



## Division of Insurance Market Regulation

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August 17, 2023

Sent via email: [TCooper@naic.org](mailto:TCooper@naic.org)/  
[hmarsh@naic.org](mailto:hmarsh@naic.org)

Erica Weyhenmeyer, Chair  
Market Conduct Annual Statement Working Group  
c/o Teresa Cooper/Hal Marsh  
National Association of Insurance Commissioners  
1100 Walnut St, Suite 1500  
Kansas City, MO 64106

Dear Ms. Weyhenmeyer,

Thank you for the opportunity to provide additional comments on several items pending before the Market Conduct Annual Statement Working Group. Missouri offers comments on the following agenda items:

- Consideration of reporting of closed claims for Private Passenger Auto and Homeowners Lines of Business

We understand the rationale for requesting a clarification of the language related to the reporting of closed claims for the Private Passenger Auto and Homeowners lines of business. While we have no objections to the language, we urge the committee to consider expanding the request beyond the two lines of business listed on the proposal submission form. Several other MCAS blanks contain the same (or substantially similar language) and therefore would benefit from such a change.

- Consideration of Market Conduct Annual Statement (MCAS) Data Element Revision Process Timeline

We appreciate the work done to develop the proposed Data Element Revision Process Best Practices. The information in the document provides needed guidance on the process. However, this approach does not provide adequate safeguards to ensure sufficient time to review new lines of business is afforded to the entire Working Group.

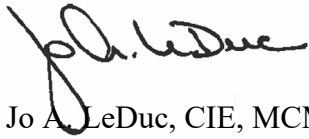
Setting a specific deadline, such as April 1<sup>st</sup>, for the SME to complete and present its work to the Working Group gives all parties sufficient opportunity to review the final proposal and provide comments. It will also give the Working Group time to thoroughly discuss the proposal, accept and consider comments, and make necessary amendments before voting.



Similar to the June 1<sup>st</sup> deadline established for the Working Group, a concrete deadline would set clear expectations for the SME. Furthermore, it would help manage the expectations of other parties involved in the process. For example, the Market Analysis Procedures Working Group would be able to estimate when a referral is needed so that the SME has sufficient lead time to develop the blank to meet the established deadline.

Thank you again for the opportunity to weigh in on the issues being considered by the Working Group. We look forward to continuing this important dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo A. LeDuc". The signature is fluid and cursive, with a large initial "J" and "L".

Jo A. LeDuc, CIE, MCM, CPCU, FLMI, AIDA  
Director, Insurance Market Regulation Division