



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES  
LANSING

ANITA G. FOX  
DIRECTOR

November 6, 2024

Sent via email to: [JCAR@legislature.mi.gov](mailto:JCAR@legislature.mi.gov)

Joint Committee on Administrative Rules  
Boji Tower, 3<sup>rd</sup> Floor  
124 W. Allegan St.  
P.O. Box 30036  
Lansing, MI 48909-7536

Re: Session day waiver request

Dear Chairperson Wojno and committee members:

As the regulatory affairs officer for the Department of Insurance and Financial Services (DIFS), I respectfully request that the Joint Committee on Administrative Rules waive the remaining session days under the authority provided in the Administrative Procedures Act of 1969 (APA), MCL 24.245a(1)(d), for the review of the following rules, which were submitted to the Committee on June 20, 2024:

Term and Universal Life Insurance Reserve Financing R 500.121 to R 500.128  
(MOAHR #2023-64 IF)

These rules govern reserve financing arrangements used by certain life insurers in reinsurance transactions to secure the reinsurance treaty or capitalize the reinsurer to meet statutory reserve requirements. The rules ensure that funds backing these transactions are held in the appropriate form and level of security.

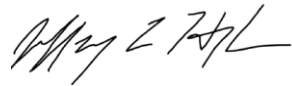
These rules would adopt Model Regulation #787 of the National Association of Insurance Commissioners (NAIC). DIFS currently implements substantially similar requirements through review of financial statements filed with DIFS pursuant to the Director's order issued under MCL 500.438 of the Insurance Code of 1956. The NAIC has adopted the Model Regulation as a state insurance accreditation standard. These rules would, therefore, also assist in establishing uniform, national standards for the reserve financing arrangements subject to the rules and ensure DIFS maintains its accreditation status.

A public hearing for the proposed rules was held in accordance with the APA on June 4, 2024, and the written comment period closed at 5:00 p.m. on that same date. DIFS did not receive written public comments regarding the rules, and there were no individuals present at the public hearing wishing to testify.

Given the need to enhance efficiency in the licensure process and to ensure that DIFS maintains its own accreditation status, DIFS respectfully asks that the committee waive the balance of the session days in the review period.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Hayden", with a stylized flourish at the end.

Jeffrey Hayden  
Regulatory Affairs Officer  
Department of Insurance and Financial Services  
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cc:

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