

Draft: 5/13/24

Market Analysis Procedures (D) Working Group  
Virtual Meeting  
April 29, 2024

The Market Analysis Procedures (D) Working Group of the Market Regulation and Consumer Affairs (D) Committee met April 29, 2024. The following Working Group members participated: Jo LeDuc, Chair (MO); John Haworth, Vice Chair (WA); Maria Ailor and Tolanda Coker (AZ); Don McKinley (CA); Tracy Garceau (CO); Steve DeAngelis (CT); Tina Ching (DC); Susan Jennette (DE); Paul Walker (FL); Erica Weyhenmeyer (IL); Kichelle Henderson (KS); Lori Cunningham (KY); Josh Guillory (LA); Mary Lou Moran (MA); Raymond Guzman (MD); Timothy N. Schott (ME); Jeff Hayden (MI); Bryce Wang (MN); Troy Smith (MT); Martin Swanson (NE); Douglas Rees (NH); Ralph Boeckman and Erin Porter (NJ); Larry Wertel (NY); Ryan McConnell (OH); Karen Veronikis (PA); Brett Bache (RI); Rachel Moore (SC); Melissa Gerachis (VA); Karla Nuisl (VT); and Rebecca Rebholz and Darcy Paskey (WI).

1. Adopted its Spring National Meeting Minutes

Veronikis made a motion, seconded by Haworth, to adopt the Working Group's Feb. 26 minutes (*see NAIC Proceedings – Spring 2024, Market Regulation and Consumer Affairs (D) Committee, Attachment xx*). The motion passed unanimously.

2. Adopted Pet Insurance MCAS Ratios

LeDuc said the proposed pet insurance Market Conduct Annual Statement (MCAS) ratios have been posted on the Working Group's web page since February, and two sets of comments have been received: one from the National Association of Mutual Insurance Companies (NAMIC) and the other from the North American Pet Health Insurance Association (NAPHIA). She said NAMIC's comments were about some data elements that may be difficult for companies to capture, which could result in misleading ratios. The comments from NAPHIA supported the ratios.

LeDuc said eight ratios will be publicly displayed on the MCAS scorecards page, and 26 ratios will only be made available to state insurance regulators.

Bache made a motion, seconded by Haworth, to adopt both the public and non-public pet insurance MCAS ratios (**Attachment --**). The motion passed unanimously.

3. Adopted the Requirement for Fraternal Companies to Annually Report MCAS

LeDuc said one set of comments has been received from the Pennsylvania Insurance Department. Veronikis said that after consulting with the department's legal team and deputy commissioner of market regulation, they continue to support removing the exemption for fraternal companies in MCAS.

Schott said Maine has no authority to require MCAS filings from fraternal companies and asked for an exception for Maine. LeDuc said there are a few states in the same situation, and since MCAS is collected state-by-state, a state can provide waivers to fraternal companies. Swanson said Nebraska continues to object to the inclusion of fraternal companies.

Gerachis made a motion, seconded by Veronikis, to remove the MCAS exemption for fraternal organizations and require them to file MCAS in states in which they meet the premium threshold. The motion passed with Nebraska voting against and Massachusetts abstaining.

Allison Koppel (American Fraternal Alliance—AFA) said the AFA continues to oppose removing the exemption. She said that companies need to be provided at least six months to prepare for reporting MCAS if it is removed. LeDuc said that the process of making changes to MCAS provides at least six months to prepare. Fraternal companies' first filings will be in 2026 for the 2025 data year.

#### 4. Discussed NAIC MIS Data

LeDuc said she and NAIC staff interviewed 26 jurisdictions about their use of the Market Analysis Prioritization Tool (MAPT). She said various small and large departments were included in the interviews. The summary of the interviews will be sent to the Working Group distribution lists after the Working Group's meeting. She said the summary will report on the 26 jurisdictions as well as Missouri's use of the MAPT.

LeDuc said the interviews revealed that the MAPT has value to jurisdictions, and there is widespread use of the MAPT, with only three not using the MAPT in their baseline analysis. She said Missouri is one of those, and it has its own back-end connection to the data, which it imports into its own processes. The interviews also revealed that there is room for improvement. She said the scores in the MAPT are not being used as originally intended. She said this could be because jurisdictions are not identifying the scoring values or there is a lack of documentation describing how the scores are determined. It was also revealed that the MAPT is used in many different, though similar, ways. She said there may be a need for MAPT to be more customizable. Lastly, using the MAPT for baseline analysis is a manual process with a lot of cutting, pasting, and sorting columns.

