



NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

A REPORT OF THE NAIC ON THE STATE INSURANCE REGULATORY RESPONSE TO COVID-19

UPDATE 1 / JANUARY 1 — MAY 31, 2020

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COVID-19 has changed the way we live and work in ways we never would have imagined a few short months ago. As the scale and threat to the health and financial stability of our market has taken shape, at the NAIC, our mission and top priorities are very clear. Our primary focus is now on assisting insurance regulators in protecting the health and safety of U.S. consumers and ensuring the ongoing stability and operation of our nation's critical insurance sector in light of COVID-19. Since early March, this has been our focus as we have worked with our members to protect consumers, maintain sound insurance markets, and deliver NAIC operations and member services virtually.

We've summarized the efforts and early results on behalf of the NAIC and our members in this first in a series of reports on the regulatory insurance response to COVID-19. Working with our members, we have delivered on many critical decisions and programs, and other work is in process as the crisis and associated issues continue to evolve.

Just as our members and the industry have had to quickly shift priorities and adjust to changing work requirements, our approach has been both flexible and focused. And clearly the issues are continuing to evolve.

This report catalogues our efforts from January 1, 2020 – May 31, 2020. The NAIC will continue to work with commissioners and their staff to assess the issues related to ongoing solvency of major U.S. carriers, the need for further regulatory relief in 2020, continued policymaker interest in business interruption insurance, policy engagement on COVID-19 health coverage issues, and other issues.

COVID-19 AND THE INSURANCE SECTOR

The outbreak of COVID-19 in the U.S. and globally led to a “perfect storm” of significant considerations that required the immediate attention and engagement of state insurance regulators, including:

- > Potential health and mortality threats of a new virus on millions of Americans.
- > Access to testing, treatment, and education critical for consumers.
- > Lack of accurate and credible information on COVID-19 as it relates to insurance coverages.
- > Impact of COVID-19 on the deferment of health care treatments.
- > Significant impacts as insurance consumers face unemployment, business interruption, workers' compensation claims, and potential inability to pay for critical coverages.
- > Historic levels of economic disruption on a global scale. U.S. insurers—while generally well capitalized and reserved—are not immune from this disruption.
- > Insurers face increased investment losses and operational disruption.
- > Increased political and regulatory uncertainty. The U.S. Congress has provided two economic rescue packages and may consider more that may either relieve or potentially exacerbate financial pressure on the insurance sector.
- > State insurance departments are increasingly being pressured to deal with policy, data collection, and regulatory relief actions on a more uniform and consistent manner.

REGULATORY RESPONSE TO COVID-19

2020 MILESTONES

2020



JAN 11
China Reports First "Known" COVID Death

JAN 20
First Confirmed Case in the U.S.

JAN 23
Wuhan Closed Off

FEB 11
WHO Names New Virus "COVID-19"

FEB 23
Italy Sees Surge in COVID Cases

FEB 29
U.S. Reports First COVID Death

MAR 11
WHO Declares Pandemic;
U.S. Blocks All Travel from Europe;
NBA Suspends Season

JAN 1

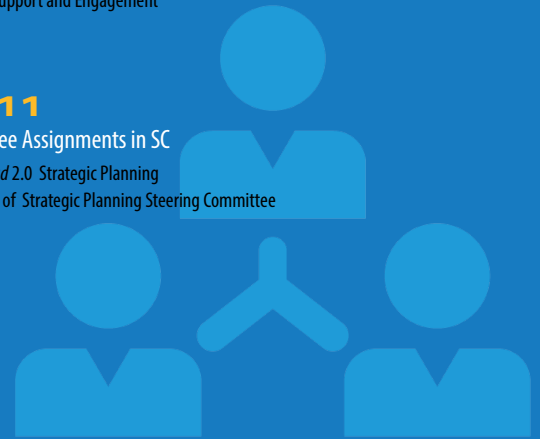
Begin Year with Focus on 2020 Strategic and Operational Priorities

- *State Ahead* 1.0 Strategic Plan Implementation
- Culture and Diversity
- Leadership Development and Succession Planning
- SERFF Assessment
- Member Support and Engagement

JAN 9-11

NAIC Committee Assignments in SC

- *State Ahead* 2.0 Strategic Planning
- Formation of Strategic Planning Steering Committee



JAN 29

Meeting with IAIS and Stakeholders in DC

- Continued Push for Recognition of U.S. Aggregation Method

FEB 12-15

NAIC Commissioners Conference in FL

- Agreement on Strategic Regulatory and Operational Priorities
- *State Ahead* 2.0 Planning
- International Policy Discussion

FEB 17-21

NAIC Revised Business Continuity Plan (BCP) to Address Pandemic Developments

FEB 24-29

IAIS Meetings in Basel, Switzerland

- Discussion of Asian Response to COVID-19

MAR 2

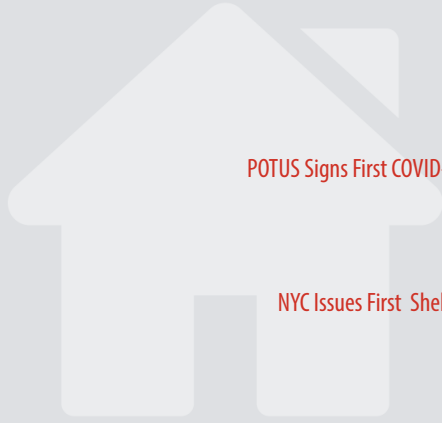
NAIC Coronavirus Resource Center Launched

MAR 10-12

"The Pivot Point"

