



State of Rhode Island
DEPARTMENT OF BUSINESS REGULATION
1511 Pontiac Avenue, Bldg. 69-2
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Insurance Division

April 26, 2021

Greg Welker
gwelker@naic.org
NAIC Producer Licensing Working Group

Dear Greg:

Please accept this as comment on the Producer Licensing Uniformity (D) Working Group's proposal to provide a uniform solution to the licensing for Pet Insurance. The three proposals are as follows:

- A. Confirm current Uniform Licensing Standards for Pet Insurance is correct policy direction. Or
- B. Recommend Pet Insurance become a core limited line all states shall adopt. Or
- C. Recommend the major lines of authority of Property and Casualty be required to sell Pet Insurance.

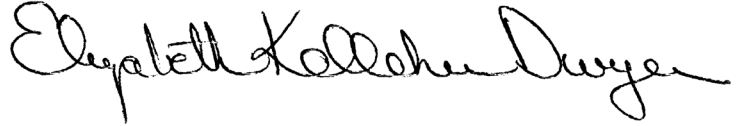
Since we do not want a licensing decision to have an effect on the market for pet insurance we conducted research on three of the states that currently issue pet limited line licenses. Although not required by the state, none of the three states have any producer that is licensed only to sell pet insurance. All persons who hold the pet limited line are also licensed to sell a major line of authority.

We would like to suggest a fourth alternative. Pet insurance is considered a Property and Casualty line for financial reporting purposes. However, nothing about the manner in which the product works resembles any other type of Property and Casualty product. The test for Property and Casualty will not test pet insurance producers on issues they will encounter other than general concepts of insurance and the ethical responsibilities of producers. We would suggest, therefore, that the third recommendation be amended to require a full license with any major line of authority. A licensed individual may then add the pet limited line to sell pet insurance. This would allow a producer that only sells pet insurance to choose a major line of authority that they believe will assist in their profession (possibly health) and assure that they are aware of the general duties owed by a producer.

This construct is not without precedent. The NAIC Model [Travel Insurance Act # 632](#) section 4D provides: "Any person licensed in a major line of authority as an insurance producer is authorized to sell, solicit and negotiate travel insurance. A property and casualty insurance producer is not required to become appointed by an insurer in order to sell, solicit, or negotiate travel insurance."

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in black ink, reading "Elizabeth Kelleher Dwyer". The signature is written in a cursive style with a large, stylized initial "E".

Elizabeth Kelleher Dwyer
Superintendent of Financial Services



April 23, 2021

Greg Welker, CFE
Antifraud and Producer Licensing Program Manager
Market Regulation Department
National Association of Insurance Commissioners
1110 Walnut Street, Suite 1500
Kansas City, Missouri 64106

Via email to gwelker@naic.org

Dear Mr. Welker:

On behalf of the American Veterinary Medical Association (AVMA) and our member veterinarians, we thank you for the opportunity to provide input to the Producer Licensing Uniformity (D) Working Group (Working Group) regarding recommendations for current Pet Insurance Licensing Standards. Our intent in submitting our comments is to provide the Working Group with the veterinarian's perspective and the appropriate role of the entire veterinary healthcare team with respect to pet insurance. The AVMA appreciates your efforts to gather stakeholder input when considering appropriate regulatory standards for the pet insurance industry.

The AVMA is the nation's leading representative of the veterinary profession and speaks for more than 97,000 member-veterinarians across the United States who care passionately about protecting animal health, animal welfare, and human health. Informed by our members' unique scientific knowledge, training, and practical experience, we advocate for policies that support our patients and their owners, advance the practice of veterinary medicine, and promote the critical work of veterinarians nationwide.

