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October 11, 2019

Office of the General Counsel
Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, D.C., 20410-00001

Re: Docket No. HUD-2019-0067
FR-6111-P-02 HUD’s Implementation of the FHA’s Disparate Impact Standard

Dear Sir or Madam:

The National Council of Insurance Legislators (NCOIL)¹ welcomes the opportunity to comment on the Department of Housing and Urban Development’s (HUD/Department’s) new proposed and revised implementation of the Fair Housing Act’s (FHA’s) disparate impact standard (“Rule”).

INTRODUCTION/SUMMARY

We appreciate the Department’s diligent revisions to the Rule. Sections (b), (c), and (d) establish standards consistent with the decision of the Supreme Court in *Inclusive Communities Project, Inc.* We focus on to whom these standards should apply, and recommend that section (e) fully exempt the business of insurance from the Rule, as its inclusion conflicts with prior Congressional action in the very area addressed by the Rule.

The Department’s publication of the Rule explained that the Oct., 2017 report of the Secretary of the Treasury “explicitly recommended that HUD reconsider applications of the Disparate Impact Rule, especially in the context of the insurance industry.” Fed. Reg. Vol. 84, No. 160 (Aug. 19, 2019) at 42856.

The Department responded in Section (e) by restating the McCarran-Ferguson Act’s “invalidate, impair, or supersede” standard. This preemption rule already applies under current law when there

¹ NCOIL is a legislative organization comprised principally of legislators serving on State insurance and financial institutions committees around the nation. NCOIL writes Model Laws on insurance, and works to both preserve the State jurisdiction over insurance as established by the McCarran-Ferguson Act seventy-four years ago and to serve as an educational forum for public policy makers and interested parties. See <http://ncoil.org/history-purpose/>



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is no relevant Federal “Act specifically relat[ing] to the business of insurance”²—which is usually the case, since McCarran delegated most policy choices regarding insurance regulation to the States.³

Congress does, however, from time to time pass substantive legislation specific to insurance regulation. The first time this happened was in McCarran itself, with respect to a few discrete issues, including the area covered by the Rule and section (e): insurer discrimination practices.

McCarran instituted Federal Trade Commission (FTC) enforcement of the Robinson-Patman Anti-Discrimination Act—previously thought not to attach to insurance—after a three year moratorium, but only to the extent the States did not legislate. This constituted what sponsors described as an “invitation to the States to legislate in good faith,” in order to “afford the public protection...against discrimination.”

The States correctly interpreted this carrot-and-stick mechanism as Congress’s mandate to them to enact statutes implementing Robinson-Patman unfair discrimination standards—requiring cost-based pricing, which, with respect to insurance, means actuarially justified rates—for the regulation of insurer discrimination practices.

Unlike most insurance code provisions, the resulting unfair discrimination laws did not result from State-by-State, independent policy judgments pursuant to Congress’s structural direction in McCarran that primary, independent State insurance policymaking “is in the public interest,” 15 U.S.C. 1011.

Instead, the historical record abundantly demonstrates that the States implemented McCarran’s substantive Federal policy regulating insurer discrimination practices in an unusually uniform manner, specifically adopting laws prohibiting “unfairly discriminatory” rates—all under Congress’s demanding, watchful eye and ticking deadline.

Robinson-Patman’s anti-discrimination standards—which are economic, not social—were made specific to insurance and insurer discrimination practices by McCarran, and in turn further to Congress’s intent, State insurance unfair discrimination statutes. By contrast, the FHA’s social anti-discrimination standards are not specific to insurance and insurer discrimination practices.

Robinson-Patman, unlike the FHA, does not recognize disparate impact liability for protected social classes. The former statute’s standard must control any administrative disparate impact rulemaking since Congress—by incorporating Robinson-Patman standards in McCarran—

² See Rule, Section (e) (“Business of insurance laws. Nothing in this section is intended to invalidate, impair, or supersede any law enacted by any state for the purpose of regulating the business of insurance.”); 15 U.S.C. 1012(b) (“No Act of Congress shall be construed to invalidate, impair, or supersede any law enacted by any State for the purpose of regulating the business of insurance...unless such Act specifically relates to the business of insurance.”).

