

July 6, 2023

Sent via electronic mail to
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Matt Tarpley, Chair
Market Conduct Examination Guidelines (D) Working Group
c/o Petra Wallace, Sr. Market Regulation Specialist
National Association of Insurance Commissioners
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RE: Exposure Drafts
Chapter 4 – Collaborative Actions 06-06-23
Chapter 23 – Conducting the Life and Annuity Exam 06-06-23

Dear Mr. Tarpley,

Thank you for the opportunity to provide comments to these very important chapters of the *Market Regulation Handbook*. We appreciate all the time and effort expended to review and draft the revisions. We believe the revisions will be very helpful to in the future.

Chapter 4 – Collaborative Actions

Missouri feels the requirements set forth in Section E are very much needed and will be extremely useful for consistency and completeness of multistate actions going forward. To build on these efforts, Missouri is providing a few suggestions and comments for consideration as follows:

1. Page 14.A., last paragraph – Consider adding the following or similar language to the paragraph to ensure that all lead states have an opportunity to weigh in on the language before presenting it to the company(ies):

Prior to sharing the MSA with the Company, the MSA should be provided to the lead states for review. A period of at least 10 working days should be allowed for the lead states to provide feedback. All feedback should be provided to the lead states by the date of the meeting.

3. Page 17.D.2. Exhibits, first paragraph – Some state laws may not treat exhibits the same as the report. Missouri law considers the exhibits to be work papers and are, therefore, confidential. The final report is a public document