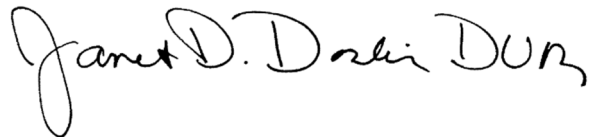
As veterinary medicine becomes more technologically advanced, our ability to provide increasingly sophisticated care for our animal patients also advances. But more sophisticated care can incur additional cost for the equipment, facilities, and training needed to deliver it. The AVMA recognizes that pet health insurance can assist by offsetting some or most of the cost of diagnosing, treating, and managing a pet's illnesses and injuries and, as such, we encourage veterinarians to proactively educate their clients about the existence and value of this resource. We fully recognize that a viable and appropriately regulated pet health insurance industry can provide valuable support as veterinarians continue to provide high quality veterinary services at an affordable cost for pet owners.

Fortunately, the veterinary profession continues to enjoy a high level of public trust. As a result, clients actively seek advice from veterinarians regarding care for their pets, including what financial options may be available to support them in following veterinary healthcare recommendations. As a result, veterinarians often share general information about pet health

insurance with their clients (e.g., its availability and the importance of asking appropriate questions of the insurance provider so the client can determine the right product for them), but they do not provide the level of information that would require producer licensing. In other words, the veterinarian's role is not one of offering, selling, soliciting, or negotiating pet health insurance products; instead, veterinarians will seek to provide interested clients with resources for locating licensed knowledgeable professionals in the insurance field.

Thank you again for the opportunity to provide feedback. The AVMA appreciates the Working Group's consideration of our thoughts and we look forward to continued collaboration with the National Association of Insurance Commissioners on the appropriate regulation of the pet insurance industry. If you have any questions or would like more information, please contact Dr. Gail Golab, Chief Veterinary Officer, at 847-285-6618 or via e-mail to ggolab@avma.org, or Mr. Isham Jones, General Counsel at (847) 285-6708 or via e-mail to ijones@avma.org.

Sincerely,

A handwritten signature in black ink that reads "Janet D. Donlin DVM, CAE". The signature is written in a cursive style with a large, looped initial "J".

Janet D. Donlin, DVM, CAE
Chief Executive Officer and Executive Vice President

JDD/GCG/IJ

NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

PRODUCER LICENSING UNIFORMITY (D) WORKING GROUP

Pet Insurance Licensing Standards – Discussion Document

APRIL 23, 2021

On behalf of National Association of Mutual Insurance Companies (NAMIC)¹ members, thank you for the opportunity to comment on the approaches under consideration for licensing pet insurance producers.

For those producers who do not already hold a full major lines producer license (property and casualty (P/C) or accident and health (A&H)), **NAMIC supports a core limited line approach which incorporates a mechanism for appropriately tailored education/testing.**

This approach provides flexibility for a variety of different producer approaches while still: protecting consumers, providing regulatory oversight, addressing reciprocity, and allowing uniform roll-out of the Pet Insurance Model Act. For these reasons, NAMIC members encourage this Working Group to move forward with the core limited line option.

* * * * *

Thank you again for the opportunity to share this perspective.

¹ NAMIC is the largest property/casualty insurance trade group, with a diverse membership of more than 1,400 local, region, and national member companies, including seven of the top 10 property/casualty insurers in the United States. NAMIC members lead the personal lines sector, representing 66% of the homeowner's insurance market and 53% of the auto market.

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April 23, 2021

Delivered via Electronic Mail – gwelker@naic.org

Producer Licensing Uniformity (D) Working Group Members
c/o Greg Welker
Antifraud & Producer Licensing Program Manager
Market Regulation Department
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
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RE: Request for Comments on Producer Licensing Standards for Pet Insurance

Chairman Murray & Members of the Working Group:

The North American Pet Health Insurance Association (“NAPHIA”) appreciates this opportunity to comment on producer licensing standards for pet insurance. The Working Group’s recommendation on the best policy option for pet insurance producer licensing will shape how these products are sold throughout the United States; this project is therefore of critical importance to NAPHIA members who collectively represent over 95% of the pet insurance market in North America.

