

**Rikki Pelta**

Counsel

(202) 624-2355 t

[rikkipelta@acli.com](mailto:rikkipelta@acli.com)

sent via email to [hmarsh@naic.org](mailto:hmarsh@naic.org)

August 18, 2023

Erica Weyhenmeyer

Chair, Market Conduct Annual Statement Blanks (D) Working Group

NAIC

Rebecca Rebholz

Vice Chair, Market Conduct Annual Statement Blanks (D) Working Group

NAIC

**Re: Consideration of MCAS Filing Deadlines for Other Health and Short-Term, Limited Duration (STLD) Lines of Business**

Dear Ms. Weyhenmeyer & Ms. Rebholz:

Thank you for the opportunity to comment on the consideration of the filing deadline for the Other Health MCAS. We are writing in support of the Health Industry Interested Parties' request to set a permanent May 31<sup>st</sup> deadline for the Other Health MCAS. ACLI does not represent STLD but has no concerns with a May 31<sup>st</sup> deadline for the STLD MCAS.

ACLI's member companies are committed to providing accurate, valuable data and worked closely with the subject matter expert group and MCAS Blanks Working Group in developing the Other Health MCAS. Companies devote many resources to MCAS reporting and would be appreciative of a May 31<sup>st</sup> deadline. Given the additions to MCAS reporting, as well as other required reporting such as financial reporting being due in the same timeframe, it would be helpful to have more time to respond. When this request was discussed with the MCAS Blanks Working Group, regulators indicated that the suggested deadline of May 31<sup>st</sup> would give enough time to analyze the reported data. Thank you again for your time and the opportunity to comment. I would be glad to answer any questions or discuss further.

Sincerely,



Rikki Pelta

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

---

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 280 member companies represent 94 percent of industry assets in the United States.