NAIC Decides to Cancel In-person Spring National Meeting





MAR 13

POTUS Declares National Emergency

MAR 18

POTUS Signs First COVID-19 Relief Package

MAR 20

NYC Issues First Shelter-in-Place Order

MAR 24

Japan Cancels 2020 Summer Olympics

MAR 26

U.S. Becomes Nation Hardest Hit by COVID-19

MAR 27

POTUS Signs \$2 Trillion Stimulus Package

MAR 30

DC, MD and VA Issue Stay-at-Home Orders

APR 2

Worldwide COVID Cases Hit 1 Million, with 51,000 Confirmed Deaths

APR 10

Global COVID-19 Deaths Pass 10,000

MAR 12

Officer/Committee Leadership Call on Virtual National Meeting Alternatives

MAR 13

NAIC Continuity of Ops Plan Triggered; DC/NY Offices Begin Remote Operations

MAR 17-18

Remote Operations Pilot Test for KC Office; KC Office Begins Remote Operations

MAR 20

NAIC Holds Special Session on COVID-19 (Over 2,700 Attendees)

MAR 24

Work Begins with NAIC Officers on COVID-19 "Priority One" Initiative

MAR 25

NAIC Issues Statement on Retroactive Business Interruption

MAR 27

NAIC Issues Real Estate Forbearance Accounting Guidance

APR 1

NAIC Issues Coordinated Data Call on COVID-19 Impact

APR 2

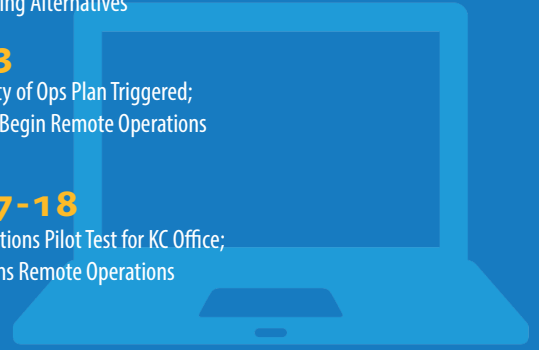
Executive (EX) Committee Call Approving "Priority One"

APR 6

NAIC Issues Model Bulletin on Regulatory Relief

APR 9

Member Call Approving "Priority One" Initiative; State Action Tracking System Rolled Out to Members



APR 14

IMF Warns of Worst Economic Downturn since Great Depression

APR 15

Europe Begins Easing Restrictions on Italy

APR 26

Global Death Toll Passes 200,000

APR 30

U.S. Airlines Require Face Masks

MAY 7

U.S. Unemployment Continues to Increase; 33 Million Jobless Claims in Past 7 Weeks

MAY 20

CDC Provides Guidance as States Begin to Open; Federal Reserve, FDIC and OCC Issue Principles for Offering Small Dollar Loans

MAY 21

U.S. House of Representatives' Small Business Committee Holds Virtual Hearing on Business Interruption Insurance

MAY 29

CDC Reports 1.7 Million Cases and 100,446 Deaths Related to COVID-19 in the U.S.

APR 15

NAIC Adopts Related Accounting Changes and Interpretations

APR 21

NAIC Capital Markets Bureau Issues Special Report: "Oil Futures Plunge Below Zero as Capital Markets Volatility Continues"

APR 30

NAIC Member Call Focused on Business Interruption and Health Issues

MAY 4

NAIC Forms Internal "Return to Office" Task Force

MAY 7

IAIS Issues Guidance on Business Interruption/Solvency Concerns

MAY 11

NAIC Issues Coordinated Data Call on Business Interruption

MAY 12

EX/EX1 Call Reviewing NAIC's Regulatory Response to COVID-19

MAY 14

Member Call Reviewing NAIC's Regulatory Response to COVID-19

MAY 20

NAIC Submits Comments to U.S. House of Representatives' Small Business Committee Virtual Hearing on Business Interruption Insurance

MAY 23

NAIC Capital Markets Bureau Issues Research: "U.S. Insurer CLO Exposure at Risk of Ratings Downgrade"



NAIC PRIORITY ONE

SUPPORTING OUR MEMBERS

NAIC PRIORITY ONE

The previously identified NAIC 2020 regulatory and operational priorities were founded on the assumption that we would be operating under normal market conditions. Clearly, this is no longer the case. As of March 2020, NAIC made supporting the efforts of U.S. insurance regulators in managing the impact of the COVID-19 pandemic its “**Priority One**”. Our efforts focus on the three critical areas of **(1)** protecting insurance consumers; **(2)** ensuring the ongoing stability and operation of our nation’s insurance sector; and **(3)** delivering exceptional member service.

