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**West Virginia**

**From:** Hooker, Mark

**Sent:** Monday, August 03, 2009 2:00 PM

**To:** Leonard, Craig

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

Craig,

We just have a few general comments. We are ok with the concept put for the in the 7/20/09 draft. That said we are hoping that this concept is intended to enhance approaches that have previously been discussed and submitted to the Special Accreditation Standards Working Group and not replacing them. Specifically we like Missouri's approach to examination and analysis authority which they submitted to the working group prior to the NAIC Summer National Meeting. Although there appeared to be a great deal of consensus among regulators however I do not believe the grouped discussed adoption or modification.

We would like to reiterate that although Market Regulation Accreditation is an enormous task, but some form of it should be implemented sooner rather than later. An incremental approach in adopting standards may be the best way to go; in other words the accreditation program may have relatively little standards in the beginning with the number and intensity of standards increasing yearly. Some tangible progress should be made and standards implemented this year. We believe that Missouri's approach, coupled with MIS participation standards may be a place to start. In the meantime we believe 7/20/09 proposal should be refined and perhaps adopted next year.

Mark A. Hooker, CIE, CPCU, MCM, CWCP, AAI, AU, AIS, LUTCF  
Chief Market Conduct Examiner  
State of West Virginia  
Offices of the Insurance Commissioner  
1124 Smith St  
P.O. Box 50540  
Charleston WV 25305  
(304)558-6279  
mark.hooker@wvinsurance.gov