April 21, 2015

Market Regulation Accreditation (D) Working Group  
c/o Randy Helder  
Assistant Director, Market Regulation  
National Association of Insurance Commissioners  
rhelder@naic.org

Subject: Comments on Draft Market Regulation Accreditation Proposal

Dear Mr. Helder:

On behalf of our member companies, America’s Health Insurance Plans (AHIP), the American Insurance Association (AIA), the National Association of Mutual Insurance Companies (NAMIC), and the Property Casualty Insurers Association of America (PCI) submit comments on the Market Regulation Accreditation (D) Working Group’s (“Working Group”) Draft Market Regulation Accreditation Program Proposal (“Draft”) dated March 28, 2015. We were pleased to see that many of the standards included in the Draft reflected those included in an initial industry proposal submitted by a joint industry group in February, 2015.

We suggest that the Working Group consider additional changes in Category II – Market Analysis during its upcoming meeting during the NAIC e-Reg meetings in Kansas City. First, we suggest consideration for expanding Standard 2 to add, “Data elements for individual insurers should be verified before use in market analysis.” Second, we suggest consideration for adding a new Standard 5, addressing reconciliation of complaints – “The Department of Insurance shall have processes and procedures in place to receive, attempt to resolve, and track inquiries and
complaints. Department processes and procedures shall include a process for complaint reconciliation.”

The Working Group charge is to develop a formal market regulation accreditation proposal for consideration by NAIC membership by providing recommendations for the following: 1) accreditation standards; 2) process for state implementation of standards; 3) process for measure of state compliance with standards; and 4) process for future revisions to the standards. We note the Draft, circulated for comment April 13, 2015, addresses the first three prongs of this charge, but there is no information included therein relating to a process for making future revisions to the accreditation standards. This is a process that we feel must be formalized, though perhaps not fleshed out at this time.

While our comments at this time are limited to these two issues we look forward to the meeting in Kansas City where we anticipate a robust public discussion of accreditation may raise new ideas, alternatives and concerns. We thank the Working Group for engaging in an open and inclusive effort in moving forward with such an important process and look forward to continuing to work with you as you continue to develop a proposal for consideration by NAIC membership.

Sincerely,

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