CONSUMER PROTECTION

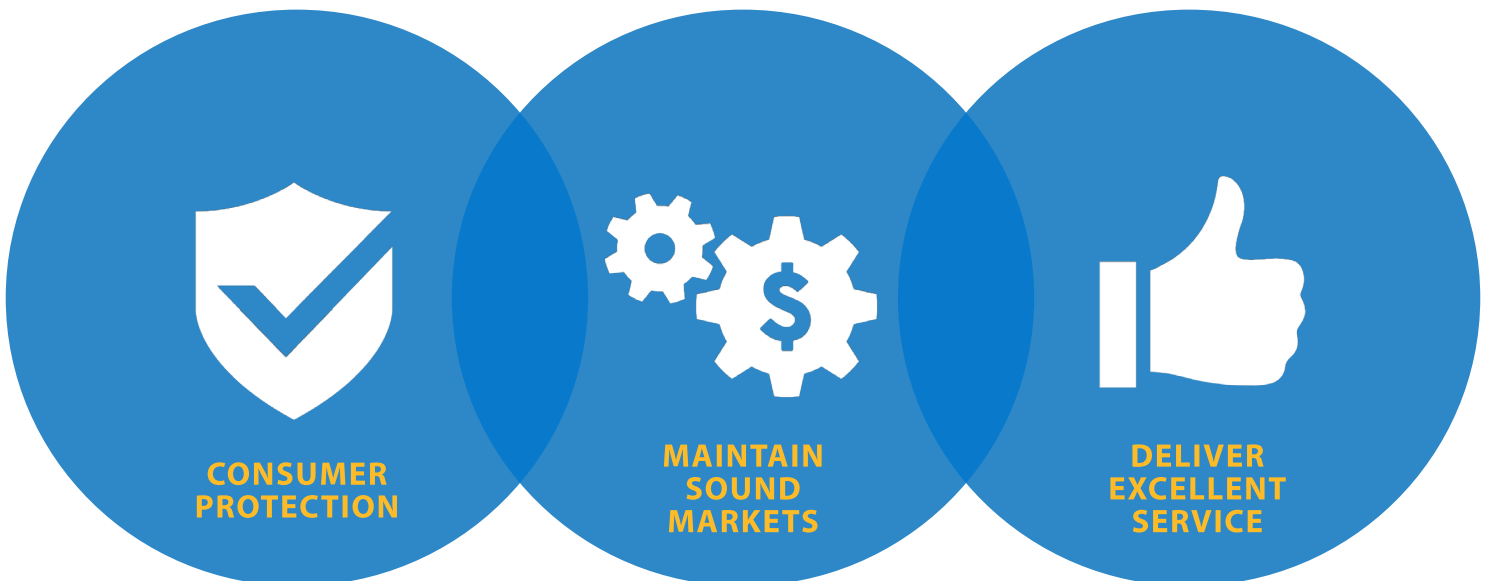
- > Coordinate state data collection efforts & promote consistency
- > Create a repository of state actions & best practices
- > Generate bulletins to educate consumers about the impact of the pandemic on insurance lines
- > Provide enhanced market analysis & surveillance on COVID-19 impact
- > Coordinate with global regulators
- > Collaborate with global regulators and advise policymakers

MAINTAIN SOUND MARKETS

- > Coordinate state data collection efforts & promote consistency
- > Create a repository of state actions & best practices
- > Provide enhanced market analysis & surveillance on COVID-19 impact
- > Coordinate with global regulators

DELIVER EXCELLENT SERVICE

- > Facilitate ongoing & frequent member communications using virtual platforms
- > Assess & meet evolving member needs
- > Provide targeted training & education
- > Ensure resiliency & ongoing operation of core NAIC services



CONSUMER PROTECTION

State insurance departments took quick actions in response to the crisis to protect vulnerable and anxious consumers whose lives were being touched by COVID-19 in very real ways. These steps included prohibiting carriers from terminating insurance contracts due to non-payment and waiving late fees. Some states also instructed carriers to adjust claims as expeditiously as possible and to use remote adjustment options whenever possible. An index of state regulatory actions is attached at the end of this report.

At the NAIC, we worked to provide opportunities for state insurance departments to share actions and best practices and provide information directly to consumers through online resources. An index of NAIC actions is attached at the end of this report.

HEALTH INSURANCE

With access and affordability of COVID-19 testing and treatment a critical issue, state insurance departments took swift action to allow health insurance consumers to access testing without cost-sharing and worked to extend access to coverage for consumers. Nearly all states acted initially to remove consumer cost-sharing for COVID-19 testing. Some have gone further to disallow cost-sharing for COVID-19 treatment or for an eventual vaccine. Most states acted to clarify that insurers must cover early prescription drug refills and took other steps to facilitate access to needed drugs during the outbreak.

State insurance departments have also worked to expand access to telehealth services, in some cases lifting restrictions on methods of communication and reducing cost-sharing. Many state regulators also requested or required insurers to offer enrollees extended premium due dates, suspend cancellations, and offer greater flexibility for small business coverage. Some regulators also called on insurers to verify the adequacy of their provider networks, modify utilization review, inform enrollees of benefits, or adjust provider credentialing.

The NAIC continues to engage on a daily basis with federal agencies, like The U.S. Department of Health and Human Services (HHS) and Centers for Medicare and Medicaid Services (CMS), to provide a forum for coordination between state and federal efforts targeting health insurance. Similarly, the NAIC remains directly engaged with Congress to ensure federal efforts to stabilize or support health insurance markets are coordinated and effective.

LIFE INSURANCE

As with other lines of insurance, several states have required life insurers to defer premium payments and suspend cancellations and non-renewals. In some circumstances, consumers have up to a year to pay back any deferred payments. Life insurers have also been instructed to waive late fees and penalties, and allow payment plans for premiums payments to otherwise avoid a lapse in coverage in other states.

AUTO INSURANCE

Many states have mandated or encouraged auto insurance companies to institute paybacks to drivers, who have greatly reduced miles driven during the pandemic. The announced refunds, discounts, dividends and credits are estimated to total more than \$10 billion.

CONSUMER RESOURCES

To help consumers, legislators and business owners understand the impacts of COVID-19 on insurance, the NAIC created a Coronavirus Resource Center and outreach program. The website provides access to third-party information and resources, as well as information specifically created by the NAIC. NAIC resources include research, information on coverages and exclusions related to health, travel, life, business interruption, event cancellation, workers' compensation, general business liability, and directors and officers insurance, as well as annuities. It also includes a database of more than 1,000 state bulletins, actions, and alerts to help the public keep track of state insurance actions taken across the country to protect consumers and ensure market solvency.



1,000+
STATE BULLETINS,
ACTIONS, & ALERTS

State actions are characterized as orders when they require insurers to take an action. They are characterized as requests when they encourage insurers to take an action. Notices advise insurers, consumers, or others of relevant information.