LeDuc said one of the Working Group's charges is "in accordance with the second recommendation of the adopted *Review of Artificial Intelligence Techniques in Market Analysis*, to assess currently available market analysis data to identify needed improvements in the effectiveness of the data for market analysis and the predictive abilities of the market scoring systems utilizing the data." LeDuc said the MCAS-MAPT also incorporates scoring and was not specifically addressed in the interviews on the MAPT; however, it was used in conjunction with the MAPT in most jurisdictions. She said the MCAS-MAPT could be the next Market Information Systems (MIS) tool to consider.

LeDuc said many jurisdictions are waiting to do their baseline analysis, so they combine their MCAS data with the MAPT. It would be good to find a way to combine the MCAS-MAPT and the MAPT. Haworth noted that Washington combines MCAS and the MAPT with Python and then exports the data into Excel. He said they do their own scoring because the scoring in MAPT and MCAS results in many false positives. LeDuc said combining the two at the NAIC for use in all jurisdictions would be better. Haworth said it is cleaner to download and query homeowners and auto. He said 256 columns are a lot to go through, and it is easier for Washington to just go through the data it needs. He said the MCAS-MAPT could be made more useful. Ailor agreed and said that historically, Arizona combined the MAPT and MCAS-MAPT for lines of business that were easy to combine, such as auto and homeowners. She said health is far too much to combine easily. She said this was a good time to discuss combining the two tools. Teresa Cooper (NAIC) said the NAIC is currently working on getting MCAS data in ThoughtSpot, and this will reduce the number of tables from 11 to only two.

LeDuc said the built-in scoring in the MAPT does not seem to be hitting the mark, and it should be re-evaluated. Ailor said it would be helpful to have a fresh set of eyes look at the scoring. Guillory said the type of company can skew the data and scoring, and Louisiana develops its own indexes for scoring.

LeDuc said the conversation will be continued after everyone has a chance to review the summary.

5. Discussed the Lunch-and-Learn Webinar Scheduled for May 6

LeDuc said the Working Group's next lunch-and-learn session will be May 6. She thanked Utah and North Carolina for volunteering to share their processes for downloading, adapting, and organizing the MAPT data in their own tools in order to conduct their baseline analyses.

6. Received an Update on the Current MCAS Reporting

Randy Helder (NAIC) said with one day left before the MCAS due date for all lines of business except health insurance, other health insurance, and short-term, limited-duration insurance (STLDI), nearly 50% of all expected filings have been received. He said another 45% or more of the filings are expected to be filed on the last day. He advised that the jurisdictions will likely experience many more extension and waiver requests in the next day. Helder noted that Ratio 4 and Ratio 5 will not be posted this year for the other health filing. He said the numerous data elements in each add complexity to calculating them. He also suggested that the Working Group take another look at these since they seem to only provide an average of an average.

Having no further business, the Market Analysis Procedures (D) Working Group adjourned.

Sharepoint/Member Meetings/D CMTE/2024 Summer National Meeting/MAPWG/0429/04-MAPWG.docx

# MAP Interviews: MAPT

---

## Contents

Overview .....	2
Use of MAPT In Baseline Analysis .....	2
Use of the MAPT .....	3
Lines of Business .....	3
Frequency & Timing .....	3
Report Output Criterion .....	4
Approaches in Using MAPT .....	5
Going Beyond the MAPT .....	7
Internal Departmental Data .....	7
NAIC Data .....	8
External Data .....	8
Areas for Improvement .....	8
Expanding the Tool .....	8
Refining the Existing Tool .....	9
Improving Ease of Use .....	10
Enhancing the Tool .....	10
Training & Resources .....	10
Standard MAPT Interview Questions .....	12
MAPT Interview Question Responses .....	14
Do you use MAPT for baseline analysis? .....	14
Do you use the MAPT for all available lines of business? .....	14
Which lines are not used? .....	14
How often do you run the MAPT? .....	14
What Premium report criteria do you select? .....	14
What Level of Detail do you select for the report? .....	15
Describe how you use MAPT in baseline analysis .....	15
Does your basic approach to analysis of the MAPT vary by line of business? .....	15
Do you alter the weights/scoring of MAPT as part of your analysis? .....	15
Are there any fields in the MAPT you do not use? .....	15
Do you consider any additional information as a part of your baseline analysis? .....	16
Do you have suggestions on how to improve MAPT? .....	16

# MAP Interviews: MAPT

---

## Overview

In the summer of 2023, the Market Analysis Procedures (D) Working Group (MAP) invited all jurisdictions to participate in a survey regarding their usage of the Market Analysis Prioritization Tool (MAPT) for baseline analysis. A series of questions were developed and made available to all jurisdictions prior to commencing the interviews. The purpose of the questions was to facilitate the discussion and to provide jurisdictions an opportunity to prepare in advance of the interview. A copy of the questions is attached for reference.

