

A Partial List of NAIC Models that Include Readability Standards

NAIC Model	Standard
22-Health Carrier Prescription Drug Benefit and Management Model Act	Sections 6 and 11 require plain language but there's no definition of plain language
74-Health Benefit Plan Network Access and Adequacy Model Act	Sections 6 and 9 require plain language but there's no definition of plain language
120-Coordination of Benefits Model Regulation	Includes an Appendix B which is described as a "plain language description of the COB process"; Flesch Reading Ease Score is 57.9 and Flesch Kincaid Grade level is 10.2
370-Consumer Credit Insurance Model Regulation	Section 14 (which is optional) requires a Flesch Reading Ease score of 40
575-Life and Health Insurance Policy Language Simplification Act	Section 5 requires a minimum Flesch Reading Ease score of 40 and printed, except for specification pages, schedules and tables, in not less than ten point type, one point leaded; The style, arrangement and overall appearance of the policy give no undue prominence to any portion of the text of the policy or to any endorsements or riders; and It contains a table of contents or an index of the principal sections of the policy, if the policy has more than 3,000 words printed on three (3) or fewer pages of text, or if the policy has more than three (3) pages regardless of the number of words.
670-NAIC Insurance Information and Privacy Protection Model Act	Sections 6 and 8 require plain language, without defining plain language
672-Privacy of Consumer Financial Health Information Regulation	Section 4 defines reasonably understandable as (i) Presents the information in the notice in clear, concise sentences, paragraphs and sections; (ii) Uses short explanatory sentences or bullet lists whenever possible; (iii) Uses definite, concrete, everyday words and active voice whenever possible; (iv) Avoids multiple negatives; (v) Avoids legal and highly technical business terminology whenever possible; and (vi) Avoids explanations that are imprecise and readily subject to different interpretations. (b) Designed to call attention. A licensee designs its notice to call attention to the nature and significance of the information in it if the licensee: (i) Uses a plain-language heading to call attention to the notice; (ii) Uses a typeface and type size that are easy to read; (iii) Provides wide margins and ample line spacing; (iv) Uses boldface or italics for key words; and (v) In a form that combines the licensee's notice with other information, uses distinctive type size, style, and graphic devices, such as shading or sidebars.

920-Home Service Disclosure Act	Section 8: All disclosure forms shall comply with state readability standards. It is presumed the disclosure form of Appendix A complies with the state readability standards. Also includes a drafting note explaining the Flesch Reading Ease test and basic principles of plain language. Appendix A has a Flesch Reading Ease Score of 61 and a Flesch Grade Level of 8.8.
929: American Health Benefit Exchange Model Act	Section 12 requires: The information required in subparagraph (a) of this paragraph shall be provided in plain language, as that term is defined in section 1311(e)(3)(B) of the Federal Act. The Federal Act defines plain language as “language that the intended audience, including individuals with limited English proficiency, can readily understand and use because that language is concise, well-organized, and follows other best practices of plain language writing.”

Compiled by Brenda J. Cude, Ph.D., NAIC Consumer Representative with assistance from Emma Tapp, CIPR Research Librarian, March 2024.