

# A Report of the NAIC on the State of Insurance Regulatory Response to COVID-19

Update 2 / June 1 – Sept. 30, 2020



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# Introduction

COVID-19 has presented the world with the crisis of a lifetime in terms of its impact on people's lives, finances, and futures. While we have begun reopening, it's clear that we'll be facing challenges for a long time. New hotspots are emerging regularly. There is significant unemployment, the potential permanent closure of many businesses, and a still unfolding economic impact that will likely be in the trillions of dollars in the U.S. alone.

This report is the second in the series of reports on regulatory response summarizing the efforts and results on behalf of the NAIC and our members, and the nation's chief insurance regulators. Working with our members, we continue to take critical steps to protect insurance consumers and ensure stabilized insurance markets.

Our efforts, both recent and historic, have resulted in an insurance sector that continues to show strength and resiliency in this time of crisis. Even in the midst of a global pandemic, consumers continue to receive the benefits of their policies, which is particularly important given the natural catastrophes that have occurred at a historic pace across the country. We have also worked to advance the priorities set out in early March to work with our members to protect consumers, maintain sound insurance markets, and deliver NAIC operations and member services virtually.

We are not through this pandemic yet nor through the longer-term economic instability that it will likely leave in its wake. The issues continue to evolve, and we remain steadfast in our commitment to address them with flexibility and focus.

This report catalogues our efforts from June 1, 2020–Sept. 30, 2020. The NAIC will continue to work with commissioners and their staff on issues related to extending regulatory relief and reporting procedures to account for adjustments, health care policy for consumers, and the impact on business interruption insurance.



## COVID-19 & the Insurance Sector

In the spring of 2020, the insurance sector enacted a series of programs to respond to the initial events brought on by COVID-19. As we moved into the summer months and positive cases initially declined, several other considerations required attention from state insurance regulators including:

- > Emergence of new hotspots affecting the health and mortality of residents.
- > Continued business operation impacts, as local governments rolled back re-openings.
- > Resolving reporting questions arising from swiftly adapting programs to help alleviate consumer burdens from COVID-19.
- > Combatting the insurance impact of the pandemic while managing a historically active hurricane and wildfire season.
- > Responding to the social justice movement that gained national attention.
- > Alerting consumers to fraud schemes that often emerge during chaotic times.
- > Frequent engagement with Congress and federal agencies on the impact of COVID-19 on insurance policy holders and markets.

# Regulatory Response to COVID-19

June 1, 2020 – Sept. 30, 2020 Milestones

## June 10

U.S. COVID-19 cases hit **2 million**

## June 20

National Institutes of Health halted trial of hydroxychloroquine



## June 2

NAIC issues report on **U.S. Insurer Exposure to Bank Loans**

## June 18

NAIC issues report on **Collateralized Loan Obligations**

## June 30

NAIC issues report on **U.S. Insurers' Exposure to Mortgage Loans**



## July 1

NAIC issues report on **U.S. Insurers' Cash and Invested Assets Reach at Year-End 2019**

## July 7

U.S. officially notified the UN of its withdrawal from the World Health Organization (withdrawal is expected to take effect July 6, 2021)



**July 17**

U.S. sets world record highest single-day rise in cases at **77,638**



**July 22**

NAIC issues report on **U.S. Insurer Industry Outsourcing to Unaffiliated Investment Managers**



**July 22**

NAIC Adopts INT for COVID-19 Related Refunds



**July 28**

NAIC's Virtual Summer National Meeting Begins (3 week program)



**August 10**

NAIC holds Special Session on COVID-19 Lessons Learned (**2,737 attended**)



**August 11**

NAIC provides Rules for Auto Insurers to Follow When Reporting Policy Refunds



**August 14**

NAIC issues a report on **Private Equity (PE) Owned U.S. Insurers**



**August 24**

First case of reinfection was reported in Hong Kong

**August 31**

U.S. surpasses **6 million** COVID-19 cases



**September 22**

U.S. death toll hits **200,000**

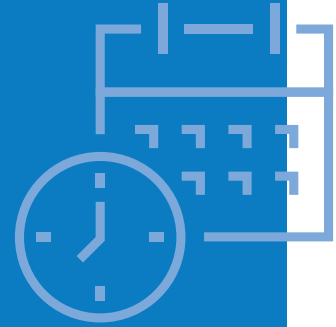
**September 29**

Global death toll hits over **1 million**

**August 17**

NAIC Extends INT Several Reporting Rules through Third Quarter:

- > 90-day rule
- > Mortgage Loan Impairment Assessment
- > Investment Income Due and Accrue



**August 28**

NAIC issues a Report on **U.S. Insurance Industry's High-Yield Bond Exposure**

**August 31**

SBS Submits License Expiration Date Extensions

**September 2**

NAIC issues a Report on **U.S. Insurer Total Exposure to Schedule 8A**

**September 8**

NAIC's Virtual Insurance Summit begins (2 week program)

**September 22-24**

Virtual Meeting of the IAIS Executive Committee



# Key Actions



When COVID-19 took hold of the country the NAIC jumped into action revising our regulatory priorities for the year to help curtail the impact of the pandemic on the insurance industry. Specific details about our actions can be found in our first [Report of the NAIC on the State of Insurance Regulatory Response to COVID-19](#). Then, like now we remain focused on three critical areas:

- > Protecting insurance consumers
- > Ensuring stability in the insurance market
- > Delivering exceptional service

## Summary of key actions from June 1, 2020 – Sept. 30, 2020:

### CONSUMER PROTECTION

- > Continued to update the [NAIC Coronavirus Resource Center](#) with information from state regulators, the NAIC, and reputable third parties.
- > Continued to distribute educational resources about the impact of the pandemic on insurance lines.
- > Continued to warn about potential fraud risks.
- > Worked with regulators and consumers to mitigate the impact of COVID-19 as states dealt with a myriad of natural catastrophes.

### MAINTAIN SOUND MARKETS

- > Coordinated data collection on business interruption insurance.
- > Adjusted regulations to reflect challenges caused by COVID-19.
- > Coordinated with federal counterparts and other regulators across the world on the global response to pandemic impacts on multi-national insurance groups.
- > Continued to adjust NAIC software capabilities to streamline the process and enable remote business operations.

### DELIVER EXCELLENT SERVICE

- > Shifted communications to virtual platforms and maintained regular outreach to members and the stakeholder community.
- > Targeted training and education to regulators.
- > Provided assistance to states grappling with their response to natural catastrophes.
- > Ensured resiliency and ongoing operation of core NAIC services.



# Consumer Protection



State regulators continued the programs they enacted at the start of the pandemic to help protect consumers whose health and livelihoods have been affected. These initiatives include prohibiting carriers from terminating insurance contracts due to non-payment; waiving late fees; and in some states, requiring insurers to provide refunds or reduce premiums on certain policies.

At the NAIC, we continued to provide resources to consumers to educate them on COVID-19 changes to insurance and raise awareness and understanding of emerging scams. A complete list of actions can be found at the end of this report.

## Health Insurance

State insurance departments continued their efforts to ensure access and affordability for COVID-19 testing and treatment. When the pandemic began, nearly all states acted initially to remove consumer cost-sharing for COVID-19 testing.

As federal cost-sharing requirements emerged, states worked to communicate and implement the federal standards and offer feedback on their effectiveness. Some states have gone further, disallowing cost-sharing for COVID-19 treatments, including costs of a vaccine in the future.

Most states also acted to clarify that insurers must cover early prescription drug refills and they took other steps to facilitate access to medications during the outbreak. Almost all state-based marketplaces opened for new enrollment by individuals in need of coverage.



State insurance departments have also continued to work to expand access to telehealth services, in many 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 worked with insurers to provide premium holidays for certain types of coverage. Others called on insurers to verify the adequacy of their provider networks, modify utilization reviews, inform enrollees of benefits, and adjust provider credentialing.

The NAIC continues to engage with federal agencies, including 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 the U.S. Congress to ensure that federal efforts to stabilize or support health insurance markets are coordinated and effective.



### **Auto Insurance**

Early in the COVID-19 pandemic, insurance regulators understood that the pandemic was having a significant impact on consumer behavior, including the fact that many drivers were driving fewer miles. In April, 26 state departments of insurance issued bulletins urging insurers to issue immediate reductions in auto insurance premiums to reflect reduced driving. Some states granted consumer relief and mandated premium grace periods. Nearly all states urged consumers to contact their agent or carrier about possible premium reductions.