Over a period of several weeks in October and November 2023, interviews were conducted by the MAP chair and NAIC staff with 26 jurisdictions. The following is a high-level overview of the interviews, including suggestions on how to improve MAPT and the market analysis process.

During the interviews, it became apparent that many jurisdictions refer to the MAPT (also known as the Market & Financial MAPT) and the Market Conduct Annual Statement-MAPT (MCAS-MAPT) interchangeably. In fact, 20 jurisdictions said they use both MAPTs in their baseline analysis. Whereas only one jurisdiction said it uses the two tools separately. The result of this interchangeability was that responses below sometimes apply more to the MCAS-MAPT than to the MAPT.

## Use of MAPT In Baseline Analysis

All 26 jurisdictions surveyed reporting conducting baseline analysis. The frequency and scope of the baseline analysis varied amongst the jurisdictions; with the level of activity ranging from conducting routine analysis on a regularly scheduled basis to conducting it as resources permitted.

Twenty-one (21) of the 26 jurisdictions reported using the MAPT as a part of their baseline analysis process. Two (2) of the 21 jurisdictions reported using only Market Conduct Annual Statement (MCAS) data (and related NAIC tools) in their baseline analysis process. The remaining three (3) jurisdictions reported that they did not use the MAPT tool as a part of their analysis process.

Of those three (3) that did not use the MAPT, one (1) indicated that they used an internal database system that pulls in much of the same information contained in the MAPT using a backend connection to the NAIC systems. In addition, the database pulls additional information from internal department systems such as the complaint system. The other two (2) jurisdictions cited the following barriers impeding their use of the tool:

- System roles issues, that were only recently discovered, preventing access to the tool.
- Lack of formal procedures within the department to have a clear understanding on how MAPT fits into the overall process.
- Lack of understanding and available documentation/training explaining how to use the tool and how to better interpret the data.

# MAP Interviews: MAPT

---

## Use of the MAPT

### Lines of Business

There are currently 13 lines of business available in MAPT. These lines of business are:

- Credit
- Group Accident & Health
- Group Annuity
- Group Life
- Group Major Medical
- Homeowners
- Individual Accident & Health
- Individual Annuity
- Individual Life
- Individual Major Medical
- Long Term Care
- Medicare Supplement
- Private Passenger Auto

Ten (10) of the jurisdictions indicated that they use all 13 lines available in MAPT. Most indicated that they may not run the smaller lines of business every year but that they do use them on a periodic basis. It was also noted by several jurisdictions that while they run all the lines every year, not every line of business receives the same level of scrutiny as more emphasis is placed on the mainstream lines of business. Furthermore, several jurisdictions noted that more attention is given to those lines of business for which MCAS data is collected.

The remaining jurisdictions indicated that they do not use all the lines of business available. In addition, one (1) jurisdiction indicated that it has plans to expand its analysis to include all the lines of business available.

Of the 13 lines of business available, only Individual Annuity and Individual Life were being used by all jurisdictions.

The most frequently noted line of business not used was Credit; however, only three (3) jurisdictions specifically mentioned that line of business. Each of the remaining lines of business were only specifically mentioned by a single jurisdiction.

Reasons noted for not using a particular line of business include department resource limitations (i.e., capacity concerns), the size of that market, lack of complaints, the data not being granular enough, or not conducting baseline analysis on that line of business due to periodic statutory examination requirements.

### Frequency & Timing

Most jurisdictions (16 of 21) indicated that they run MAPT reports annually as a part of their baseline analysis process. Many indicated that the time of the year when they run it may vary, however they generally wait until after the MCAS data is available and the verification period has ended. It was also noted by one jurisdiction that as more MCAS lines of business are being added, they are finding it necessary to wait until later to run the MAPT reports.

Two (2) jurisdictions indicated that they run the reports two times a year. For one (1) of these jurisdictions, they run the MAPT the first time to produce a preliminary view of the market. They then wait until after the MCAS data becomes available to run it again and begin baseline analysis.

# MAP Interviews: MAPT

---

The three (3) remaining jurisdictions indicated they run them as needed and when resources permit.

Several jurisdictions also noted that they may run a MAPT report on an ad-hoc basis as a method of quickly gather data about their market for purposes other than conducting baseline analysis. One (1) jurisdiction noted that they also occasionally run a new MAPT report if a company of interest has submitted revised financial statements.

