



**Testimony of Insurance Agents and Brokers of Pennsylvania  
Before the Independent Regulatory Review Commission  
Regarding #11-262: Insurance Producers**

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Good morning. My name is Claire Pantaloni, and I am the Vice President of Advocacy for the Insurance Agents & Brokers (IA&B).

IA&B is a professional trade association for independent insurance agents. Our Pennsylvania membership is comprised of nearly 1,000 member agencies and their 7,500-plus employees located throughout the Commonwealth, representing a cross-section of large and small businesses providing all lines of insurance coverage to their clients, with a focus on property and casualty.

First, we would like to thank the Independent Regulatory Review Commission for the opportunity to comment on the Insurance Department's final-form regulation 31 Pa. Code Chapter 37.a – Insurance Producers. We would also like to thank Commissioner Humphreys and the staff members at the Pennsylvania Insurance Department for their work on these revisions. We have appreciated the collaborative process, and the robust communication the Department has had with stakeholders like us on these changes over the last several months.

The first point we would like to make is that IA&B welcomes the adoption of an updated regulation that accounts for the substantive changes made to the producer licensing statute through Act 147 of 2002.

As to the process, IA&B has had input since work began on a draft in 2023. We worked with the Department on several versions of the draft regulation. Throughout this process, the Department was receptive to our feedback and many of our suggestions were incorporated. We find that the final-form regulation is well organized, updates and brings greater clarity to important provisions of the regulation.

In addition to eliminating the use of outdated language and processes, the final-form regulation clarifies and modernizes various sections of former Chapter 37. It helps define insurance producers' roles as either the representative of the insurer or the representative of

the consumer for each transaction in which they take part, and to comply with the law accordingly. The regulation does impose a new record-retention requirement on insurance producers. However, these requirements generally comport with our members' existing business practices and should not disrupt their operations.

It is our belief that this new Chapter 37a will help insurance producers licensed in Pennsylvania understand their obligations and will facilitate compliance, and we respectfully request that IRRC approve the final-form regulation as presented.

Thank you again for the opportunity to provide comments regarding amended regulation 11-262, and for your consideration.