments. I appreciate the opportunity to participate in the deliberations on the Open Meeting and Videotaping Policies.

I submitted a proposed amendment to the Videotaping Policy on 8/7/2025 for presentation at the 8/12/2025 Executive Committee session (attached). At that time, I addressed only the Videotaping Policy. Ironically, when I reviewed the minutes of the 8/12/2025 meeting, I could find no mention of the proposal being discussed or even mentioned at that meeting. Of course, I had no access to either the livestream or recording of that session, so it was impossible for me determine what transpired - a perfect example of the need for the policy amendments that I proposed.

I had a telephone conversation earlier this week with Kay Noonan who explained that you have expanded the scope of this discussion to also include the Open Meeting Policy, as well as address any ADA accessibility issues, along with the Videotaping Policy. I commend you for taking a comprehensive approach to updating NAIC's meeting transparency.

Until my conversation with Kay, I was unaware of the Open Meeting Policy document. After our call, I took the time to review the 3/24/2025 Meeting Materials which included the current iteration (dated 4/1/2014) of the Open Meeting Policy.

I'll start with my proposed amendment to the Videotaping Policy. I stand by the proposal I submitted on 8/7/2025. Access to **BOTH LIVESTREAMS** and **RECORDINGS** of **ALL PUBLIC SESSIONS** - whether committee call, task force calls, in-person meetings or any other public meeting should be available to all stakeholders **AT NO CHARGE** and **BE EASILY ACCESSIBLE**. Current policies present practical barriers to stakeholder access (including fees, lack of recordings and limited availability) and serve to restrict participation to well-resourced entities and industry-paid lobbyists. Since writing my proposal, I realized that the amended policy should also provide for a reasonable retention/accessibility period (certainly no less than 12 months - preferably longer).

P.O. Box 8815 Bloomington, IN 47407-8815

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March 20, 2026

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Since submitting the proposed amendment, I've had conversations with other stakeholders, including NAIC Consumer Reps, researchers, academics, journalists and consumer advocacy organizations. Without exception, they confirmed the need for the proposed improvements. Of particular interest were my discussions with the Consumer Reps, who bemoaned the lack of recordings - especially when they are following or advocating on an issue under consideration and must miss a call or meeting due to a scheduling conflict.

Moving on to the Open Meeting Policy, I believe that the current policy favors opacity over transparency. The numbered list of exceptions from open meetings is unnecessarily broad. Each of these numbered items should be reviewed and narrowed as much as possible to promote transparency and serve stakeholders - especially consumers. In the case of #7 (state department compliance with NAIC standards) and #8 (planning related to Federal and International regulation), I see no reason why these should be exempted from being open meetings. In addition, the Open Meeting Policy should clearly state that journalists can quote from and summarize documents on the NAIC's committee, working group and task force websites in articles without violating the NAIC's copyright.

Finally, as to ADA access compliance, I am unfamiliar with these requirements. I recommend that in addition to meeting the legal ADA requirements, you reach out stakeholders with accommodation needs to better understand how to best facilitate their participation.

Thank you for your consideration of my comments and for the work that you do to protect consumers.

Yours truly,

Peter Gould

Peter Gould

Executive (EX) Committee

Amendment Proposal Form

(Submitted to NAIC on 8/7/2025 for consideration at the 8/12/2025 Executive Committee meeting)

1. Identify yourself, your affiliation, and a very brief description (title) of the issue.

Identification:

Peter Gould - consumer and annuity & life insurance policy owner

I am a retiree and annuity contract owner. I depend on annuities for a considerable portion of my retirement income. I purchased annuities as a source of retirement income I would not outlive - not as speculative investments.

As an annuity owner, the insurer's obligations to me are spelled out in my contracts. However, there are no provisions in my contracts that protect me or provide me with rights to prevent my insurer from becoming insolvent or unable to meet their contractual obligations to me. Like all other US consumers, I rely entirely on state regulators to adopt and enforce regulations that proactively and effectively prevent: failures of insurers, impairment of insurers' solvency and inability of insurers to honor their contractual obligations to policyowners.

Title of the Issue:

Improvement of stakeholder access to live NAIC public meetings and recordings of those meetings.

2. Identify the document, including the date if the document is "released for comment," and the location in the document where the amendment is proposed:

NAIC POLICY STATEMENT ON VIDEOTAPING - Revised April, 2010 -

https://content.naic.org/sites/default/files/meetings_videotaping.pdf

Note: this policy (originally adopted in 1998) is outdated and doesn't address the fact that all regular public committee meeting calls, as well as in-person meeting public sessions are broadcast virtually on Webex.

3. Show what changes are needed by providing a red-line version of the original verbiage with deletions and identify the verbiage to be deleted, inserted, or changed by providing a red-line (turn on "track changes" in Word®) version of the verbiage. (You may do this through an attachment.)

