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The NAIC released for public comment three proposed Fiscal Impact Statements (fiscals) related to its *State Ahead* strategic plan on July 17. These fiscals represent requests for funding within the 2018 budget. In response, one comment letter was received from the Property Casualty Insurers Association of America (PCIAA) (**Attachment One**). This memorandum summarizes their comments and includes the NAIC's response to each comment.

### **Data Protection**

1. PCIAA asked the NAIC to provide further information about NAIC plans in regard to the future protection of the collected data, including intellectual property and personal information.

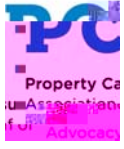
**NAIC Response:** The NAIC has always made it a priority to protect the data it collects and manages, and will continue to do so. There have been many projects and initiatives to enhance NAIC's cybersecurity program over the last three years. Our progress and overall security posture has been validated by one of the nation's top security firms in a review we undertake annually. We are continuing our commitment to security and protecting confidential data entrusted to the NAIC by state regulators and the industry with several projects initiated over the past year (data de-identification, web enterprise security, and security application enhancements). Two of the proposed fis

**NAIC Response:** While many aspects of data governance are currently utilized throughout the

### **Comment Periods on Future Fiscals**

5. PCIAA noted the comment period for these fiscals of two weeks was a short one and asked additional time could be allowed for comment on *State Ahead* fiscals going forward.

**NAIC Response:** The NAIC recognizes the concern presented by PCIAA and will take it into account for future proposals made outside of the n



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