For reasons discussed below, NAPHIA urges the Working Group to recommend that the NAIC designate pet insurance as a core limited line all states shall adopt in order to:

- Fully leverage the uniformity and clarity provided for this market by the Pet Insurance Model Act;
- Achieve a consistent level of consumer protection and oversight across states;
- Minimize unnecessary costs and barriers to entry for pet insurance producers (the vast majority of whom sell *only* pet insurance through websites or call centers) and allow this relatively new product line to grow; and
- Qualify as a reciprocal jurisdiction for licensing purposes.

In conjunction with a limited lines licensing structure, NAPHIA intends to implement a private training program for its members to promote robust pet insurance-specific education amongst the market's sales force.

I. NAPHIA Urges the Working Group to Recommend that Pet Insurance Become a Core Limited Line All States Shall Adopt.

- A. A core limited line for pet insurance is the best policy option because it will, along with the Pet Insurance Model Act, advance NAIC members' goal of uniform regulation of pet insurance for the benefit of consumers and oversight of this rapidly growing market.

Pursuant to the NAIC's Uniform Licensing Standards ("ULS"), all states shall adopt consistent definitions of core limited lines products and shall include the core lines among any limited lines permitted in the state.¹ The core limited lines are uniquely situated within the producer licensing structure because they do not require a full lines license, but they *do* merit uniform treatment by the states to ensure consistent consumer protections and to avoid stifling market growth with a patchwork of complex and varied regulatory requirements. NAPHIA contends that pet insurance fits squarely within the purpose of this core limited lines category.

Regulators' interest in, and commitment to, bringing greater clarity and uniformity to the pet insurance market for the benefit of consumers and all stakeholders is evinced by the Pet Insurance (C) Working Group's ongoing work on a Pet Insurance Model Act. Indeed, the request to develop the Pet Insurance Model Act affirms that "the subject matter necessitate[s] a national standard and require[s] uniformity amongst all states" and that NAIC members should devote significant resources to the endeavor.² The request further explains, "there is ambiguity within regulation of the pet insurance market and having a more defined and consistent regulatory structure will improve the market and benefit consumers."³ Accordingly, the Pet Insurance Working Group and other interested regulators have invested considerable effort crafting consistent definitions, consumer disclosures, and other requirements for pet insurance.

The same rationale underpinning the Pet Insurance Model Act should support similar uniformity in pet insurance licensing – a fundamental element of the regulatory system and major impetus behind development of the Pet Insurance Model Act.⁴ Classifying pet insurance

¹ See ULS Standard 33 ("A state shall have nine or fewer limited lines, which include the core limited lines.").

² *Request for NAIC Model Law Development – Pet Insurance (C) Working Group*, NAIC (July 18, 2019), available at https://content.naic.org/sites/default/files/inline-files/PetMLR_Final07182019.pdf.

³ *Id.*

⁴ The request for the Pet Insurance Model Act included producer licensing as a main component of the project. See *id.* ("This model would define a regulatory structure related to pet

as a *core* limited line that must be adopted by all states is an essential step toward achieving that standardization, including adoption of key definitions, which have been a big focus of the Pet Insurance Working Group and the Pet Insurance Model Act's contents.

Retaining the current ULS approach with pet insurance as a *non-core* limited line, on the other hand, opens up the market to 50-plus different licensure approaches and varying terminology, and is counterproductive to the mission behind the Pet Insurance Model Act and the substantial progress already made toward uniform regulation of pet products. The non-core limited lines category, comprised of over fifty lines of insurance and treated differently by every state, also presents licensing reciprocity challenges between jurisdictions. It would be incongruous for states to adopt the Pet Insurance Model Act with uniform terms, notices, product parameters, etc., but not share a common licensing path under which these products may be sold.

B. A limited lines license option is appropriate for producers who sell only pet insurance.

NAPHIA recognizes that, today, a majority of states require a full property or casualty license to sell pet insurance, despite the ULS's categorization of pet insurance as a limited line product. *Now* is the time to revise and guide states' approach, while the industry is relatively new and market penetration is low, and as the Pet Insurance Model Act nears completion. The industry is growing rapidly and consumer demand for pet insurance is rising,⁵ which makes it ripe for a regulatory structure that ensures consistent consumer protection (via uniform definitions, disclosures, and enforcement) and availability of coverage from an educated licensed sales force. The best way to grow and protect this market, we believe, is to provide a limited lines license option for producers who only sell pet insurance.

