

The National Organization of Life & Health Insurance Guaranty Associations ("NOLHGA") and the National Conference of Insurance Guaranty Funds ("NCIGF") are writing to comment on the Restructuring Mechanisms Working Group's (the "Working Group") May 2024 drafts of its Restructuring Mechanisms White Paper (the "White Paper") and Best Practices Procedures for IBT/Corporate Divisions (the "Best Practices"). First and foremost, NOLHGA and NCIGF appreciate the Working Group and NAIC staff's extensive efforts to incorporate changes related to guaranty association/fund coverage.

NOLHGA would like to offer a few suggested revisions to new language i

NOLHGA also proposes the following change to first sentence of