

May 14, 2026

Ohio Senate Leadership
Ohio House of Representatives Leadership
Ohio House Insurance Committee

Columbus, Ohio

Dear Ohio Lawmaker,

On behalf of Consumer Action for a Strong Economy (CASE), we write to urge you to oppose a specific provision within Senate Bill 306 (SB 306) that poses a serious and unnecessary threat to Ohio consumers. CASE advocates for market-based policies that protect consumers and promote a fair and competitive marketplace. It is precisely this mission that compels us to raise this concern.

A Special-Interest Carve-Out Inserted into a Routine Bill

SB 306 began as a property and casualty insurance bill. However, a provision was quietly inserted into this legislation that has nothing to do with property or casualty insurance. This provision would create a new category of licensee called the "unaffiliated insurance agent," enabling certain fee-only financial advisors to sell variable annuities and life insurance products while bypassing the training, examination, and oversight requirements that apply to every other seller of these products in Ohio.

This is not a technical clarification. It is a fundamental restructuring of how some of Ohio's most complex financial products are sold — and it was inserted into a P&C omnibus bill without full consensus or debate.

Why This Provision Harms Ohio Consumers

Ohio's current insurance licensing system is built on a coherent chain of accountability. Before any agent sells an annuity, they must pass state insurance examinations, complete training, undergo background checks, and be formally appointed by the insurer whose products they sell. That appointment is not a formality. It means an insurer has trained and vetted the agent, stands behind their recommendations, and shares accountability. The Ohio Department of Insurance maintains regulatory oversight of the entire chain.

SB 306's "unaffiliated" license removes those safeguards for a narrow class of advisors. Qualifying under this provision requires only a FINRA Series 65 or Series 66 investment license, credentials designed for investment advice, not insurance sales. These advisors would not be required to complete a state insurance exam, would not complete product-specific training, and would not be appointed by the insurers whose products they sell. Critically, they would no longer act as agents of the insurer, shifting legal responsibility in ways that leave Ohioans with far less recourse if something goes wrong.

Ohio's Hard-Won Consumer Protections Deserve Better

Ohio was a national leader when it adopted its Best Interest annuity standard, requiring every agent and every insurer to act in the client's best interest. That standard works because the regulatory framework behind it is coherent and comprehensive. Introducing a third distribution channel — lightly supervised, outside the insurer accountability structure, and exempt from the training requirements everyone else must meet — fractures that framework and leaves consumers without a clear path for recourse.

There is also a fundamental fairness problem. All annuity sellers in Ohio operate under the current, full-accountability system. They completed the required training. They passed the exams. They built their practices within the rules. SB 306 would allow a politically connected group to bypass that process entirely – not because their approach is better for consumers, but because they have the lobbying power to demand a carve-out. That is not sound policy. It picks winners and losers based on political access, not consumer outcomes.

Our Request

We respectfully urge you to remove the "unaffiliated insurance agent" provision from SB 306. A sound property and casualty insurance bill should not be used as a vehicle to weaken annuity consumer protections. Ohio families work a lifetime to build their retirement savings. They deserve the full protection of Ohio's existing oversight framework, regardless of who is selling them a product.

If you have questions or would like to discuss this matter further, we welcome the opportunity to engage. Thank you for your consideration and your continued commitment to Ohio consumers.

Sincerely,

Gerard Scimeca
Chairman
Consumer Action for a Strong Economy

Matthew Kandrach
President
Consumer Action for a Strong Economy