³ See 15 U.S.C. 1011 (“Congress hereby declares that the continued regulation...by the several States of the business of insurance is in the public interest, and that silence on the part of the Congress shall not be construed to impose any barrier to the regulation...of such business by the several States.”); 15 U.S.C. 1012(a) (“The business of insurance...shall be subject to the laws of the several States which relate to the regulation...of such business.”).

regulated insurer discrimination practices without recognition of disparate impact liability for protected social classes in an “Act specifically relat[ing] to the business of insurance.”

We respectfully request that the Department reconsider and exempt the business of insurance from the Rule’s application of FHA social class disparate impact liability, in deference to the cost-based pricing, Robinson-Patman unfair discrimination standard implemented by the States—in the form of their unfair discrimination statutes—pursuant to McCarran’s mandate.

I. McCarran And Robinson-Patman

After the Supreme Court held insurance to be interstate commerce in June, 1944, *see U.S. v. Southeastern Underwriters Assn.*, 322 U.S. 533 (1944), Congress and the National Association of Insurance Commissioners (NAIC) engaged in substantial dialogue before, during, and after McCarran-Ferguson’s passage on March 9, 1945.⁴

NAIC prepared an early draft of this maiden Federal insurance regulatory legislation for Congress.⁵ The NAIC draft exempted insurance from the Robinson-Patman Anti-Discrimination Act.⁶ Robinson-Patman requires cost-based pricing by prohibiting “discriminat[ing] in price between different purchasers of commodities of like grade and quality.” 15 U.S.C. 13(a).

The proposed exemption met strong opposition, with Members arguing that “[i]t is unfair to legalize the practice of rate discrimination.” 91 Cong. Rec. 1091 (Feb. 14, 1945) (Rep. Bailey).⁷

Members also noted the awkwardness of applying Robinson-Patman—a statute regulating commodities—directly to insurance.⁸ It was thus suggested that, “If the Members wish a bill of the character of the Robinson-Patman Act to cover insurance...a special bill should be introduced which should cover it more equitably and more accurately than the Robinson-Patman Act, which was not written with insurance in mind.” 91 Cong. Rec. 1090 (Feb. 14, 1945) (Rep. Gwynne).

Congress responded in McCarran—a “special bill...written with insurance in mind”—by crafting a mechanism to force the States to implement a national regulatory policy prohibiting unfair

⁴ The NAIC was at the time the only State association dedicated to insurance regulation; NCOIL was formed in 1969.

⁵ *See, e.g.*, Cong. Rec. A 4403 (Nov. 16, 1944) (Sen. Hatch) (“I wish to ask to have printed in the...Record...the report of the subcommittee on Federal legislation...of the National Association of Insurance Commissioners...a press release...of the executive committee...[and] the text of the proposed legislation recommended by the [NAIC].”).

⁶ *See* Interim Report, NAIC Subcommittee on Federal Legislation, 1945 NAIC Proc. 158 (“The commissioners...asked for outright exemption from the Robinson-Patman Act.”); H.R. Rep. 143, 79th Cong., 1st Session, Feb. 13, 1945 (“Nothing contained in the...Act of June 19, 1936, known as the Robinson-Patman Antidiscrimination Act, shall apply to the business of insurance.”).

⁷ *See also*, 91 Cong. Rec. 1027-1028 (Feb. 12, 1945) (Rep. Cochran) (“If you look at section 3 of the bill you will find that it exempts all the business of insurance companies...from the...Robinson-Patman Act...I will not vote for the bill as...reported...unless section 3 is stricken.”); 91 Cong. Rec. 1092 (Feb. 14, 1945) (Rep. Kefauver) (“I doubt...Members...should...permanently exempt insurance from...the...Robinson-Patman Act.”).