## Report Output Criterion

### *Premium Threshold*

When running a MAPT report, users have four (4) premium level threshold options to choose from in running the report. The four (4) levels of data are:

- All Companies with Jurisdiction Premiums
- Companies with National Premiums over \$100,000
- Companies with Jurisdiction Premiums over \$100,000
- Companies with Jurisdiction Premiums over \$50,000

Eight (8) jurisdictions reported that they usually select the 'All Companies with Jurisdiction Premiums' option. Many indicated that they select this option because they want to have data for all companies doing business in their jurisdiction; however, they will often apply a premium threshold when conducting analysis. The internal thresholds varied from jurisdiction to jurisdiction and by line of business. One (1) larger jurisdiction advised that due to the size of their market, they use a premium threshold as high as \$10 million dollars for some lines of business. On the opposite end of the spectrum, smaller jurisdictions noted that because their market is so small they do not apply a premium threshold as a part of their analysis process.

Four (4) jurisdictions indicated that they select the 'Companies with Jurisdiction Premiums over \$100,000' option when running a MAPT report. Jurisdictions using this option indicated that experience has shown them that the ratio results are often skewed when companies with lower premiums are included. Therefore, they exclude the smaller companies from the analysis process.

Nine (9) jurisdictions indicated they select the 'Companies with Jurisdiction Premiums over \$50,000' option. The most common reason cited for selecting this threshold was that it matches the reporting threshold for most MCAS lines of business, and they want the MAPT and MCAS data sets to match.

None of the jurisdictions interviewed used the 'Companies with National Premiums over \$100,000' threshold when running the report.

One (1) jurisdiction indicated that the premium threshold option they select when running the report varies depending on the line of business under review. Several other jurisdictions also indicated that they recently changed or are currently considering their premium threshold.

### *Level of Detail*

When running a MAPT report, users must select one (1) of five (5) levels of data to be included in the report. The five (5) levels of data are:

# MAP Interviews: MAPT

---

- Only Main Component Scores
- Main Component and Sub-Component Scores
- All Scores and National Detail
- All Scores and State Detail
- All Scores and Detail

Most jurisdictions (18 out of 21) indicated that they selected the most detailed level of output, 'All Scores and Detail'. Of the remaining three (3) jurisdictions, one (1) runs the report using the 'Only Main Component Scores'; one (1) the 'Main Component and Sub-Component Scores'; and one (1) the 'All Scores and State Detail'. None of the jurisdictions interviewed select the 'All Scores and National Detail' level of data output.

## Approaches in Using MAPT

### *Approach by Line of Business*

Fourteen (14) of the jurisdictions interviewed indicated that their basic approach for using the MAPT data does not vary based on the line of business reviewed. Five (5) jurisdictions indicated that their basic approach to using the tool does vary by line of business. However, they indicated that the variance in approach was primarily due to the difference in the underlying data that is available for each line of business, especially those lines with corresponding MCAS data. One jurisdiction also noted that they will vary their approach to the baseline analysis based on the areas of concern for a specific line of business.

### *Data Elements*

Most of the jurisdictions interviewed indicated that they do not consider every data element included in a MAPT report; rather their analysis typically focuses on a subset of the data elements. However, one (1) jurisdiction indicated that they do use all the data presented to some extent, but the emphasis placed on a data element or category of data will vary depending on the line of business and potential areas of concern specific to the line of business being reviewed.

Eighteen (18) of the jurisdictions indicated that they include the national level data in the report when they generate a MAPT report. A few of the jurisdictions indicated that they do not routinely consider the national level data as a part of their analysis process. However, it is easier to include the data when running the MAPT report just in case something comes up and they want to review the information later. The balance of the jurisdictions indicated that they do consider the national level data in their analysis process; however, most of them place greater emphasis on the jurisdiction's data or only consider the national data where corresponding jurisdictional data is not available.

One (1) jurisdiction noted that, due a statutory requirement to periodically examine companies doing business in that jurisdiction, they focus specifically on the national data in support of the national analysis process.

The most frequently mentioned fields/categories of data noted as being used in analysis were:

- Complaints
- MCAS
- Premium
- RIRS



# MAP Interviews: MAPT

---

The most frequently mentioned fields/categories that were not used in analysis were:

- Demographics
- Examinations
- Market Share
- National Premium
- RIRS

## *MAPT Generated Scores*

Eleven (11) jurisdictions stated that they do not alter the weights/scoring provided by the MAPT reports. One (1) of these 11 jurisdictions indicated that they used to use the MAPT data to feed into an internal database; however, due to resource constraints they are no longer able to support that scoring mechanism.

Five (5) jurisdictions indicated that they alter the weights/scoring provided in the MAPT report. Three (3) of them put more weight on complaints, one (1) puts additional emphasis on its jurisdiction's scores, and one (1) creates its own scores within the output for each category in MAPT.

