

November 12, 2024

Interstate Insurance Product Regulation Commission  
444 North Capitol Street, NW  
Hall of the States, Suite 700  
Washington, DC 20001

**RE: Draft Strategic Plan for 2025-2028**

Members of the Management Committee:

The American Council of Life Insurers (ACLI)<sup>1</sup> appreciates this opportunity to provide the following comments on the Compact's draft Strategic Plan for 2025-2028.

Priority 1, Item #1 states:

*Strengthen policies and processes to address regulatory concerns with mix and match to confirm companies are using this process for legitimate reasons and to prevent the combination of state and Compact forms from being 1) noncompliant if wholly filed with the Insurance Compact or the state; or, 2) used to effectively amend forms approved by the Insurance Compact or the state, respectively.*

- We are seeking clarification as to whether previously filed, state-approved forms that are currently being utilized under Mix and Match might also have to be filed through the Compact (to the extent there are related uniform standards), even if they do not violate the two concerns mentioned above.

Priority 1, Item #6 states:

*Expand the applicability and types of Uniform Standards to apply to more parts of the regulatory review and approval process for Compact-authorized products including advertisements, point-of-sale disclosures, and administrative forms and processes.*

- Does the Compact intend to create new uniform standards for those particular items listed above? If so, would that also include policy summaries and illustrations?

Priority 1, Item #7 states:

*Recommend options for common or consequential variations between Uniform Standards and applicable state statute where a Compacting State may petition to accommodate a statutory conflict within the Uniform Standards while keeping as much uniformity as possible.*

- ACLI continues to be concerned about the growing number of state variations allowed within the Compact's standards and forms. Since one of the main benefits of the Compact is to alleviate the

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<sup>1</sup> The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 93 percent of industry assets in the United States.

implementation of a wide range of state variations, we would request that the allowance of additional variations in the Compact's standards and forms be kept to a minimum and only approved under exceptional circumstances.

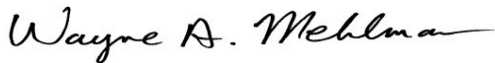
Priority 1, Item #5 states:

*Provide more flexibility for state insurance departments to exercise regulatory stays and opt outs to address conflicts between the Uniform Standards and state laws, especially when there is a later change to a model law/regulation, state statute, or Uniform Standard causing a conflict to arise.*

- While we understand the need for flexibility with regard to conflicts between Compact standards and state laws, we would also urge the Compact to discourage those states that have conflicts from considering the exercise of regulatory stays and/or opt outs.

Thanks again for this opportunity to provide comments on the draft Strategic Plan.

Respectfully submitted,



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