Insurance premium relief measures generally shaved 15–25% off customers' premium payments for one or more months during the spring and returned a reported \$14 billion to policyholders. State insurance property and casualty regulatory actuaries have been actively reviewing filings, working with insurers, and sharing information within the regulatory community about how to handle refund and rate change filings.

Auto insurers have been finding significant decreases in the frequency of accidents, but also an increase in the severity. Insurance companies have reported significant increases in speeding activity, which could be one of the reasons for the increasing cost of accidents. Currently, regulatory rate filing reviewers and actuaries are evaluating rate filings with close attention to major changes in data experience.

NAIC members expect companies to respond to changes in data, but not to overreact when the scope and duration of current impacts are not yet fully known. As policies are written for a future period, typically six months or one year, insurers need to evaluate the losses and reassess risk following that policy term rather than trying to price in “real time” within the policy period. As data has become more readily available over time and technology continues to advance, regulators have worked to ensure that insurers utilize data to better assess risk to more accurately price auto insurance policies. We anticipate that as usage-based pricing becomes more prevalent, the industry and regulatory community will have more data to evaluate the need for pricing modifications.

Insurance regulators continue to evaluate data to determine if long-term adjustments are needed to rating models and encourage consumers to shop for a better rate as auto insurance markets are typically very competitive with numerous carriers competing for consumers’ business.



### **Protecting Against Fraud and Improper Marketing**

As with many crises, fraud is a major concern. State 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 and state regulators continue to alert consumers and warn against improper marketing of health insurance. These tactics often

involve robocalls using the consumer's local area code offering health insurance plans from major insurers. Scammers will often direct the consumer to an out-of-state call center, offer coverage that is not with a major provider and sell policies with a more limited scope than presented.

### Natural Disasters

COVID-19 added a new dimension to disaster preparation in 2020. Working with guidance from FEMA and the CDC, the NAIC provided consumers with tips and advice to help consumers protect themselves, safely prepare, evacuate, and shelter in the event of a natural disaster, while protecting themselves and others from COVID-19.

While at a shelter for a disaster evacuation, **wear a mask/cloth face covering** as much as you can.



NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

### Consumer Resources

The NAIC continued to add new information to its Coronavirus Resource Center and outreach program helping consumers, legislators and business owners understand the impacts of COVID-19 on insurance and providing a one-stop-shop for reliable and up-to-date information. Additionally, we continued to proactively distribute information to consumers through social media, press releases, and in partnership with state departments of insurance.



NAIC Coronavirus Resource Center

STATE BULLETINS & ALERTS | NAIC RESOURCES | OTHER RESOURCES | INSURANCE POLICY COVERAGE | CONSUMERS

# Maintain Sound Markets



State insurance regulators and the NAIC monitored the financial health of insurers to ensure their continued strength and resilience. We collected data to understand the true impact the pandemic was having on carriers and implemented guidance to help reduce the burden on insurers and consumers. We continued to analyze the market impact as the crisis evolved extending guidance and enacting new procedures to respond to emerging issues. Thus far the U.S. market and the state-based insurance system behind it have proven their resiliency.



Data collected from regulators across the globe demonstrates that the COVID-19 global pandemic has had a major impact affecting all sectors of the economy, including insurance. In times of stress such as these, the regulatory systems in place to ensure insurers' solvency and policyholder protection are put to the test. A recent global report by Standard & Poor's, a rating agency that provides ratings to the global markets, analyzed how the insurance industry has dealt with COVID-19 and its impact on the industry's capital buffers. The report notes the overall resiliency of such buffers, and stress testing conducted found North American insurers to be the most resilient region globally. Such testing considers the overall capital strength, risk management and asset allocations of the insurers.

U.S. state insurance regulators attribute the resiliency of the region in part to improvements and advancements made to the regulatory system over the last decade, including those related to solvency, corporate governance and group supervision.



