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**North Carolina**

**From:** Nickerson, Ernest

**Sent:** Friday, July 24, 2009 3:48 PM

**To:** Leonard, Craig

**Cc:** Belo, Louis

**Subject:** RE: NAIC Notice: Special Accreditation Standards (D) Working Group Accreditation Proposal Concept (2009-07-20)

Craig,

In general, N.C. would support the concept of allowing states to develop an accreditation plan that could incorporate the uniqueness of the insurance climate in each state. However, if this approach is utilized, I think it would be beneficial if there were minimum parameters that were set and would perhaps be applicable in every state and at least that would establish a baseline. Also, if the plan is expected to be incorporated into law via either a statute or regulation, I think there should be a recommendation that it is consistent in each state so that it will carry the same weight in each jurisdiction. In essence, if it is determined that the plan should be a statute, each state should attempt to incorporate the plan into statute as opposed to a regulation. Also, another thing that may be a factor is the time frame in which a statute or regulation can be adopted in each state which would factor into the timing of legislative sessions and the implementation date. In addition, we would also need to consider how changes will be addressed and whether or not the legislature will need to be involved which would also impact timing. It is my understanding that it may take more time and effort to get a statute modified as opposed to a regulation, but it would be good to know if that is the case in most states.

Ernest