



P.O. Box 68700, Indianapolis, IN 46468-0700  
20 F Street NW, Suite 510, Washington DC 20001  
P: 630-522-6322 | fraternalalliance.org

September 8, 2023

Jo LeDuc  
Missouri Department of Insurance  
Chair, NAIC Market Analysis Procedures (D) Working Group

Subject: Comments on Fraternal Exemption from MCAS

Dear Ms. LeDuc:

The following is submitted on behalf of the American Fraternal Alliance in response to continued discussions about the fraternal exemption from MCAS. The Alliance again appreciates the opportunity to provide our views about the fraternal exemption that has been in place since its inception.

We believe that the fraternal exemption from MCAS should remain for the reasons previously discussed, and we have not heard a compelling justification for changing course at this time.

The Alliance has been in contact with its members about the resources needed to comply with MCAS should the exemption be eliminated. All members contacted can comply but with varying degrees of additional resource investment. It will take smaller societies time to hire or train personnel or consultants, and time to identify and implement appropriate software and other tracking systems. Should the fraternal exemption be removed, we respectfully request six months or more notice in advance of the first calendar year for which reporting would be expected.

Our fraternal benefit societies safeguard their members' futures while providing significant volunteerism and contributions at a grassroots level all over the United States. Fraternal insurers are committed to protecting consumers, respect the role of regulators in doing so, and we appreciate the opportunity to continue the dialogue on this issue.

A handwritten signature in cursive script that reads "Allison H. Koppel".

Allison Koppel  
CEO  
American Fraternal Alliance  
Akoppel@fraternalalliance.org

*United in service and financial security*