



Consumer Federation of America

David Altmaier, President
Marlene Caride, Chair, A Committee (Life and Annuities)
National Association of Insurance Commissioners
444 North Capitol Street (Suite 700)
Washington, DC 20001

Re: Life Insurance Underwriting in the Wake of COVID

Dear President Altmaier and Chair Caride:

COVID-19 has impacted consumers and regulators in many ways. As Americans get vaccinated and COVID recedes, we must be vigilant in protecting consumers from aftershocks.

I attach an article from Reuters ([*Global life insurers impose restrictions, worried about long-term pandemic risks*](#)), documenting significant changes in life insurance underwriting in Europe. Our initial inquiries have not turned up such changes in America, but the possibility of similar actions by life insurers here in America is high.

As the article indicates, life underwriters in Europe are imposing waiting periods of 30 days or more before considering insuring former COVID patients, including those who have recovered. Other insurers are limiting coverage by age groupings. Some are even imposing waiting periods on people who have not been diagnosed with COVID, based on previous symptoms alone.

Some reasonable precautions by life insurers are understandable but to burden COVID patients and their families a second time is unjust and unfair. The situation requires clear and transparent approaches that safeguard consumers.

Consumer Federation of America therefore calls upon the NAIC to adopt a model rule for life underwriters who might delay or deny life insurance coverage because an applicant had COVID or may have had it previously. The rule should require that the underwriting rules employed be made public prior to use, be totally transparent and meet standards for reasonability as to what would trigger delay or denial of coverage.

This rule is also important for current policyholders who may be considering dropping their coverage for a period to save some money to help the family get through the economic consequences of COVID. These policyholders need to know the possible danger of such action.

We are sending a copy of this letter to the leading life insurers and ACLI. Voluntary compliance with transparency and reasonableness of any COVID-related life insurance underwriting would be a welcome development.

Sincerely,

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Former Texas Insurance Commissioner

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Former Vermont Insurance Commissioner

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