



May 12, 2023

Eric Carlisle
Regulatory Coordinator
Pennsylvania Insurance Department
1341 Strawberry Square
Harrisburg, PA 17120

Re: Proposed amendment to Section 89.12(e) – Preparation of Forms and Collection of Demographic Information

Dear Mr. Carlisle:

On behalf of our life and health insurer member companies, the Insurance Federation of Pennsylvania writes in support of the Insurance Department's proposed regulation to amend Section 89.12(e) to allow – but not require – the collection of demographic information on application forms.

The Insurance Federation submitted a prior letter of support to the Insurance Department on November 11, 2022, in response to its draft regulation. That letter also included recommendations to clarify some of the regulation's language which the Department has incorporated in the proposed version.

The proposed regulation is intended to "allow insurers to collect data that will help them develop better tools to address inequities in life, accident and health insurance." The regulation is consistent with both impending changes at the federal level and industry initiatives to address these needs, and in that sense we look forward to continued collaboration with the Insurance Department in this area.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan C. Greer".

Jonathan C. Greer, President and CEO
Insurance Federation of Pennsylvania