⁸ *See* 91 Cong. Rec. 1090 (Feb. 14, 1945) (Rep. Gwynne) (“[S]ection 3 is not necessary...but it was inserted, I suppose, to make it clear that the Robinson-Patman Act should not apply to insurance....The Robinson-Patman Act was passed with the intent that it should regulate and control the sale of commodities. It was not meant to cover insurance.”).

discrimination by insurers: A three year moratorium, after which Robinson-Patman would apply to insurance if the States had not prohibited unfair discrimination.⁹

II. McCarran as Substantive Federal Policy Directing State Unfair Discrimination Laws

The moratorium was designed to compel the States to pass unfair discrimination laws. Senator O'Mahoney, broker of the final McCarran-Ferguson bill, described it as "an invitation to the States to legislate in good faith." 91 Cong. Rec. 1487 (Feb. 27, 1945). *See also id.* 1478 (Sen. McCarran) ("[T]he states are advised and warned that they have a moratorium of 3 years during which they may bring themselves into compliance by way of regulation."); *id.* 1483 (Sen. Radcliffe) ("[T]he States would have certain opportunities to regulate....If they should attempt to enact any laws which would permit...unjust discrimination, this bill would intervene and prevent.").

Congress thoroughly monitored the States' compliance efforts. Senator McCarran explained that his Judiciary Committee "survey[ed]...the status of accomplishments and plans of the States" in response to the "feeling in the Congress that the Federal legislature has a positive responsibility to see to it that there is adequate regulation of insurance...by the...States." Pat McCarran, "Insurance as Commerce—After Four Years," 23 Notre Dame L.Rev. 299, 303, 306 (1948).

According to Senator McCarran, "adequate regulation" specifically included: "Will the regulations afford the public protection...against discrimination...?" *Id.* at 310.

Our review of NAIC's published Proceedings from 1945-1947 demonstrates the States' paramount focus on complying with McCarran-Ferguson, including making a record of dozens of pages of reports submitted by NAIC's Subcommittee on the Robinson-Patman Act.¹⁰

The NAIC concluded that, while Robinson-Patman's applicability to insurance before 1945 was unclear, absent State legislative action, McCarran's incorporation by reference of the earlier statute "imply[ed] that after...1948...the Robinson-Patman Act will apply to the business of insurance." Report of NAIC Robinson-Patman Act Subcommittee, 1947 NAIC Proc. 183-184.¹¹

⁹ *See* 15 U.S.C. 1013(a) ("Until June 30, 1948,...the Robinson-Patman Anti-Discrimination Act...shall not apply to the business of insurance."); 15 U.S.C. 1012(b) ("[A]fter June 30, 1948,...the Act of October 15, 1914, as amended, known as the Clayton Act [Robinson-Patman amended the Clayton Act]...shall be applicable to the business of insurance to the extent that such business is not regulated by State law."). The bill as passed in 1945 set a Jan. 1, 1948 date for expiration of the moratorium, later changed to June 30, 1948 in a 1947 amendment, *see* footnote 12 and accompanying text.

¹⁰ *See, e.g.*, 1947 NAIC Proc. 153-172 (Reports of All-Industry Committee On Robinson-Patman Act; Report of the Subcommittee On The Robinson-Patman Act To The All-Industry Committee; Supplementary Report Of The Subcommittee On The Robinson-Patman Act; Supplemental Report); 1947 NAIC Proc. at 177-195. The three year moratorium in 15 U.S.C. 1012(b) is best known for its complex applicability to the Sherman Act, which is beyond the scope of, and not relevant to, the substance of this comment letter. Because McCarran's far simpler applicability to Robinson-Patman, and the resulting unfair discrimination statutes are well-settled law and were far less controversial than McCarran's interaction with the Sherman Act, the role of Robinson-Patman in McCarran-Ferguson implementation is largely forgotten to history. The NAIC Proceedings and other contemporaneous authorities, however, as demonstrated herein, are replete with analysis of Robinson-Patman's inclusion in McCarran-Ferguson and the importance of the State unfair discrimination statutes as a necessary policy response.

¹¹ *See also id.*, at 1947 NAIC Proc. 161 ("Our conclusion is that since Section 1 of Robinson-Patman amends the Clayton Law, it is included within the proviso of Section 2(b) of Public Law 15 [McCarran]. Being within the proviso,

This required a specific policy response: uniform passage of unfair discrimination laws. *See* Report of NAIC Robinson-Patman Act Subcommittee, 1947 NAIC Proc. 187-188 (explaining the “only way by which states may accomplish the ouster” of Robinson-Patman was “through the passage of rate regulatory laws” that “included...anti-discrimination sections,” and recommending the “enactment in each State—either as an integral part of the rating law or independently—of statutes...prohibiting unfair rate discriminations.”).