Five (5) of the jurisdictions noted they develop their own scoring mechanism and add additional fields (standard deviation, averages, etc.) to identify companies of interest. The MAPT reports are used by these jurisdictions to feed the data into their systems and not as a tool to conduct the analysis.

One (1) jurisdiction indicated that they generally look at just the national score and will only review the underlying data if something unusual is noted in the rankings.

While many jurisdictions indicated that they do not alter the weights/scores included in the MAPT reports, it should be noted that many of the jurisdictions are not actually relying on the built-in scoring mechanism to identify companies of interest. There was no single reason why jurisdictions were not using the built-in ranking mechanism, however, the following reasons were cited:

- Lack of understanding of how the rankings were being determined and/or their purpose.
- Prefer to review the associated raw data as it provides more detail.
- Trained to manually identify companies of interest using a different methodology.

## *Identifying Companies of Interest*

All the jurisdictions interviewed indicated that when conducting baseline analysis, their goal is to identify companies that they feel need additional analysis based on the baseline review. However, most jurisdictions reported that they do not use or rely solely on the MAPT-generated scores for identifying companies in their baseline analysis process. Rather the emphasis is placed on reviewing the underlying data to identify companies of interest.

Almost universally, the analysis of the MAPT data is done by line of business. However, several jurisdictions noted that they combine the results of certain lines of business (such as homeowners and automobile or individual life and individual annuities) before they make a final decision on which companies should proceed to the next steps in the process. The jurisdictions noted that there is often significant crossover between these lines of business and companies that appear on multiple lists as companies of interest are given a higher priority for additional review.

# MAP Interviews: MAPT

---

Individual processes of selecting companies for additional review varied amongst the jurisdictions. Several jurisdictions utilize the process like the one demonstrated in the training tutorial posted in iSite+ or as presented at training sessions at the NAIC Summit. While there are several variations used, the basics of the leading methodology used to identify companies are very similar.

Generally, a jurisdiction will break the MAPT into categories and look individually at individual MAPT data elements (or groups of data elements) to identify companies where the data appears to indicate the need for additional review. Each company that the analyst determines requires additional scrutiny is either flagged or assigned points. The process continues until all areas deemed important to the jurisdiction have been reviewed. The number of flags or points across each area are then summed to produce an overall score for each company. Jurisdictions then use this single list of companies to determine which companies will move on to the next phase of the process.

The methods used to determine which companies get flagged also varied amongst the jurisdictions. Below is a list of the most common ways a jurisdiction may view the data when determining if additional review is warranted:

- Changes in the individual data elements over time and/or as compared to the rest of the market.
- Current and prior year rankings.
- Information from external data sources (e.g., consumer complaints).
- Trend in an underlying data element compared to trend in a related data element.
- Data element comparison to other companies in the market or to a set benchmark.

It should also be noted that some jurisdictions place more emphasis on certain areas, such as consumer complaints, by assigning a higher point value to companies of interest.

Finally, one (1) jurisdiction noted that their process involves multiple analysts reviewing the data and independently identifying companies of interest. The individual results are then compiled and a single list of companies of interest is developed.

## Going Beyond the MAPT

Twenty (20) jurisdictions indicated that they considered one or more additional types of information in their analysis. The additional types of information considered fell into one of three broad sources: 1) internal departmental data, 2) additional information from NAIC systems, or 3) external sources.

### Internal Departmental Data

Internal departmental data sources were the most common additional source of information used to augment the MAPT. Consumer complaints were cited as the most frequent internal source of additional information. It should be noted that the level of detail reviewed by jurisdictions for complaints varied greatly. Some jurisdictions utilize the internal complaint data in their analysis, while others review and consider the actual complaints files.

# MAP Interviews: MAPT

---

Jurisdictions also mentioned using information from investigations and/or examinations, various jurisdictional filings, re-occurring data calls/surveys, referral information from management, recent legislative changes, information about companies identified via prior analysis for additional review, and data about frequency of late filings or multiple extension requests.

## NAIC Data

The second most common additional source of information used by jurisdictions came from NAIC systems. Market Conduct Annual Statement (MCAS) data was the most cited source of NAIC data used to augment the analysis. In fact, many jurisdictions noted that they wait until the MCAS data is available before running a MAPT. They then combine the MCAS-MAPT data and MAPT data and use it to identify companies of interest. One (1) jurisdiction also noted that they are now incorporating data about late MCAS filers and repeat extension requestors into their analysis.

Other sources of additional NAIC information included data from the Market Analysis Review System (MARS), Market Analysis Market Share (MAMS) reports, the Market Actions Tracking System (MATS), the Regulatory Information Retrieval System (RIRS), Financial Annual Statement, and Market Analysis Profile reports.