## Extension of Accounting and Reporting Guidance

At the start of the pandemic, the NAIC worked with members to provide new accounting and reporting guidance for the treatment of overdue mortgages. It also extended the due dates of quarterly filings to provide some relief and guidance for insurers—and, by extension business owners—by allowing more time for the insurers to collect premiums before reporting the payments as late in the statutory financial statements. Originally these guidelines were only allowed for first and second quarter reporting, but this guidance was extended to Sept. 30, 2020 to be applicable for third quarter financial statements as well.

## New Accounting Rules for Auto Insurers

The NAIC addressed the accounting issues related to auto insurers' refunds, rate reductions and policy dividends to consumers based on less driving due to shutdowns. It was decided that the default methodology would be to record it as a reduction in premium, but the guidance also offers flexibility for insurers that prefer to report through expenses in a one-time as a limited exception.

## Business Interruption

To date, nearly 200,000 claims have been reported by policyholders seeking reimbursement for lost income under business interruption coverage. Less than 1% of claims reported have been closed with payment and 74% of claims reported have been closed without payment.

This analysis is based on our work with state regulators to understand which insurers are writing business interruption coverage, the size of the market, the extent of exclusions related to COVID-19, and claims and losses related to COVID-19.





The analysis also showed that 83% of policies have exclusions for virus, bacteria and pandemics and nearly all (98%) require a physical loss for a claim. This is not surprising as insurance works well and remains affordable when a relatively small number of claims are spread across a broader group. It is therefore not typically well suited for a global pandemic where virtually every policyholder suffers significant losses at the same time for an extended period.



Several lawsuits were filed against insurers by the business community. To date, these lawsuits have focused on whether the virus causes direct property damage to an insured's place of business such that business interruption or civil authority coverage is triggered. At the federal level, there are a number of legislative proposals to address business interruption coverage gaps, so the NAIC adopted a policy position in October to guide our efforts in engaging with Congress as this issue moves forward.

We will continue to collect data on business interruption claims each month through November 2020.

### **Life Insurance and Annuity Interest Rates**

An NAIC committee began working on the Standard Nonforfeiture Law for Individual Deferred Annuities (#805) to drop the standard minimum nonforfeiture interest rate for individual deferred annuities from 1% to 0, due to the effects on interest rates because of COVID-19. This is expected to enable insurers to better weather the low interest rate environment.

### **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.



The NAIC and the National Insurance Producer Registry (NIPR) provided the technical and communications support

to 49 states to implement over 140 orders and bulletins related to producer licensing. Thirty-three states issued bulletins related to license renewals and 30 states issued bulletins related to temporary licensing, which provided licensees more time to complete state mandated pre-licensing or continuing education requirements. The NAIC's State Based Systems (SBS) continued to support its states throughout their response to COVID-19, by extending the expiration dates of more than 105,000 licensees in 11 states.

Insurance producers are in direct contact every day with Americans, helping them make critical decisions on financial and personal welfare. This need has been heightened during this time of economic uncertainty. Our obligation is to ensure that insurance companies can meet consumer demands for insurance products with producers who have the knowledge and personal integrity to fulfill those responsibilities.



The NAIC worked with NIPR on recommended best practices for the implementation of a temporary license for insurance producers, which was distributed to the states. NIPR held weekly industry update calls and created a COVID-19 resource center, found at [nipr.com](http://nipr.com), to provide an updated, central source of information about state bulletins, examination center information and a state's DOI updates. Together, we continue to do the technical work required for state departments of insurance to extend renewal deadlines or offer temporary licenses electronically through NIPR. Recognizing the need for a long-term solution to provide safe and secure access to producer examinations for new applicants while maintaining the security and integrity of examinations, state insurance regulators have turned their focus toward implementing remote, proctored examinations.

NAIC worked with state regulators to increase the number of states offering remote proctored exams from one in March 2020 to 21 as of Sept. 30, 2020, with additional states exploring the possibility of remote exams in the fourth quarter.

### **Financial Solvency**

In addition to providing relief for the treatment of overdue mortgages and the collection of premiums, other accounting guidance was developed to address specific issues arising related to certain invested assets for insurers. This includes guidance related to the Term Asset-Backed Securities Loan Facility (TALF) and the assessment of other than temporary impairments.