The States quickly passed model NAIC rating laws including unfair discrimination prohibitions in their legislative sessions following McCarran’s enactment. Congress, satisfied by the response to its “invitation to the States to legislate in good faith,” extended the moratorium from Jan. 1 to June 30, 1948, providing the States more time to pass McCarran-compliant legislation.¹²

III. State Unfair Discrimination Laws Implement A Federal Policy of Cost-Based Pricing

As Congress intended, the State unfair discrimination laws implemented as national regulatory policy the same basic anti-discrimination standard as Robinson-Patman: cost-based pricing and equal economic treatment of similarly situated consumers. *See* New York Superintendent/NAIC President Robert Dineen, Remarks, Sept. 21, 1948 (explaining that “the rationale of” the “Robinson-Patman Act, the All-Industry [NAIC Model] Bills and the New York rating law” is “generally the same, namely, that where varying prices on the same articles are quoted to different buyers...the seller should be able to establish that the variations in price are fair and reasonable.”).¹³

the price discrimination...subsection[] appl[ies] to insurance ‘to the extent’ that there is no state law regulating the specific activities prohibited by these sections.”); Address of NAIC President Robert E. Dineen, 1947 NAIC Proc. 297 (“Many observers feel that despite the uncertainty as to whether or not insurance constitutes ‘goods’ or ‘commodities’ as those words are used in the Robinson-Patman Act [citations omitted], the very fact that the Robinson-Patman Act is specifically mentioned in U.S. Public Law 15 [McCarran] is a clear indication that Congress intended its provisions to apply to the insurance business.”); Memorandum of NAIC Casualty and Surety Rating Bill and Fire and Inland Marine Rating Bill Drafting Committee, 1946 NAIC Proc. 127 (“[T]he Robinson-Patman Act, a portion of which will be applicable to the insurance business after January 1, 1948, expressly prohibits price differentials by reason of volume or size unless supported by adequate cost figures.”); Supplemental Report of NAIC Robinson-Patman Act Subcommittee, 1947 NAIC Proc. 170 (“[I]nsurance cannot afford to proceed on the assumption that the Robinson-Patman Act is inapplicable and run the risk of the federal penalties, namely, action by the Federal Trade Commission, suits for treble damages, and in some cases criminal prosecution.”).

¹² *See* Sen. Rep. 407 (July 1, 1947) (“This bill extends the so-called moratorium provision of Public Law 15...from January 1, 1948, until June 30, 1948. The committee is informed and is satisfied that an effort has been exerted by the insurance industry, the insurance commissioners, and the States in dealing with the matter of State regulation...[I]t would appear most desirable to extend this moratorium period an additional 6 months.”).

¹³ Quoted in Stone and Campbell, “Insurance and the Robinson-Patman Act,” 1949 *Ins. L.J.* 553, 564 (1949). *See also* Speech of NAIC president James McCormack, 1946 Proc. 212-213 (“[N]o state legislation should prevent the economic non-discriminatory rating of risks....There should be no unfair discriminations.”); Hanson et al, “Monitoring Competition: A Means of Regulating the Property and Liability Insurance Business,” at 440 (1974 National Association of Insurance Commissioners) (NAIC treatise describing the “parallel...between the state insurance prohibitions against unfairly discriminatory rates and the Robinson-Patman Act [which]...prohibits sellers from discriminating in price between different purchasers....[I]f the costs are the same, the seller cannot discriminate price....This is akin to the unfairly discriminatory concept in the insurance laws.”).