Currently, the vast majority of pet insurance policies are sold by licensed producers who sell only pet insurance (i.e., relatively few sell other lines of insurance). Roughly 70% of pet insurance sales are initiated online and 30% are initiated through call centers.⁶ While a

insurance, including issues such as *producer licensing*, policy terms, coverages, claims handling, premium taxes, disclosures, arbitration, and preexisting conditions.”) (emphasis supplied). The Pet Insurance Working Group referred the licensing issue to the Producer Licensing Task Force because of its jurisdiction and expertise, and notably, without any indication that the goals and motivations behind the Pet Insurance Model Act should not continue to apply to this work stream.

⁵ Total premiums for pet insurance exceeded \$1.3 billion in 2018 – more than double what they were in 2013 – and are expected to be over \$2 billion by 2022. Jill M. Bisco, Ph.D. and Stephen G. Fier, Ph.D., *Licensing and Reporting in the U.S. Pet Insurance Market*, 39 J. Ins. Regulation 1, 9 (2020), available at <https://content.naic.org/sites/default/files/inline-files/JIR-ZA-39-02-EL.pdf>.

⁶ *A Regulator's Guide to Pet Insurance*, NAIC at 7 (2019), available at https://naic.org/prod_serv/PIN-OP-19.pdf.

consumer may learn about the option of pet insurance from a different source (e.g., veterinary office, pet store, groomer, or shelter), *the actual sale of the pet insurance policy always takes place through a licensed pet insurance producer's website or call center.*⁷

Limited lines of insurance, unlike the major lines, cover only a specific subject matter and generally have fewer requirements and lower fees for licensure – essentially, they offer a more tailored and accessible licensure option for producers, like pet insurance producers, the overwhelming majority of whom limit their sales activity to one specific type of insurance. Requiring a major line license in these cases imposes unnecessary costs and barriers to entry for producers, which ultimately limits the potential growth of this market and product availability for consumers.

Limited lines insurance producers, under the ULS, should receive pre-licensing instruction or training, subject to approval by insurance regulators. NAPHIA fully supports robust, pet insurance-specific education for limited lines pet insurance producers – training that producers who hold P&C licenses do not receive. First and foremost, such training is essential for consumer protection. More generally, it will expand the pool of professionals knowledgeable about pet insurance products and able to effectively help consumers who are interested in purchasing this voluntary product. NAPHIA's proposal to help develop and lead an industry training program is discussed more fully in Section II below.

C. Producers holding a full property/casualty license also should be permitted to sell pet insurance.

In general, major lines producer licenses authorize those licensees to sell all lines of authority within that major line category (e.g., all property lines for a full property license, which would include pet insurance). NAPHIA does not propose or support carving pet insurance out of this general practice or the broader property/casualty (P/C) licenses.⁸ Some producers (albeit not many) do sell pet insurance, along with a number of other products, under a full P/C license and they should be permitted to continue doing so.⁹ NAPHIA simply maintains, for reasons

⁷ Indeed, an unlicensed veterinarian or pet shelter employee would not have the capability to sell an insurance policy because s/he would not have access to fulfillment materials, pricing, etc.

⁸ Producers holding accident or health licenses could utilize the limited line licensure path to sell pet insurance.

⁹ Although the P/C training and examination does not currently focus on pet insurance, full P/C producers do receive some product-specific instruction and oversight from pet insurance carriers. This carrier-supplied training should not, however, be the overall go-to solution for the pet insurance sales force. As noted above, most pet insurance producers *only* sell pet insurance, so forcing them to get a full P/C license and then undergo separate training by carriers is wasteful and overly costly for the industry, and does not ensure consistent and reliable training across companies. A far more efficient and consumer-protective approach is to allow the vast

enumerated above, that a full P/C license should not be *required* for producers who only sell pet insurance.