### **International Coordination**



Over the past months, coordination and communication with international counterparts has continued with bilateral dialogues with other jurisdictions and discussion on a variety of issues and sharing of experiences at the International Association of Insurance Supervisors (IAIS). The NAIC has provided updates to the IAIS survey on the supervisory response to COVID-19, which contains information from almost 70 jurisdictions around the globe.

In August, the International Monetary Fund (IMF) finalized the 2020 U.S. Financial Sector Assessment Program (FSAP) by publishing a number of reports with its findings and opinions on the U.S. financial regulatory system. There is an appendix addressing the impact of COVID-19 in both the IMF's Stress Testing Technical Note and the Financial System Stability Assessment; however, the FSAP was largely completed prior to the start of the pandemic.



## Deliver Excellent Service

As we quickly revamped our priorities to respond to the emerging issues stemming from COVID-19, like everyone, the NAIC moved all staff to remote work and priorities shifted. Our move to work from home was largely uneventful. But as the initial chaos of the pandemic subsided, we were able to resume some of our regular programs—in altered formats—while still providing up-to-date information on the pandemic’s impact on insurance.

Additionally, the NAIC demonstrated the ability to organizationally “flex” and take on emerging issues where NAIC member engagement was critical. The two biggest examples centered around racial equality/social justice and climate risk/resiliency. In both cases, NAIC members determined that our involvement in these issues was critical from both a market and consumer protection perspective. Over the course of just a few months, NAIC members approved two executive level task forces associated with these initiatives along with corresponding workstreams and deliverables. The pandemic is certainly a historic challenge for our financial services sector but global regulators must still remain vigilant and engaged on other critical issues that emerge during this time.



### Summer National Meeting

We broke attendance records with more than 2,900 people attending NAIC’s Virtual Summer National Meeting. The impact of COVID-19 and what happens next was a main discussion topic as we examined lessons

learned and the outlook for the road ahead. But it also enabled us to address some of the larger industry issues stemming out of the social justice movement happening this summer. We held a special session on race and insurance examining the role of the NAIC and state insurance regulators in addressing racially discriminatory practices in insurance.



## **Insurance Summit**

The Insurance Summit also went virtual and featured several guest speakers who shared their insights around how COVID-19 was affecting our way of life and suggested that we keep an eye on trends. Below are session topics related to COVID-19.

### **Remote Online Proctoring**

With COVID-19 and stay-at-home orders, states needed to quickly adapt their approach to proctored examinations. This session focused on the current state of testing centers and state implementation of remote, proctored exams. Panelists included Elizabeth Kelleher Dwyer (Superintendent, Rhode Island Division of Insurance) and Larry D. Deiter (Director, South Dakota Division of Insurance).

### **National Fraud Trends**

This session explored the new trends in insurance fraud, which included effects from the COVID-19 pandemic. It looked at these trends on both a national and global level with leaders from the Texas Department of Insurance, the NICB, the Coalition Against Insurance Fraud and BAE Systems.

### **Financial Analysis Update**

Led by Andy Daleo and Jane Koenigsman of the NAIC, this was a discussion of recent and ongoing enhancements to analysis handbook guidance, analysis tools and related sound practices. While providing updates on industry trends through the second quarter of 2020, it also included key considerations from the latest edition of the risk alert, including COVID-19 risks and procedures.

### **How COVID-19 is Changing Society—America Adapts!**

In a scenario-based approach, Grant McCracken- PhD walked participants through an examination of the cycles of decline and the decentralization of cities in general, then the changes this could provoke in society. He then dove into possible future scenarios to help inform planning and communication in 2020 and beyond.

### **Innovation and Technology State Contacts Roundtable**

Innovation and Technology State Contacts from across the U.S. discussed recent developments in InsurTech. Special emphasis was placed on technology implemented or expedited as a result of COVID-19.

### **Developed New Regulator-Only Platforms**

Developed a regulator-only collaboration website for sharing COVID-19 related information and created a new SharePoint document portal as an iPad alternative for NAIC members and senior insurance department staff to access meeting related documents.



### **Conversations with State Regulators**

We connected state regulators with industry and consumers through virtual meetings to get first-hand accounts of how state regulators have been handling the COVID-19 pandemic. We published special episodes of [The Regulators podcast](#) featuring candid conversations about the COVID-19 response with state insurance regulators including workplace transition and protecting consumers virtually.