As with many crises, fraud is also a major concern. States insurance departments and the NAIC have issued warnings to consumers about potential COVID-19-related scams, such as robocalls and text messages advertising bogus miracle cures, free at-home test kits, home cleaning that scammers claim will reduce the risk of getting COVID-19, and assistance with obtaining federal government stimulus checks.

The NAIC has also fielded multiple requests for relief from 22 industry, consumer and health provider associations. Many of these have resulted in new draft bulletins and committee discussions.



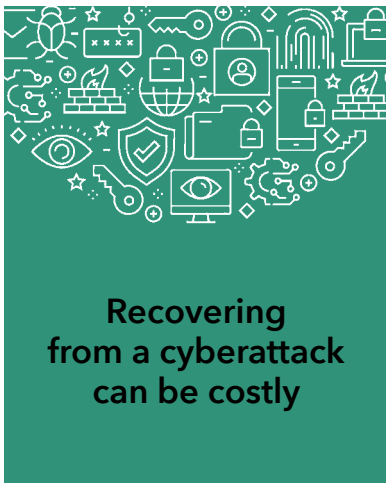
Hunting for an Event Space?
BEFORE YOU SAY YES,
LEARN ABOUT YOUR
INSURANCE OPTIONS

BUSINESS INCOME LOSS COVERAGES

- BUSINESS INTERRUPTION INSURANCE
- EXTRA EXPENSE COVERAGE
- SERVICE INTERRUPTION CLAUSE
- CONTINGENT BUSINESS INTERRUPTION
- CIVIL AUTHORITY COVERAGE



CONSUMER INSIGHT
Taking a Trip? **Information About Travel Insurance You Should Know Before You Hit the Road**



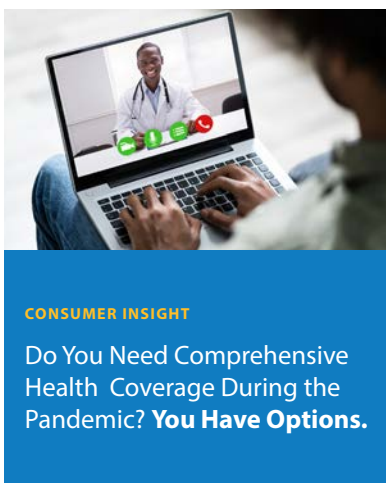
Recovering from a cyberattack can be costly



NAIC INSURANCE BRIEF
COVID-19 AND INSURANCE



Does Coronavirus Have You Worried About Your Pet?



CONSUMER INSIGHT
Do You Need Comprehensive Health Coverage During the Pandemic? **You Have Options.**



SELF-QUARANTINE AFTER A SHELTER STAY DURING THE PANDEMIC



THE REGULATORS
SEASON 2 EPISODE 5
KANSAS COMMISSIONER VICKI SCHMIDT

Discussing Storm Season, COVID-19 and Innovation

MAINTAIN SOUND MARKETS

State insurance regulators and the NAIC have been closely monitoring the financial health of insurers to ensure their continued strength and resilience. This work will continue as the crisis evolves.

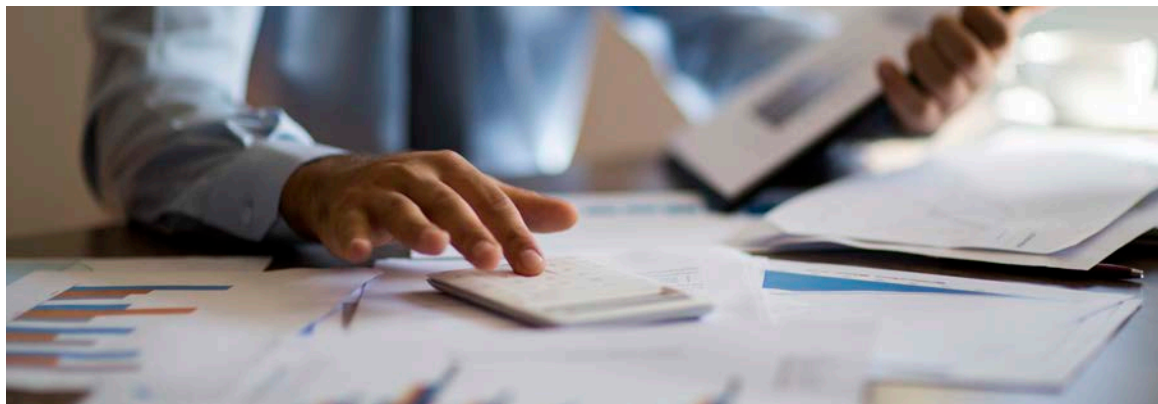
FINANCIAL SOLVENCY

The NAIC has also been working with state insurance departments to identify and evaluate company exposure to COVID-19, including monitoring the capital markets and providing reports to the states for their use in evaluating the potential impact of the economic downturn on insurance company assets. Evaluating company exposure has involved identifying those companies whose products put them at a greater risk of being impacted, as well as those companies facing an increased risk as a result of the interest rate cuts and market downturn.

State insurance departments have worked together—through the NAIC—to develop a national information request template that gathers initial data from insurers on their exposure to potential COVID-19 claims and the impact of the related economic downturn on their assets. More specific data requests from property/casualty insurers who write lines that could be impacted by COVID-19 — such as business interruption, workers’ compensation and travel insurance — have also been developed. State insurance regulators have also worked with life insurers to evaluate the impact of the economic stresses on their liquidity.

The NAIC also finalized a resource and guidance document of COVID-19 assumptions state regulators may use when reviewing health insurance carrier rate submissions for 2021.

In addition, the NAIC has provided input on the U.S. response to a survey by the International Association of Insurance Supervisors (IAIS). To date, they have nearly 60 responses from around the globe. The NAIC is contributing to a similar cross-sectoral survey being conducted by the international Financial Stability Board.



