November 4, 2020

Superintendent Elizabeth K. Dwyer

Co-Chair, NAIC Producer Licensing (D) Task Force

Rhode Island Department of Business Regulation

Insurance Regulation Division

1511 Pontiac Avenue

Cranston, RI 02920

Director Larry D. Deiter

Co-Chair, NAIC Producer Licensing (D) Task Force

South Dakota Department of Labor and Regulation

Division of Insurance

124 South Euclid Avenue, 2nd Floor

Pierre, South Dakota 57501

Re: request to review producer licensure for pet insurance products.

Dear Superintendent Dwyer and Director Deiter:

Washington is a member of the Pet Insurance (C) Working Group and has been actively participating in the task of drafting a model law. That working group has recently entered the discussion phase relating to licensure of insurance producers who sell pet insurance products. It is evident from those discussion the question of pet insurance producer licensure is complex, broad reaching, and impactful.

While the Pet Insurance (C) Working Group has the subject matter expertise to have meaningful discourse on the emerging matters within the line of business, the questions of licensure relating to the reciprocity, uniformity and the appropriate line of authority is seemingly best served by our task force’s expertise. Washington respectfully requests the issue of producer licensure for pet insurance products be considered by the Producer Licensing (D) Task Force due to its multifaceted nature.

If there are questions regarding this matter, please do not hesitate to contact me at (360) 725-7156 or JeffB@oic.wa.gov

Sincerely,

Jeff Baughman, PIR, SILA-F

Producer Licensing & Oversight Program Manager

Consumer Protection Division