## External Data

Finally, several jurisdictions indicated that they consider additional information stemming from external sources, such as social media, news articles, company websites, and the Better Business Bureau. The process of considering these types of additional information is very time consuming and it was noted that it was usually done for companies that had risen to the top based on other indicators.

## Areas for Improvement

### Expanding the Tool

Fifteen (15) of the jurisdictions indicated that they would like to have the same lines of business available across the NAIC suite of market analysis tools (i.e., MAPT, MCAS, and MARS). Expanding the suite of tools would allow for process consistency and a more detailed review of all lines of business.

In addition, several jurisdictions were interested in MAPT reports that address specific lines of business, including:

- Commercial P&C Lines
- Dental Insurance
- Disability
- Pet Insurance
- Worker's Compensation

Several jurisdictions also suggested that the health lines of business should be more granular. For example, it was suggested that a more detailed breakdown of the types of products (i.e., commercial, Medicare Supplement, Dental, Short-term Limited Duration, Medicaid, self-insured, metal levels, etc.) be done. It was also suggested that information on prior authorizations and quality of care be incorporated into the tool.

# MAP Interviews: MAPT

---

Ten (10) jurisdictions indicated that they would like to have a single MAPT type tool that combined the data presented in the current MAPT report and the MCAS data into a single report. However, it should be noted that one (1) jurisdiction surveyed does not participate in MCAS and another one (1) does not collect every MCAS lines of business. As such, any combined tool would need to take these types of situations into account.

Many jurisdictions expressed interest in incorporating additional data into the baseline analysis process. Suggested additional data to incorporate into the MAPT reports included:

- Product filing data (rate, rule, and form) from SERFF.
- MARS system data, including information about past reviews and recommended next steps for those reviews.
- Market Actions Tracking System (MATS) data beyond the examination data currently used.
- Jurisdiction specific complaint data from SBS including the use of the SBS keyword.
- MCAS data points not currently considered such as extension requests and re-filing history.
- Other data collected by the jurisdiction via standing data calls/surveys.
- Information on third party administrators used by companies.
- External data sources such as social media data, news articles, company websites, and the Better Business Bureau.

## Refining the Existing Tool

There were also several suggestions for smaller improvements that could be made to the tool. Suggested refinements to the MAPT reports included:

- Make better use of the underlying codes used for categorizing complaints. One example was to incorporate complaint reason codes into the tool. Currently MAPT uses total complaint counts and does not differentiate or allow for the identification of trends based on the reason for the complaint.
- Provide the line of business information for regulatory actions and/or only include those actions specific to the line of business being reviewed. Currently MAPT includes all RIRS actions regardless of the line of business.
- Provide the line of business information for market conduct examinations and/or only include those examinations specific to the line of business being reviewed. Currently MAPT includes all examinations regardless of the line of business.
- Update the indicator for 'Nationally Significant' to align with the MAWG definition used for national analysis.
- Provide the ability to run the tool on a group basis, rather than just at the company specific level.
- Add additional information from MATS. Currently MAPT includes information only on examinations. It does not include information on other non-examination initiatives.
- Provide information that would allow for the identification of companies that may be flagged by our financial counterparts.

# MAP Interviews: MAPT

---

## Improving Ease of Use

Many jurisdictions commented on the labor-intensive nature of working with the MAPT data as presented. The current process is very time consuming as the jurisdictions spend significant amounts of time manually sorting the data, locating the data fields of interest, hiding data fields they are not using, and manually building other spreadsheets to identify companies of interest. Several jurisdictions indicated that it would be very helpful if a more automated process could be developed so that they could spend less time getting the data in a more useable format and spend more time analyzing it. Suggestions to help reduce the resources needed to review the MAPT included:

- Developing a cursory report that is automatically made available when the MAPT is run.
- Adding visualizations to allow for easier identification of areas of concern.
- Automating the sorting/selection of companies of interest.
- Allowing users to select the data elements to be included in the output.
- Providing more flexibility to jurisdictions on how the priority/rankings are determined when producing the MAPT report.
- Providing a way to highlight subcomponents that may be problematic.
- Providing a method for highlighting potential issues underlying data elements that may not show up in the ratios/rankings.

## Enhancing the Tool

In addition to suggestions for basic improvements to the MAPT, several jurisdictions also provided specific suggestions for taking it to the next level. The suggestions included:

- Eliminating the period (or reducing the amount of time) that MCAS-MAPT is down in the first part of each year.
- Revising the prioritization/ranking system to rely more on standardized statistical techniques considering items such mean, median, standard deviation, etc.
- Creating a system of analysis that can be run on a more frequent basis that considers information from the quarterly financial annual statements.
- Normalize data to reduce distortion that can be introduced because the data contains a large array of company sizes/types.
- Group into cohorts of like companies to ensure an apples-to-apples comparison of companies and to prevent masking potential companies of concern.
- Add information on statewide benchmarks to provide context in terms of how a single company compares to the rest of the market.
- Incorporate text analytics on for items such RIRS actions, complaints, and examinations so that the actual content of the item is considered in the prioritization, not just the existence of the item.
- Incorporate sentiment analysis of external data sources such as social media and news articles.