NEW ACCOUNTING AND REPORTING GUIDANCE

The NAIC worked with members to provide new accounting and reporting guidance for including the treatment of overdue mortgages and due dates of quarterly filings to provide some relief and guidance for insurers — and, by extension for business owners — by allowing more time for the insurers to collect premium receivables before reporting the receivables as nonadmitted in the statutory financial statements. The NAIC also plans to address rate and form review in light of premium discounts and rebates for non-use of personal vehicles during shelter-in-place orders.



BUSINESS INTERRUPTION INSURANCE

State insurance departments have issued guidance regarding coverage for coronavirus in a standard business interruption policy. The guidance has alerted business owners that many (83%) of policies have exclusions for virus, bacteria and pandemics and most (98%) requires a physical loss. It also encourages consumers to read their policy to determine if coverage exists.

The pandemic has caused massive disruptions to businesses. The American Property Casualty Insurance Association (APCIA) estimates that business revenue losses for small businesses (less than 100 employees) are between \$255 billion and \$431 billion a month, which dramatically exceeds the amount of premiums collected. The NAIC released a statement detailing concerns and opposition to any legislative proposals relating to retroactively altering the business interruption provision of policies to include new coverages that were not contemplated or funded and, in many cases, were specifically excluded by the policy.

State insurance regulators are committed to working at the state and federal level to help mitigate the devastating economic impacts of the coronavirus (COVID-19) pandemic. For example, states have already taken swift action to allow health insurance consumers to access COVID-19 testing without cost-sharing, and working to extend access to coverage for consumers where states are empowered to do so. Given the current condition of the financial markets, state regulators and the NAIC are also closely monitoring the financial health of insurers to ensure their continued strength and resilience.

We thank Congress and the Administration for acting quickly to give states greater flexibility to protect consumers and deal with ever-changing market dynamics, and we look forward to continuing that partnership as issues arise. However, as Congress considers further legislative proposals to address the devastating impacts of the COVID-19 pandemic, we would caution against and oppose proposals that would require insurers to retroactively pay unfunded COVID-19 business interruption claims that insurance policies do not currently cover.

Business interruption policies were generally not designed or priced to provide coverage against communicable diseases, such as COVID-19, and therefore include exclusions for that risk. Insurance works well and remains affordable when a relatively small number of claims are spread across a broader group, and therefore it is not typically well suited for a global pandemic where virtually every policyholder suffers significant losses at the same time for an extended period. While the U.S. insurance sector remains strong, if insurance companies are required to cover such claims, such an action would create substantial solvency risks for the sector, significantly undermine the ability of insurers to pay other types of claims, and potentially exacerbate the negative financial and economic impacts the country is currently experiencing.

Moving forward, if Congress believes the business interruption insurance sector can play a vital role in addressing the policy challenges of future pandemics, we stand ready to work with Congress on such solutions. However, swift action by Congress to directly address the needs of citizens and our economy is the most effective and expedient means to addressing the devastating impact of COVID-19.

PRODUCER LICENSING

The NAIC has worked with state insurance departments on a variety of issues designed to maintain the integrity of reporting and license requirements, while at the same time streamlining processes to work effectively with shelter-in-place orders.

Insurance producers are in direct contact every day with Americans, helping them make critical decisions on financial and personal welfare. Our obligation is to ensure those producers have the knowledge and personal integrity to fulfill those responsibilities.



The NAIC worked with the National Insurance Producer Registry (NIPR) on recommended best practices and a bulletin template for guidance on the implementation of a temporary license for insurance producers which distributed to the states. Together, we continue to do the technical work required for state insurance departments to extend renewal deadlines or offer temporary licenses electronically through NIPR.



OTHER WORK INCLUDED

- > Support for virtual inspections and the use of new technologies
- > The use of telemedicine for workers' compensation claims
- > Delays and suspensions of in-person audits
- > Suspension and relief from notary and first-class mail requirements, while allowing the use of electronic signatures
- > Expedited review of life insurance products

DELIVER EXCELLENT SERVICE

Our agility was tested in March as we triggered the NAIC's Business Continuity Plan and moved our teams to remote operations. Additionally, in March we made the decision to cancel our in-person Spring National Meeting due to concerns about the health and safety of our members, employees and attendees. We reprioritized our efforts to allow our members and staff more time to focus on the health emergency. At the same time, we sought new and innovative ways to maintain stakeholder engagement and transparency of NAIC proceedings.

VIRTUAL SPECIAL SESSIONS

On March 20, we held a virtual special session on COVID-19. The public session was attended by 2,700 interested parties. Attendees heard presentations on virus pathology, pandemic modeling, financial impact, and policy coverage issues. The session also included panel discussions about the impact of COVID-19 on the health insurance market, insurer readiness, and various consumer issues.

Special Session on COVID-19

HOSTED BY NAIC PRESIDENT & SOUTH CAROLINA INSURANCE DIRECTOR RAY FARMER

MARCH 20, 2020 at 2:00 PM ET



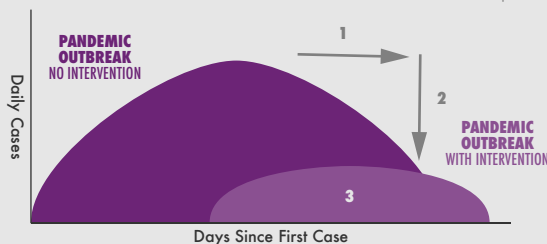
THE ROAD AHEAD

- REQUEST VS. REQUIRE
- TESTING VS. TREATMENT
- PREMIUM GRACE PERIODS
- SURPRISE MEDICAL BILLS
- NON-ACA COMPLIANT PRODUCTS
- TESTING VS. TREATMENT
- ERISA PREEMPTION OF SELF-INSURED PLANS
- RATES, RISK ADJUSTMENTS, RESERVES

manatt

RISK MANAGEMENT SOLUTIONS Non Pharmaceuticals Intervention

1. Delay outbreak peak
2. Decompress peak on hospitals/infrastructure
3. Diminish overall cases and health impacts



STATES' HEALTH INSURANCE MARKET RESPONSE

1:15 PM ET - 1:35 PM ET

Jessica K. Altman

PA INSURANCE COMMISSIONER

This first session was followed by a regulator-to-regulator session that enabled our members to have a robust discussion about the stability of the insurance sector, possible issues that may need attention in the near-term, and what is being done at the state level.