II. NAPHIA Will Develop and Promote a Robust Producer Training Program for Its Members.

As noted above, the ULS calls for pre-licensing training or education of limited lines producers. With other core limited lines like car rental, credit, and travel insurance, the training obligation generally falls on the licensed entity that employs or supervises the product sellers and the program of instruction is subject to regulator review and approval (including any updates or changes to the program).¹⁰ We believe this approach also makes sense for pet insurance limited lines licensees.¹¹ Moreover, NAPHIA, whose membership accounts for nearly all of the North American pet insurance market, is uniquely positioned to work with regulators to spearhead a consistent, substantive training program for limited lines licensees in the industry.

majority of pet insurance sellers to get a tailored limited lines license with tailored regulator-approved instruction.

¹⁰ *See, e.g.*, Cal. Ins. Code 1758.82(c) (“Training materials used by or on behalf of the rental car company to train its endorsees shall be submitted to the department at the time the rental car company applies for a license under this article, and whenever modified thereafter. Any changes to previously submitted training materials shall be submitted to the department with the changes highlighted 30 days prior to their use by the licensee. Training materials and changes to those materials submitted to the department pursuant to this subdivision shall be deemed approved for use by the company unless it is notified by the department to the contrary...”); SDCL 58-30-203 (“Each rental car agent shall provide a training and education program for each endorsee prior to allowing an endorsee to offer, sell, or solicit rental car insurance. The training and education program may be conducted at remote locations or through videotape or any means approved by the director in rules promulgated pursuant to chapter 1-26. The training and education program shall meet the following minimum standards:”); Neb. Rev. St. § 44-4067(10) (“Each limited licensee shall conduct a training program which shall meet the following minimum standards:”); 215 ILCS 5/500-100(a)(8) (“credit life and credit accident and health insurance and other credit insurance policies approved or permitted by the Director; a credit insurance company must conduct a training program in which an applicant shall receive basic instruction about the credit insurance products that he or she will be selling”); ULS Standard 34 (the Limited Lines Travel Insurance Standard places a training requirement on the licensed entity to provide a program of instruction or training to anyone whose duties include offering and disseminating travel insurance).

¹¹ The Working Group could recommend specific training parameters in the ULS for pet insurance as the NAIC did for travel insurance (explicitly requiring regulator review and stipulating minimum elements of the instructional program, including education on the types of products offered, ethical sales practices, and required consumer disclosures).

Pet insurance is not a focus of the major lines' license training or examination,¹² so a pet-specific program for pet-specific sellers would *increase* the level of product knowledge among individuals selling the lions' share of these products. In addition to training on pet insurance products, any limited line producer education program could *and should* include training on basic insurance principles, consumer protections, and unfair trade practices. Ultimately, NAPHIA envisions a limited lines pet insurance producer training program that shares the generally-applicable elements of a major P/C or accident/health license training, but does not cover the multitude of other products that will never be sold by these limited lines licensees.¹³

NAPHIA therefore intends to form an education committee and create a uniform private solution for training its members' pet insurance limited lines licensees, including testing for licensees who do not take a P/C or accident/health examination.¹⁴ Such training would be a requirement for NAPHIA membership. NAPHIA looks forward to working with other stakeholders and regulators to design and implement this industry-based solution.

* * *

We appreciate your consideration of NAPHIA's positions and recommendations, and we look forward to more discussion of these important issues with the Working Group.

Sincerely,



Kate Jensen
Counsel, North American Pet Health Insurance Association

¹² This is understandable given the number of lines and mandatory-purchase coverages that fall under the major property and casualty licenses and with which pet insurance, a new and voluntary product, must compete for training time and examination space.

¹³ NAPHIA supports regulators' involvement in, and approval of, limited lines training programs as an important consumer protection backstop to ensure that these programs are addressing areas of greatest importance to regulators and pet insurance consumers.

¹⁴ NAPHIA's proposed training program would focus on limited lines license holders because major P/C and accident/health licensees already undergo strict state-mandated examinations, along with training and continuing education requirements.