## Training & Resources

There were also several suggestions regarding additional training and resources that could be made available to the jurisdictions. The need for additional training and resources generally stemmed from recent staff turnover resulting in less experienced staff taking over the process which is compounded by

## MAP Interviews: MAPT

---

the need for staff to re-learn the process each time due to the amount of time in between cycles. Suggestions included:

- Simple reference guides that include helpful tips that contain information such as reasons why data across sources may not match up, reminding what time periods are used to pull the data, what criteria are used to pull the data, and explanations as to why some data may be missing for one or more companies.
- More detailed reference guides providing information explaining the background, the underlying data, the individual data sources, how the ranking is determined and how to work with the data.
- Smaller focused video snippets addressing very specific topics so that analysts can quickly refresh their memory on a specific item rather than having to go through an entire training video.
- Continued informal trainings such as the Lunch & Learns started last year by the MAP Working Group.
- Additional ways to connect with and learn from other jurisdictions (e.g., specific sessions at quarterly zone meetings).
- Increasing the communication to the jurisdictions when any changes to the data elements and/or the format of the output are being made so that jurisdictions have ample advance notice to adjust their internal processes.

# MAP Interviews: MAPT

## Standard MAPT Interview Questions

<b>Do you use MAPT for baseline Analysis?</b>	<b>→No→</b>	<b>Why not?</b>
↓ Yes ↓		↓ <b>How do you conduct baseline analysis?</b>

<b>Do you use the MAPT for all available lines of business?</b>	<b>→No→</b>	<b>Which lines are not used and why?</b>
↓ Yes ↓		<input type="checkbox"/> Credit (CR) <input type="checkbox"/> Group Accident & Health (GAH) <input type="checkbox"/> Group Annuity (GA) <input type="checkbox"/> Group Life (GL) <input type="checkbox"/> Group Major Medical (GMM) <input type="checkbox"/> Homeowners (HO) <input type="checkbox"/> Individual Accident & Health (IAH) <input type="checkbox"/> Individual Annuity (IA) <input type="checkbox"/> Individual Life (IL) <input type="checkbox"/> Individual Major Medical (IMM) <input type="checkbox"/> Long Term Care (LTC) <input type="checkbox"/> Medicare Supplement (MS) <input type="checkbox"/> Private Passenger Auto (PPA) ↓

<b>How often do you run the MAPT?</b>
↓

<b>What Premium report criteria do you select?</b>
Premiums: <input type="checkbox"/> All Companies with Jurisdiction Premiums <input type="checkbox"/> Companies with National Premiums over \$100,000 <input type="checkbox"/> Companies with Jurisdiction Premiums over \$100,000 <input type="checkbox"/> Companies with Jurisdiction Premiums over \$50,000 ↓

<b>What Level of Detail do you select for the report?</b>
Level of Detail for report: <input type="checkbox"/> Only Main Component Scores <input type="checkbox"/> Main Component and Sub-Component Scores <input type="checkbox"/> All scores and National detail <input type="checkbox"/> All scores and Jurisdiction detail <input type="checkbox"/> All scores and detail -- may exceed 256 columns ↓

# MAP Interviews: MAPT

<b>Describe how you use MAPT in baseline analysis</b>		
↓		
<b>Does your basic approach to analysis of the MAPT vary by line of business?</b>	<b>→Yes→</b>	<b>Describe how it varies, for which lines, and why.</b>
↓ No ↓		↓
<b>Do you alter the weights/scoring of MAPT as a part of your analysis?</b>	<b>→Yes→</b>	<b>How do you alter it and why?</b>
↓ No ↓		↓
<b>Are there any fields in the MAPT you do not use?</b>	<b>→Yes→</b>	<b>Which fields are not used and why?</b>
↓ No ↓		↓
<b>Do you consider any additional information as a part of your baseline analysis?</b>	<b>→Yes→</b>	<b>What additional information do you consider?</b>
↓ No ↓		↓
<b>Are there any additional lines of business for which you would like to have a MAPT?</b>		
↓		
<b>Do you have any suggestions on how to improve the MAPT?</b>		



# MAP Interviews: MAPT

---

## MAPT Interview Question Responses

A total of 26 jurisdictions participated. Some questions may have multiple responses per jurisdiction based on the line of business being reviewed.