Since that time, we have hosted several other virtual conversations with our members to address best practices and address important issues. Additionally, various NAIC committees continue to meet in virtual public and regulator-to-regulator sessions. As we move forward, we anticipate that this practice will become more common.

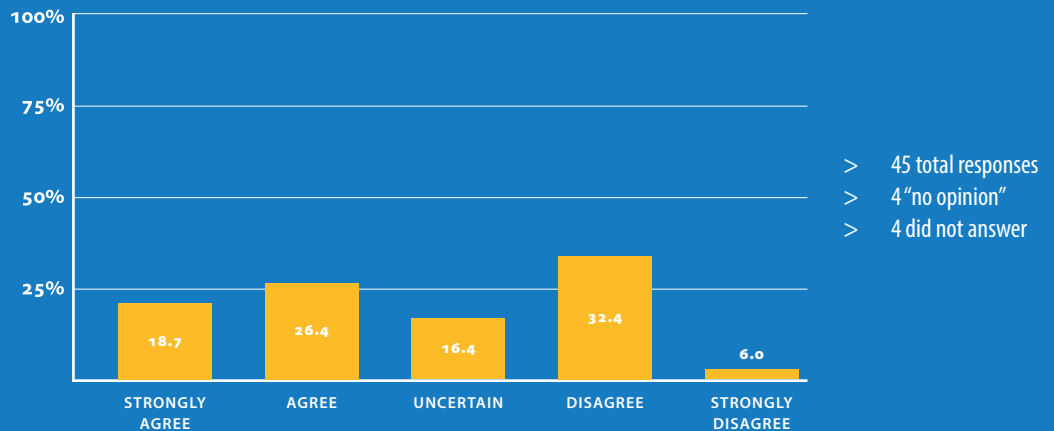
RESEARCH

The NAIC's independent research division, the Center for Insurance Policy and Research (CIPR), maintains a current list of research reports, articles, and other resources relating to pandemics, as well as compiled key historical learnings from NAIC Proceedings and a recent CIPR symposium on pandemics. Working in partnership with the academic community, the CIPR partnered with the Wisconsin School of Business (WSB) Insurance Experts Panel to weigh in on business interruption insurance and special enrollment periods, publishing the survey results to help advance discussion around these key public policy issues. The NAIC's *Journal of Insurance Regulation* issued a special call for research articles related to COVID-19 and how it will continue to impact the insurance industry and its regulation from an operational, business, and investment perspective.

PANDEMIC BUSINESS INTERRUPTION INSURANCE INSIGHTS FROM WSB SURVEY OF INSURANCE EXPERTS

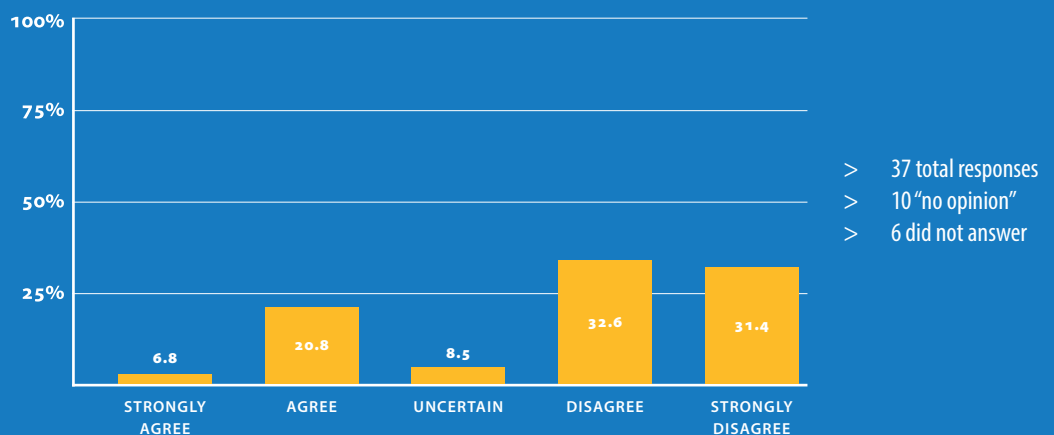
SURVEY QUESTION 3

Only the federal government can help provide business interruption insurance for pandemic risks.



SPECIAL ENROLLMENT PERIODS FOR HEALTH INSURANCE MARKETPLACES INSIGHTS FROM WSB SURVEY OF INSURANCE EXPERTS

Opening special enrollment periods for health insurance marketplaces during the COVID-19 pandemic is not a necessary policy because there are sufficient existing special enrollment rules and Medicaid access that provide health insurance access to those who need it.