The State rating laws explicitly recognize that they implement substantive Federal unfair discrimination public policy pursuant to a Congressional mandate. *See, e.g.*, 24-A Me. Rev. Stat. § 2301 (“The purpose of this chapter is to promote the public welfare by regulating insurance rates, in accordance with the intent of Congress as expressed in Public Law 15—79th Congress [McCarran], to the end that they shall not be excessive, inadequate or unfairly discriminatory.”); *Karlin v. Zalta*, 154 Cal.App.3d 953, 967 (1984) (“There ensued precipitate state action to implement the McCarran Act and by 1950 every state had enacted rate regulatory legislation.”).¹⁴

The State unfair discrimination statutes establish an economic, cost-based pricing standard—which, with respect to insurance, means actuarially justified rates—for the regulation of insurer discrimination practices. “[U]nfair discrimination’ is a word of art used in the field of insurance which, ‘[i]n a broad sense...means the offering for sale to customers in a given market segment identical or similar products at different probable costs.’ [Citations omitted.]” *Polan v. State of New York Ins. Dept.*, 3 A.D.3d 30, 33 (N.Y. App. 2003).¹⁵

This regime differs fundamentally from the FHA: Courts distinguish the economic unfair discrimination standard specific to insurance from social standards applied under general civil rights laws. *See, e.g., Thompson v. IDS Life Ins. Co.*, 274 Or. 649, 654 (1976) (“The Insurance Commissioner is instructed to eliminate unfair discrimination, whereas the Public Accommodations Act prohibits *all* discrimination. The reason for the different standards...is that insurance...always involves discrimination...based on statistical differences and actuarial tables. The legislature specifically intended...to only prohibit *unfair* discrimination in the sale of insurance policies.” [Emphasis in original.]).

IV. McCarran’s Discrimination Standard—Specific to Insurance And Not Recognizing Disparate Impact—Controls Over the FHA’s Discrimination Standard, Which is Not Specific to Insurance.

With little Federal substantive law specific to insurance regulation, McCarran’s “invalidate, impair, or supersede” standard—governing Federal Acts not specific to insurance and State insurance regulatory laws—is the most common way that Federal statutes are applied to insurance.

The Rule, however, pertains to subject matter (insurer discrimination practices) governed by a Federal statute specific to insurance (McCarran-Ferguson). The FHA, a statute not specific to

¹⁴ *See also* 18 Del. C. § 2501 (“The purpose of this chapter is to promote the public welfare by regulating insurance rates...in accordance with the intent of Congress as expressed in Public Law 15-79th Congress [McCarran]...and to the end that they shall not be excessive, inadequate or unfairly discriminatory.”); *Pac. Fire Rating Bur. v. Ins. Co. of N. Am.*, 83 Ariz. 369, 371 (1958) (“Because the federal antitrust laws were, by Public Law 15...made inapplicable to insurance only to the extent that the business was regulated by state law, each state proceeded to enact a rate law.”); *Ins. Co. of N. Am. v. Com’r. of Ins.*, 327 Mass. 745, 748 (1951) (“During the period of delay thus afforded [McCarran moratorium], model laws were prepared by the [NAIC]...These have now been adopted with few changes in almost every State.”).

¹⁵ *See also Ins. Com’r v. Engelman*, 345 Md. 402, 413 (1997) (“Unfair discrimination, as the term is employed by the Insurance Code, means discrimination among insureds of the same class based upon something other than actuarial risk.”); *Life Ins. Assn. v. Com’r. Of Ins.*, 403 Mass. 410, 416 (1988) (“The intended result of the [risk classification] process is that persons of substantially the same risk will be grouped together, paying the same premiums, and will not be subsidizing insureds who present a significantly greater hazard.”).

insurance, protects social classes and recognizes disparate impact. By comparison, protected social class disparate impact liability has not been found cognizable under the economic statute made applicable to insurance under McCarran: The Robinson-Patman Anti-Discrimination Act.

McCarran’s specific direction regarding regulation of insurer discrimination practices—under which protected social class disparate impact liability is not cognizable—must control over the FHA because the latter statute is not specific to insurer discrimination practices. “It is a commonplace of statutory construction that the specific governs the general.” *NLRB v. SW General, Inc.*, 137 S.Ct. 929, 941 (2017) (Internal citation and punctuation omitted).¹⁶

Section (e) of the Rule would run contrary to this canon and compound the error by codifying, for insurer discrimination practices, just McCarran’s “invalidate, impair, or supersede” standard—which is designed to apply only absent a relevant “Act specifically relat[ing] to...insurance,” 15 U.S.C. 1012(b), *supra*.