### Do you use MAPT for baseline analysis?

21	Yes
2	Use only MCAS data or MCAS-MAPT and NAIC Tableau Dashboards
3	No

### Do you use the MAPT for all available lines of business?

10	Yes
1	Has plans to expand analysis to all lines of business.
9	No

### Which lines are not used?

3	Credit
1	Group Accident & Health
1	Group Annuity
1	Group Life
1	Group Major Medical
1	Homeowners
1	Individual Accident & Health
1	Individual Major Medical
1	Long Term Care
1	Medicare Supplement
1	Private Passenger Auto

### How often do you run the MAPT?

16	Annually
2	Semi-annually
3	As Needed/When Resources Permit

### What Premium report criteria do you select?

8	All Companies with Jurisdiction Premiums
-	Companies with National Premiums over \$100,000
4	Companies with Jurisdiction Premiums over \$100,000
9	Companies with Jurisdiction Premiums over \$50,000

One (1) jurisdiction indicated that they use a premium threshold of \$1 million dollars due to the size of their market. Another jurisdiction indicated that their premium threshold varies depending on the line of business under review.

# MAP Interviews: MAPT

## What Level of Detail do you select for the report?

1	Only Main Component Scores
1	Main Component and Sub-Component Scores
-	All scores and National detail
1	All scores and Jurisdiction detail
18	All scores and detail -- may exceed 256 columns

## Describe how you use MAPT in baseline analysis.

9	Divide MAPT into its categories and concentrate on doing a baseline analysis per category.
5	Have developed their own tools which import MAPT and other data.
3	Run MAPT and incorporate the companies that were isolated during the prior year.
2	Rely on the process in the iSite+ tutorials in conducting their analysis.
2	Use MAPT only for gathering information on individual companies.
7	Stated they have a jurisdictional focus in conducting the analysis
1	Stated they have a national focus in its analysis

Of the jurisdictions that indicated they divide the MAPT into categories to conduct their analysis, many stated that while they download all the data, their analysis typically focuses on a subset of the data elements included in the MAPT. The most mentioned data fields/categories noted as being **used in analysis** were:

6	Complaints data
4	Premium data
3	RIRS data
2	MCAS data
1	Market Share data

## Does your basic approach to analysis of the MAPT vary by line of business?

14	No
5	Yes

## Do you alter the weights/scoring of MAPT as part of your analysis?

11	No
5	Yes

## Are there any fields in the MAPT you do not use?

3	National data
2	Demographics data
2	RIRS data because it is not line specific
1	Premium data
1	Market Share data
1	Complaint Indices because the underlying data is preferred

## MAP Interviews: MAPT

### Do you consider any additional information as a part of your baseline analysis?

Twenty (20) jurisdictions considered one or more additional types of information in their analysis.

13	Internal Complaints
9	MCAS
5	Company Issues in the Jurisdiction/Trending Consumer Issues
4	MARS Level 1 and Other Market Analysis Data
3	Jurisdiction Examination Information
2	Market Analysis Market Share (MAMS)
2	Jurisdiction Filings
1	Late filings or multiple extension requests
1	Continuum actions
1	Referral from management
1	Financial Annual Statement data
1	Market Analysis Profile
1	Social media
1	Companies identified in the prior year
1	Market Actions Tracking System (MATS)
1	RIRS
1	News articles

### Do you have suggestions on how to improve MAPT?

15	Have the same lines of business available in MAPT, MARS and MCAS
10	Combine MAPT and the MCAS-MAPT
6	Continue jurisdiction interactions (e.g., lunch and learns)
3	Incorporate SERFF data
3	Incorporate text analytics (RIRS, complaints, exams)
2	Improve the ease of use
2	Automate the sorting
2	Add more content on complaints and exams
2	Add visualization
2	Provide the ability to use the tool on a group basis
2	Breakout health into more specific product types
2	Include the information on MARS 1 & 2 reviews by LOB
1	Update nationally significant indicator
1	Add P&C commercial lines
1	Link to MARS
1	Sometimes data is missing
1	TPA database
1	Provide LOB info for regulatory actions and market conduct exams
1	Prior authorization data and separate compilation by metal level and coverage
1	Break out disability insurance
1	Better notification of changes to any data element in MAPT
1	Have a synopsis MAPT with fewer columns
1	Make data more real time in MCAS-MAPT

## MAP Interviews: MAPT

---

1	Put together regulator group for any overhauls to MAPT
1	More flexibility to customize how the priority is determined
1	Bucket companies into like grouping to prevent masking of potential companies of concern
1	Incorporate social media data, news media data and data from other outside sources