# Appendix I:

## **Actions by Committee**

# Actions by Committee

## LIFE ACTUARIAL (A) TASK FORCE

- > Removed 4% floor from Life Standard Nonforfeiture Rate.
- > Proposed a change to Model #805 to allow an interest rate floor between .50% and 0%.

## 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 conference calls and national meeting sessions discussing some of these stakeholder requests.
- > Facilitated the development of 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, this includes 2021 rate filings.

## PROPERTY & CASUALTY INSURANCE (C) COMMITTEE

- > Assisted state insurance departments in issuing a COVID-19 Data Call on business interruption and exploring data calls for additional lines of business affected by COVID-19.
- > Collecting monthly data on business interruption claims through November 2020.
- > Collaborated among states on how to handle current and future auto insurance premium refunds and rate reductions.
- > Discussed assisting state insurance departments in collecting workers' compensation exposure data related to COVID-19. The NAIC is evaluating the collection of workers' compensation claims data related to COVID-19 as it becomes available.

## MARKET REGULATION & CONSUMER AFFAIRS (D) COMMITTEE

- > Fraud issues arising from the crisis .
- > Temporary licensing for producers; onboarding new producers; remote, proctored examinations.
- > Use of technology for claims settlement.
- > Regulatory relief for companies in claims settlement.
- > Regulator relief for companies filing Market Conduct Annual

Statement data.

- > Enhancing coding to track complaints and regulatory actions arising from “pandemics” and claims for “business interruption” coverage.

#### **STATUTORY ACCOUNTING PRINCIPLES (E) WORKING GROUP**

- > Extended guidance for three accounting interpretations related to COVID-19 through third quarter reporting.
- > Provided guidance for auto insurers who participated in premium refunds, rate reductions and policy dividends as a result of COVID-19.

#### **FINANCIAL REGULATIONS STANDARDS AND ACCREDITATION (F) COMMITTEE**

- > Shifted accreditation reviews to a virtual review model to ensure that the high standards in state regulation continue to be met.
- > Provided guidance to state insurance departments in meeting accreditation standards that are affected by COVID-19, such as filing deadlines and examination deadlines.

#### **INTERNATIONAL INSURANCE RELATIONS (G) COMMITTEE**

- > Facilitated the International Association of Insurance Supervisors (IAIS) collection of COVID-19 related data for quarter 1 and quarter 2.
- > Provided input to the IAIS survey on COVID-19 related policy and supervisory measures.
- > Contributed to the Organisation for Economic Cooperation and Development (OECD) workstream on the role of public-private partnerships to address the insurability of perils that are or are increasingly becoming uninsurable such as pandemic/epidemics, but also perils such as floods, wildfires, and cyclones whose severity and frequency are being affected by a changing climate.
- > Conducted several virtual supervisory cooperation calls with regulators from Asia, the Caribbean, Europe, and Latin America.

# Appendix II:

## **Actions by State**

# Life & Health

- Actions Taken Jan 1 – May 31
- Actions Taken Jun 1 – Oct 31

	CUSTOMER COST-SHARING	TELEHEALTH	PREMIUM/CANCELLATION	PRESCRIPTION DRUGS	SEPs	RATE & FORM REVIEW	STATUTORY FILLINGS	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	●	●						
<b>TOTAL</b>	<b>51</b>	<b>45</b>	<b>36</b>	<b>34</b>	<b>12</b>	<b>26</b>	<b>22</b>	<b>41</b>

# Property & Casualty

- Actions Taken Jan 1 – May 31
- Actions Taken Jun 1 – Oct 31

	AUTO INSURANCE	BUSINESS CONTINUITY	BUSINESS INTERRUPTION	CLAIMS HANDLING	GENERAL INFORMATION	LICENSING	MARKET CONDUCT	NOTARY	RATE AND FORM	INFORMATION REQUESTS	STATUTORY FILINGS	TRAVEL INSURANCE	WORKERS' COMPENSATION
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						●							
<b>TOTAL</b>	<b>27</b>	<b>6</b>	<b>26</b>	<b>17</b>	<b>46</b>	<b>47</b>	<b>44</b>	<b>15</b>	<b>29</b>	<b>7</b>	<b>25</b>	<b>22</b>	<b>39</b>