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Interstate Insurance Product Regulation Commission (IIPRC)
Rulemaking Committee
444 North Capitol Street, NW
Hall of the States, Suite 700
Washington, DC 20001-1509
comments@insurancecompact.org

RE: Draft Framework and Operating Procedure to Allow for Non-Employer Groups

Members of the Rulemaking Committee:

The American Council of Life Insurers (“ACLI”) would like to express its support for the Committee’s draft recommendation for a Framework and Operating Procedure that would accommodate the use of Compact-approved group products for eligible non-employer groups.

Currently, the Compact’s uniform standards for group products only apply to group term life insurance, disability income insurance and certain types of annuities, and their scope is limited to employer groups. Unfortunately, group products for non-employer groups must be submitted for approval and filed on a state-by-state basis.

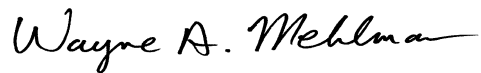
The proposed Framework and Operating Procedure would (1) expand employer groups to include portability trusts, labor unions and professional employment organizations, and (2) allow Compact-approved group products to also apply to non-employer groups, while keeping the authority for the approval of non-employer groups with the Compacting states as may be required by their applicable laws.

ACLI strongly supports both the expansion of employer groups and the use of Compact-approved products for non-employer groups, understanding that under the proposals, Compacting states would retain any applicable authority to determine whether a particular non-employer group should be approved before an insurer can offer a Compact-approved product to members of that group in those states.

If and when the proposed Framework and Operating Procedure are approved by the Commission, we look forward to working with the Compact to develop amendments to the group product standards that would expand their scope to include eligible non-employer groups. To that end, as a starting point, we submitted to the Compact, in August 2021, proposed applicable revisions to the eight sets of standards that apply to group term life insurance.

Thanks again for this opportunity to provide comments. If you have any questions, feel free to contact me at waynemehlman@acli.com or 202-624-2135.

Sincerely,

A handwritten signature in black ink that reads "Wayne A. Mehlman". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Wayne Mehlman
Senior Counsel, Insurance Regulation