



Financial Security for Life

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MORTGAGE BANKERS ASSOCIATION

Mike Flood
SVP, CMF, Policy & Member
Engagement

January 15, 2021

Mr. Dale Bruggeman
Chair, Statutory Accounting Principles (E) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

Re: Working Group's Recent Action on INT 20-03 and INT 20-07

Dear Mr. Bruggeman:

The Mortgage Bankers Associations (MBA)¹ and the American Council of Life Insurers (ACLI),² on behalf of our respective member insurers, express their support for the Statutory Accounting Principles (E) Working Group's proposed extensions of the periods covered by INT 20-03 and INT 20-07, to conform them to the period covered by section 4013 of the CARES Act, *Temporary Relief from Troubled Debt Restructurings (TDR)*, as amended on December 27, 2020.

We believe it is appropriate for SAPWG to continue to harmonize insurers' financial reporting of modifications of mortgage loans and certain other debt instruments under statutory accounting standards and financial reporting of the same modifications under United States Generally Accepted Accounting Principles (US GAAP).

¹ The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 280,000 people in virtually every community in the country. Its membership of over 2,300 companies includes all elements of real estate finance: mortgage companies, mortgage brokers, commercial banks, credit unions, thrifts, REITs, Wall Street conduits, 70 life insurance companies engaged in real estate finance, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org

² 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 280 member companies represent 95 percent of industry assets in the United States. Learn more at acli.com.

We want to take this opportunity to express on behalf our members our appreciation for how quickly and effective the SAPWG has operated throughout this pandemic to provide insurers with certainty as to these important accounting issues.

Sincerely,



Mike Flood



Paul Graham

cc: Julie Gann, Assistant Director-Solvency Policy
Robin Marcotte, Senior Manager, Accounting Policy
Jim Pinegar, Manager II – Accounting Policy
Fatima Sediqzad, Senior SCA Valuation & Accounting Policy Advisor
Jake Stultz, Senior Accounting and Reinsurance Policy Advisor