

From: Kilcoyne, Thomas
To: [Comments <comments@insurancecompact.org>](mailto:comments@insurancecompact.org)
Cc: [Narcini, Anne Marie](#); [Schutter, Karen](#)
Subject: Comments: Strategic Planning Framework discussion draft
Date: Thursday, July 25, 2019 4:02:27 PM

Please accept the following comments on the **Strategic Planning Framework** draft document. Note that these are my own comments as an interested regulator and do not represent a position of the Pennsylvania Insurance Department.

1. Consider refining the first Draft Priority for greater clarity, perhaps as follows.

- Uniform Standards States ~~Accept~~ Support and Companies willingly Use

Note that regulator support need not be wholehearted, and companies need not embrace the standards enthusiastically, so I hope the alternative language is still realistic. The initial draft language is suggestive of a very low bar.

2. Consider refining one of the corresponding Draft Objectives associated with the above priority, perhaps as follows.

- Reasonable - Uniform Standards reflect ~~balanced~~ product requirements that are not unduly prescriptive.

The nonspecific use of “balanced” could give the appearance of backpedaling on the goal of Robust consumer protection, which would not be intended. The above edit presupposes that the balance is between prescriptive language vs. openness to innovation, which is how I interpret the use of “balanced.” There could be other viewpoints on competing interests or attributes that need to be balanced, such as product clarity vs. product salability, but there should be agreement on the primary connotation of “balanced” to ensure that dialog is productive.

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3. Reconsider the use of “Relatable” in the third Draft Objective for the second draft priority. “Collaborative” seems like a better fit in many respects, except that it doesn’t begin with the letter “R”.

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Thank you for considering the above comments.

Tom
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