

From: Milner, Morgan <Morgan.Milner@modern-woodmen.org>
Sent: Friday, June 9, 2023 11:12 AM
To: Weyhenmeyer, Erica <Erica.Weyhenmeyer@illinois.gov>
Cc: Helder, Randy <RHelder@naic.org>
Subject: Fraternal & MCAS

Dear Ms. Weyhenmeyer:

I am writing on behalf of Modern Woodmen of America in response to agenda item “c” included on the June 12 virtual meeting of the Market Analysis Procedures (D) Working Group.

Fraternal benefit societies have been excluded from the MCAS requirement since its inception. We believe the reason for excluding fraternal from MCAS historically is based on the fundamental differences between fraternal and commercial companies. More specifically, fraternal are, at their core, not-for-profit membership organizations that – as required by law – offer their members a variety of insurance products as well opportunities to give back to their communities through volunteerism and charitable works. Each member belongs to a local lodge and participates in the election of fraternal’s leadership. Our agents and members are active in communities which leads to limited complaints or market conduct concerns.

Importantly, maintaining the exemption from MCAS reporting does not mean that fraternal are free from oversight. Fraternal are subject to market conduct exams that state regulators conduct on a routine or targeted basis, and fraternal remain willing to provide complaint registers on an as needed basis.

Modern Woodmen and other fraternal benefit societies are eager to serve and protect our members. We look forward to continuing the dialogue on this issue and are happy to answer any questions.

Morgan Milner
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