



April 17, 2026

The Honorable Brenda Carter, Chair
Life Insurance & Financial Planning Committee
National Council of Insurance Legislators

Dear Chair Carter and Distinguished Committee Members:

On behalf of the American Council of Life Insurers, thank you for your commitment to developing the NCOIL Model Act Regarding Life Insurers' Use of Genetic Information, which represents a thoughtful, well-reasoned approach to life insurers' use of genetic testing information. By recognizing the importance of information symmetry, the model will protect against adverse selection and help ensure that life insurance remains accessible and affordable for all American families.

Genetic information is not fundamentally different from other health data, such as blood pressure and family medical history. Access to genetic information, like any other relevant health information, is essential for maintaining the fundamental principles of the voluntary life insurance market. The very core of life insurance underwriting involves pooling the risks of individuals with similar health and life expectancies. Information symmetry is essential because it aligns the risks known by the applicant with those assessed by the insurer, which helps ensure fair pricing and maintain stable markets.

Thank you, again, for your hard work on this model and dedication to an approach that will help sustain a healthy and affordable life insurance market. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a horizontal line extending to the right.

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The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 94 percent of industry assets in the United States.