The Department itself has conceded the priority of McCarran over the FHA in the context of regulating insurer discrimination practices. In an Oct. 4, 1977, HUD memo, prepared to develop a “detailed work plan on insurance redlining,” and shared with the NAIC, 1978 NAIC Proc. Vol. I at 637, HUD’s Redlining Staff explained that “The role of the federal government...is somewhat limited with this industry given the McCarran-Ferguson Act,” *id.* at 640.¹⁷

Recognizing that no Federal law other than McCarran regulated insurer discrimination practices, the HUD Redlining Staff approvingly described “current federal legislative initiatives”—including “Pending Title VIII amendments [which] might make insurance companies covered by the Fair Housing Act[,] thus prohibiting discriminatory practices.” *Id.* at 641. These proposed bills failed, however, and Title VIII, the FHA, still contains no language specifically covering insurers.

Further, Congress has repeatedly considered, but never passed, amendments to McCarran regulating insurer discrimination practices by protected social class.¹⁸ Thus McCarran’s original statutory incorporation by reference of Robinson-Patman remains controlling Federal policy regarding insurers.¹⁹ Since Robinson-Patman is not a statute that recognizes protected social class

¹⁶ See also *Radzanower v. Touche Ross & Co.*, 426 U.S. 148, 153 (1976) (“It is a basic principle of statutory construction that a statute dealing with a narrow, precise, and specific subject is not submerged by a later enacted statute covering a more generalized spectrum....‘The reason and philosophy of the rule is, that when the mind of the legislator has been turned to the details of a subject, and he has acted upon it, a subsequent statute...treating the subject in a general manner, and not expressly contradicting the original act, shall not be considered as intended to affect the more particular or positive provisions....’ [Citation omitted.]”).

¹⁷ HUD’s staff Memo also concluded that a Federal agency specific to insurance—the Federal Insurance Administration, not HUD—“was the most obvious agency to begin considering” how to address redlining. *Id.* at 640.

¹⁸ See, e.g., Insurance Competition Improvement Act, S. 2474, 1980.

¹⁹ State insurance codes prohibit direct (but not indirect, disparate impact) discrimination by insurers against protected social classes. See, e.g., NAIC Property and Casualty Model Rating Law (No. 1780), Section 4 (“Rates shall not be excessive, inadequate, or unfairly discriminatory....[R]ating plans [may] establish standards for measuring variations in hazards or expense provisions....[and] may measure any differences among risks that can be demonstrated to have a probable effect upon losses or expenses. No risk classification, however, may be based upon race, creed, national origin or the religion of the insured.”).

disparate impact liability, a Federal disparate impact standard for insurer discrimination practices cannot be created by administrative rulemaking that implements a statute—the FHA—that is not specific to insurance.

CONCLUSION

The Treasury Report, cited in the Rule’s publication, asked “whether the disparate impact rule...is consistent with McCarran-Ferguson and existing state law [and]...whether such a rule...is reconcilable with actuarially sound principles.” Treasury Report to the President, Oct. 2017, 110. NCOIL—pursuant to its mission of “preserv[ing] the state jurisdiction over insurance as established by the McCarran-Ferguson Act”²⁰—is uniquely qualified to comment on this question.

While our organization protects State legislators’ discretionary authority as primary regulators—granted under McCarran’s unique structural regime wherever no Federal “Act specifically relates to...insurance”—we understand that State unfair discrimination statutes were passed in conscientious response to McCarran’s substantive mandate.

McCarran, an “Act specifically relate[d] to...insurance,” applies Robinson-Patman cost-based pricing standards to insurer discrimination practices. Including insurance in the Rule would undermine the States’ diligent efforts to implement McCarran’s Federal insurance regulatory policy under which insurer discrimination practices are not subject to disparate impact liability.

Absent contrary direction from Congress specific to insurance, McCarran’s economic discrimination standard specific to insurance must control. We therefore respectfully suggest that, because the FHA is not specific to insurance, exempting insurers from the Rule’s disparate impact discrimination standard for protected social classes is not just appropriate, but necessary.

Thank you for your consideration. Please contact the undersigned, at 732.201.4133, or tconsidine@ncoil.org, should you require further information.

Very truly yours,



Thomas B. Considine
Chief Executive Officer
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²⁰ <http://ncoil.org/history-purpose/>.