EMERGING ISSUES

- > **OPERATIONAL TRANSITION ISSUES**

- > **ONGOING SOLVENCY MONITORING**

- > **TARGETING FRAUD AND CONSUMER ABUSE**

- > **FURTHER REGULATORY REQUESTS**

- > **CONTINUED PRESSURE ON BUSINESS INTERRUPTION INSURANCE**

- > **RELATIONSHIP BETWEEN BUSINESS INTERRUPTION CLAIMS CAUSED BY COVID-19 AND CLAIMS ARISING FROM RECENT RIOTING AND LOOTING**

- > **ENGAGEMENT ON HEALTH COVERAGE ISSUES RELATED TO COVID-19**

- > **INCREASED DATA CALLS**

- > **IMPACT ON INTERNATIONAL INITIATIVES**

INDEX OF ACTIONS BY COMMITTEE

ATTACHMENT A

ACTIONS BY COMMITTEE

HEALTH INSURANCE & MANAGED CARE (B) COMMITTEE

- > Serving as a public forum for stakeholders to submit requests for regulatory flexibility for state insurance regulators' consideration related to specific areas due to COVID-19, such as prior authorization, claims filing, form filing, and telehealth requirements
- > Held a conference call discussing some of these stakeholder requests
- > Anticipates developing and finalizing a resource and guidance document of COVID-19-related assumptions that state insurance regulators may use when reviewing carrier rate submissions for 2021
- > Tracking state actions related to COVID-19 and health insurance; in particular, 2021 rate filings

PROPERTY & CASUALTY INSURANCE (C) COMMITTEE

- > Received comments from industry and consumer groups regarding a coordinated state response to COVID-19 issues
- > Issues include ongoing business operations, such as claims handling, notification requirements, and use of virtual and technology-based means for inspections and adjusting
- > Concerns also include regulatory oversight considerations, such as premium discounts or rebates, rate and form approval, and exceptions to credit-based insurance scores
- > Assisted State Insurance Departments in issuing a COVID-19 Data Call
 - **Part 1** includes information on business interruption, including written premium, number of policies, and percentage of policies with language specific to physical damage and exclusions for virus or pandemic
 - Preliminary findings show that nearly 8 million commercial insurance policies include business interruption coverage
 - Of that amount, 90% were for small businesses, as defined as having 100 or fewer employees; 8% for medium businesses, and 2% for large businesses
 - Significantly, 83% of all policies included an exclusion for viral contamination, virus, disease, or pandemic and 98% of all policies had a requirement for physical loss
 - **Part 2** includes additional information on Business Interruption including claims and loss amounts
 - Additional data calls are still being contemplated by a regulator-to-regulator drafting group with input from industry
 - Future data calls could include additional lines of business such as travel insurance, event cancellation, general liability, directors and officers, workers' compensation, and medical professional liability

CASUALTY ACTUARIAL & STATISTICAL (C) TASK FORCE

- > Discuss session rate and form review in light of premium discounts and rebates for non-use of personal vehicles during shelter-in-place orders

WORKERS' COMPENSATION (C) TASK FORCE

- > To discuss use of telemedicine and other regulatory issues arising from COVID-19

MARKET REGULATION & CONSUMER AFFAIRS (D) COMMITTEE

- > Fraud issues arising from the crisis
- > Temporary licensing for producers; onboarding new producers
- > Use of technology for claims settlement
- > Regulatory relief for companies in claims settlement
- > Tracking and coding of complaints and regulatory actions
- > Adjuster licensing

STATUTORY ACCOUNTING PRINCIPLES (E) WORKING GROUP

- > Provided three accounting interpretations related to COVID-19
- > Statutory accounting exceptions allow insurance reporting entities to respond to policyholder needs for premium payment delays, and address mortgage loan modification or forbearance requests, while mitigating insurance reporting entity concerns on the impact to statutory financial statements

INTERNATIONAL INSURANCE RELATIONS (G) COMMITTEE

- > Worked on a number of activities at the international level and COVID-19 has had an impact on planned international workstreams and events
- > Responding to COVID-19 has been the focus of the International Association of Insurance Supervisors (IAIS)
 - Held regular calls to share experiences in dealing with the current situation and conducted a survey to collect information on jurisdiction responses
 - Work on comparability between the insurance capital standard and aggregation method has continued; however, the consultation on principles for assessment criteria will be delayed from July to later in 2020
 - Other IAIS papers scheduled for public consultation have been deferred by at least six months
 - IAIS and other international organizations' in-person meetings have been canceled for much of the rest of the year. This includes the IAIS committee meetings and global seminar the NAIC was planning to host in June, as well as the November committee meetings

INDEX OF ACTIONS BY STATES

ATTACHMENT **B**

LIFE & HEALTH

	CUSTOMER COST-SHARING	TELEHEALTH	PREMIUMS/CANCELLATIONS	PRESCRIPTION DRUGS	SPECIAL ENROLLMENT PERIODS	RATES AND FORMS REVIEW	STATUTORY FILINGS	OTHER
ALABAMA	●	●	●	●				●
ALASKA	●	●	●	●		●	●	●
ARIZONA	●	●	●				●	●
ARKANSAS	●	●	●	●			●	●
CALIFORNIA	●	●	●		●		●	●
COLORADO	●	●	●	●	●	●		●
CONNECTICUT	●	●	●	●	●	●	●	●
DELAWARE	●	●	●	●				●
DISTRICT OF COLUMBIA	●	●	●	●	●	●	●	●
FLORIDA	●	●	●	●			●	
GEORGIA	●		●			●		●
HAWAII			●			●		
IDAHO	●	●	●	●			●	●
ILLINOIS	●	●	●	●		●		●
INDIANA	●	●						
IOWA	●	●	●					
KANSAS	●					●		
KENTUCKY	●	●		●		●	●	●
LOUISIANA	●	●	●	●				●
MAINE	●	●	●	●		●	●	●
MARYLAND	●		●	●	●	●	●	●
MASSACHUSETTS	●	●	●		●			●
MICHIGAN	●	●	●	●		●	●	
MINNESOTA	●	●		●	●	●	●	●
MISSISSIPPI	●	●	●			●	●	
MISSOURI	●	●	●	●		●		●
MONTANA	●							
NEBRASKA	●	●				●	●	●
NEVADA	●	●		●	●			●
NEW HAMPSHIRE	●	●	●	●		●		●
NEW JERSEY	●	●	●					●
NEW MEXICO	●	●	●	●				●
NEW YORK	●	●	●	●	●			●
NORTH CAROLINA	●	●				●		●
NORTH DAKOTA	●	●				●		●
OHIO	●	●	●	●		●	●	●
OKLAHOMA	●	●	●	●			●	●
OREGON	●	●	●			●		
PENNSYLVANIA	●	●	●	●		●		●
RHODE ISLAND	●	●		●	●			●
SOUTH CAROLINA	●	●	●	●			●	●
SOUTH DAKOTA	●	●	●	●				●
TENNESSEE	●	●		●		●	●	●
TEXAS	●	●	●	●				●
UTAH	●	●		●			●	●
VERMONT	●	●		●	●	●		●
VIRGIN ISLANDS	●						●	
VIRGINIA	●					●	●	●
WASHINGTON	●	●	●	●	●			●
WEST VIRGINIA	●	●	●	●				●
WISCONSIN	●	●	●	●		●		●
WYOMING	●	●						
TOTAL JURISDICTIONS WITH ACTION	51	45	36	34	12	26	22	41

