

April 3, 2020

Honorable Steven Mnuchin  
Secretary  
U. S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

RE: 2020 Terrorism Data Call

Dear Secretary Mnuchin:

We write to request that Treasury consider extending the deadline for insurer responses to the Treasury's 2020 Annual Terrorism Data Collection. As you are well aware, like the rest of the country and the world, the COVID-19 crisis has caused insurers to face unprecedented operational challenges in responding to the needs and demands of both their customers and their regulators. The crisis has raised numerous issues for insurers, including responding to questions of coverage and being flexible with policyholders' ability to pay their premiums. Like all Americans, insurers are working diligently to adjust to this sudden new reality.

In particular, U.S. insurers have been deluged with a number of new data calls from state regulators requesting information on such things as operational readiness, impacts on financial markets, and policy coverage issues, among others. In most cases, the period of time allowed to respond to these data calls is measured in days. This has placed further stresses on insurers' operational abilities to deal with the various other demands arising from the COVID-19 crisis. Indeed, the problem has become so acute that the National Association of Insurance Commissioners (NAIC) has contacted state regulators to urge them to refrain from issuing more data calls related to COVID-19 until the NAIC completes work on a standard reporting template that is intended to harmonize and streamline the data calls, coordinating them through a lead state. The goal is to reduce burdens on both insurers and regulators. However, it is not yet clear when this template will be available and how many states will exercise restraint in the data calls in the meantime or, for that matter, even after the template is complete.

We appreciate the importance of the terrorism data call, and we hope you will agree that our members have always endeavored to respond to it diligently in the past. However, we respectfully suggest that, in this moment, insurers first priority must be to deal with the issues arising from the current crisis and to ensure that they are prepared to play their part in helping the nation recover from the economic shock that America has suffered, the full extent of which is still unknown. For these reasons, we request that the response date for the 2020 Annual Terrorism Data Call be pushed back to at least July 15, 2020.

As you know, the states collect the same terrorism data that Treasury collects, and they have coordinated their data call and response date with Treasury's. We will also ask the states to adjust their response date consistent with the change we hope Treasury will make.

Thank you for your consideration of this urgent matter.

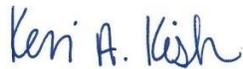
Sincerely,



Vice President, Policy  
American Property Casualty Insurance Association (APCIA)



Assistant Vice President  
National Association of Mutual Insurance Companies (NAMIC)



Director of Government Relations  
Wholesale Specialty Insurance Association (WSIA)

cc: Steven Seitz, U.S. Treasury Department  
Richard Ifft, U.S. Treasury Department  
Ray Farmer, National Association of Insurance Commissioners  
Martha Lees, New York State Department of Financial Services