See attached

4. State the reason for the proposed amendment. (You may do this through an attachment.)

I'm relatively new to NAIC committee calls and meetings. These are important to me - especially since I have skin-in-the-game. There are 2 parts to this proposed amendment:

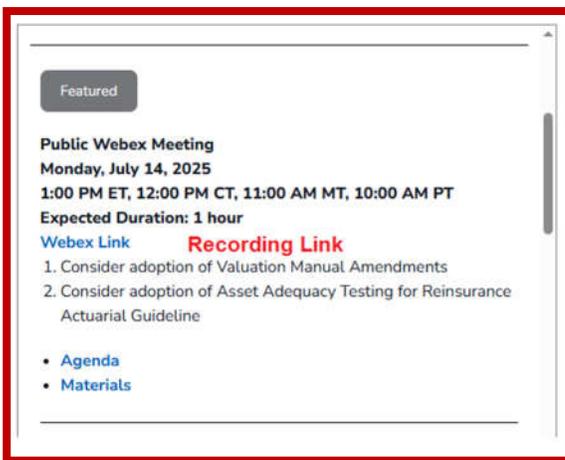
- A. Make recordings of all public committee calls and in-person meetings available to all stakeholders online via the NAIC website.

This is important to all stakeholders. I've noticed that on some calls not all regulators are able to attend. Also, there have been times when I've got a doctor's appointment or

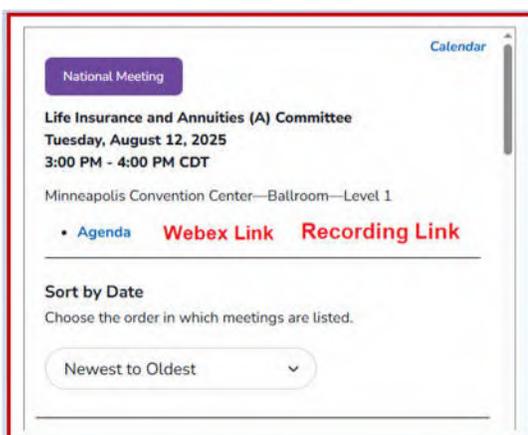
some other commitment that prevents me from attending. Other stakeholders (journalists, academics, etc.) often have conflicts that prevent them from attending a live session.

Some issues that I've been following span multiple committee calls and in-person meetings. When you miss a meeting, you can't catch up on what you missed. I understand that there are minutes for every meeting, but they are a summation rather than a complete transcript, thus reading the minutes doesn't provide the reader with all the nuanced discussion and points raised on a call or at a meeting. I have compared the minutes to sessions I've attended and can attest to their shortcomings.

Webex's technology makes it very easy to add a link to a document or website to access a Webex recording. I recommend putting the recording link into the meeting description on the committee page. Here's a marked-up example (Recording Link added) from the LIAC page:



B. Provide free live Webex access to all public in-person meeting sessions, as well as recordings. Although these are public meetings, the only ways for stakeholders to access them are to attend in-person or virtually at a substantial cost. If I wanted to attend the public sessions at this (summer) conference virtually, it would cost me \$875. That's more than my annual allowance for diesel fuel and beer. To attend in-person - add travel, hotel and meals and it would be even more financially prohibitive. As a result, stakeholders with limited resources are unable to attend or participate in the "public" sessions - they're on the wrong side of the velvet rope. Here's a marked-up example (Webex Link and Recording Link added) from the LIAC page:



NAIC POLICY STATEMENT ON ~~VIDEOTAPING~~ LIVESTREAMING AND RECORDINGS

The term ~~livestreaming~~ in this policy means the live broadcast of meetings via the internet or any similar technology.

The term ~~recording~~ in this policy means the capture of moving images and/or sound, by use of computer, digital camera, conventional video tape, film, the recording of livestreamed meetings or any similar technology.

The term ~~videotaping~~ in this policy means the capture of moving images, with or without the addition of sound, by use of computer, digital camera, conventional video tape, film, or any similar technology.

The term ~~audio taping~~ in this policy means the capture of sound by use of computer, digital recording, conventional tape, video, film, or any similar technology.

The NAIC will livestream and also record all public meetings, including but not limited to regular public committee meetings and public meeting sessions at events and in-person conferences. The information on how to access the livestreams and the recordings will be displayed with the information for each meeting on NAIC's website.

Also, tThe NAIC permits the ~~audio and videotaping recording~~ of its public meetings, including any meetings or events occurring at the meeting site, under the following guidelines:

- ~~Videotaping-Recording~~ of members and proceedings by broadcast journalists and news organizations is permitted;
- ~~Audio taping of members and proceedings by print or broadcast news organizations is permitted;~~
- ~~Audio and videotaping-Recording~~ for educational purposes by a member or by the NAIC staff is permitted.

All other ~~video and audio taping recording~~ is prohibited, unless express permission has been granted by the Chief Executive Officer of the NAIC. All permitted ~~taping recording~~ must comply with the following criteria:

- All persons present must clearly be informed that ~~taping recording~~ is occurring;
- ~~Taping-Recording~~ may not interfere with the view of registered meeting attendees;
- ~~Taping-Recording~~ may not distract from the conduct of the meetings;
- ~~Taping-Recording~~ may not create a safety hazard;
- Failure to follow these criteria automatically will rescind ~~taping recording~~ privileges of violators.