PROPERTY & CASUALTY

	AUTO INSURANCE	BUSINESS CONTINUITY	BUSINESS INTERRUPTION	CLAIMS HANDLING	GENERAL INFORMATION	LICENSING
ALABAMA	●			●	●	●
ALASKA						
ARIZONA					●	●
ARKANSAS	●		●	●	●	●
CALIFORNIA	●		●		●	●
COLORADO	●		●	●	●	●
CONNECTICUT	●		●		●	●
DELAWARE	●				●	
DISTRICT OF COLUMBIA			●		●	
FLORIDA	●	●		●	●	●
GEORGIA	●		●		●	●
GUAM						
HAWAII	●				●	●
IDAHO	●		●	●	●	●
ILLINOIS	●				●	●
INDIANA			●		●	●
IOWA					●	●
KANSAS			●		●	●
KENTUCKY	●				●	●
LOUISIANA	●		●		●	●
MAINE		●		●	●	●
MARYLAND	●		●	●	●	●
MASSACHUSETTS	●		●		●	●
MICHIGAN	●			●		●
MINNESOTA			●		●	●
MISSISSIPPI			●		●	●
MISSOURI			●			●
MONTANA						
NEBRASKA						●
NEVADA				●	●	●
NEW HAMPSHIRE	●		●		●	●
NEW JERSEY	●				●	●
NEW MEXICO	●					
NEW YORK		●			●	●
NORTH CAROLINA	●		●		●	●
NORTH DAKOTA			●		●	●
OHIO	●				●	●
OKLAHOMA		●	●		●	●
OREGON	●			●	●	
PENNSYLVANIA						●
RHODE ISLAND				●		●
SOUTH CAROLINA			●		●	●
SOUTH DAKOTA						●
TENNESSEE					●	
TEXAS				●	●	●
UTAH	●			●	●	●
VERMONT	●		●		●	●
VIRGIN ISLANDS		●			●	●
VIRGINIA	●		●	●	●	●
WASHINGTON	●		●	●	●	●
WEST VIRGINIA		●		●	●	●
WISCONSIN			●		●	●
WYOMING						●
TOTAL JURISDICTIONS WITH ACTION	26	6	24	16	42	45

PROPERTY & CASUALTY

	MARKET CONDUCT	NOTARY	RATES AND FORMS	REQUESTS FOR INFO	STATUTORY FILINGS	TRAVEL INSURANCE	WORKERS' COMPENSATION
ALABAMA	●	●					
ALASKA	●		●		●	●	●
ARIZONA	●	●			●	●	
ARKANSAS	●	●	●		●		
CALIFORNIA	●	●	●	●	●		●
COLORADO	●		●				●
CONNECTICUT	●				●	●	●
DELAWARE	●	●					●
DISTRICT OF COLUMBIA	●		●		●	●	●
FLORIDA	●				●		●
GEORGIA	●		●				●
GUAM							
HAWAII	●		●				●
IDAHO	●				●		●
ILLINOIS	●		●			●	●
INDIANA	●						●
IOWA						●	●
KANSAS	●		●			●	
KENTUCKY	●	●	●		●		●
LOUISIANA	●	●				●	●
MAINE	●				●	●	●
MARYLAND	●	●	●		●	●	●
MASSACHUSETTS	●						●
MICHIGAN	●		●		●	●	
MINNESOTA	●	●	●	●	●	●	●
MISSISSIPPI	●	●			●	●	●
MISSOURI	●		●				
MONTANA	●		●				●
NEBRASKA	●	●	●		●	●	
NEVADA		●				●	
NEW HAMPSHIRE		●	●			●	
NEW JERSEY	●						●
NEW MEXICO	●						●
NEW YORK	●			●		●	●
NORTH CAROLINA	●		●				●
NORTH DAKOTA	●					●	●
OHIO			●		●	●	●
OKLAHOMA	●				●		●
OREGON	●		●				●
PENNSYLVANIA	●		●				●
RHODE ISLAND							
SOUTH CAROLINA				●	●		●
SOUTH DAKOTA							●
TENNESSEE	●		●		●		
TEXAS	●		●			●	●
UTAH	●	●			●		●
VERMONT	●		●				●
VIRGIN ISLANDS	●			●	●		
VIRGINIA	●		●		●		
WASHINGTON	●			●		●	●
WEST VIRGINIA	●		●		●	●	
WISCONSIN	●		●				●
WYOMING							
TOTAL JURISDICTIONS WITH ACTION	44	14	27	6	23	22	37