

NorthStarExams Insurance Regulatory Consultants and Examiners

Office: 6605 Kennedy Drive Colleyville, TX 76034 817.939.9040 www.northstarexams.com Donald P. Koch, CIE, AMCM 9032 Ninnis Drive Juneau, AK 99801 Cell: 302.743.8445 Email: don.koch@northstarexams.com

June 14, 2017

Petra Wallace, AAI, ACP, AMCM, ASLI Market Regulation Specialist NAIC Market Regulation 1100 Walnut Street, Suite 1500 Kansas City, MO 64106

Dear Petra

The question posed by Carla Bailey of Washington at the MCESWG meeting was a good one. The note on page 21 of my proposal following Ch16§A01 #12 does not need the second sentence. Removal of that sentence allows the rest of the note to apply to on and off site examinations. It would be appropriate to remove the sentence.

Note: The State and the examiners are aware that these documents may be viewed as proprietary and sensitive. The reports will be viewed on the company premises after commencement of the on-site portion of the examination. The examiners, based on the results of audit findings for which the company has taken appropriate corrective action and remediation, will not recommend administrative action. The purpose for viewing these documents is to determine that management directives are in compliance with statute and that errors found through the audit process are corrected. It is not used as a device to discover and quantify violations, rather it is used for qualitative purposes. Any special needs or concerns should be discussed with the Examiner in Charge.

Thank you.

Sincerely,

Don Koch

NSE 100 Rev. 04/10/12

G:\MKTREG\DATA\D Working Groups\D WG 2017 MCES (PCW)\Docs\_WG Calls 2017\Process Review Methodology\Comments Received\Don Koch 6-14-17 Comments.docx