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April 22, 2021

Producer Licensing Uniformity (D) Working Group
c/o Greg Welker
Antifraud & Producer Licensing Program Manager
Market Regulation Department
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
Kansas City, MO 64106

Dear Chairman Murray and Members of the Working Group:

On behalf of Unum Group and its insuring subsidiaries (“Unum”), I write to provide comments to the Producer Licensing Uniformity (D) Working Group on the topic of Pet Insurance Licensing Standards. Unum appreciates this opportunity to comment.

Unum wishes to provide its perspective as an interested life, accident, and health (“A&H”) carrier. Unum is a leading provider of excepted benefit A&H products that are offered to employees through the worksite. Unum views pet insurance as a natural fit alongside its currently available products, since it aligns with our value proposition of providing consumers with financial protection when unforeseen events occur that affect themselves and their loved ones. Unum is seeing increased consumer demand for pet insurance, but is presently unable to meet this demand because pet insurance is classified in most states as property and casualty (“P&C”) insurance. Unum’s insuring subsidiaries are not P&C carriers and as such, most of our agents and sales representatives are not licensed to sell P&C insurance. This has made it difficult for companies like Unum even to pilot a pet insurance offering.

Estimates of the American pet insurance market suggest that despite strong growth of approximately 15-20% in recent years, still less than 2% of dogs and cats in America are covered by a pet insurance policy.¹ Considered against other markets – for example, the United Kingdom, where 25-30% of dogs and/or cat owners maintain pet insurance – there is clearly scope for significant expansion of coverage and protection.²

¹ National Association of Insurance Commissioners, *A Regulator’s Guide to Pet Insurance* (“NAIC White Paper”), at 2-3 (2019); North American Pet Health Insurance Association, *State of the Industry 2019*, at 1 (2019).

² See NAIC White Paper at 4.

The worksite is a predominant location for working Americans to purchase insurance benefits and a convenient setting to meet large scale consumer demand. Employers can play a pivotal role in providing benefits education to help employees make informed insurance choices. As you know, it is A&H carriers, not P&C carriers, that routinely distribute insurance at the worksite.

Given this background, **Unum strongly supports the recommendation to make pet insurance a core limited lines license.** This recommendation provides an avenue for A&H agents to sell pet insurance at the worksite that is both appropriate and reasonable.

Unum acknowledges why pet insurance has been considered P&C insurance: pets are considered property under the law, and pet owners, not pets, are the insureds and policyholders.³ At the same time, pet insurance functions in most respects like an A&H product. “The coverage options and policy details associated with pet insurance are like those found in human health insurance. . . Provisions for in-network providers, co-insurance or co-payment, exclusions for preexisting conditions, age limits and waiting periods are more like health insurance than P/C coverage.”⁴

Similarities between pet insurance and A&H insurance products include:

- **Plan Design:** Comprehensive pet insurance policies are similar to health plans in that they typically cover reasonable and necessary expenses that occur during the policy period for medical management, diagnosis, or treatment of a pet’s condition.
- **Policy Benefits:** Veterinary expenses or services include medical advice, diagnosis, care, or treatment provided by a veterinarian. Other services and medical expenses that may be covered include the costs of the visit, prescription drugs, food and supplements, medical equipment, surgical procedures, physical therapy, and dental procedures.
- **Premium Rating:** Pet insurance premium development is similar to health plans in that both typically use rate variables such as geographic area, deductibles, copays, limits, age, gender, and health history.
- **Additional Similarities:** Pet plans may include optional wellness and preventive coverage, copayments, deductibles, limitations, waiting periods, and policy exclusions.⁵

As a result, pet insurance is within the penumbra of an A&H agent’s existing expertise. A limited lines license acknowledges that pet insurance is appropriate for sale by these agents and may be well-placed alongside A&H products. Insurance carriers will continue to protect

³ See, e.g., NAIC White Paper at 10; Comments to the Working Group from Washington Office of Insurance Commissioner, Oct. 30, 2019.

⁴ NAIC White Paper at 10.

⁵ NAIC White Paper at 8-9, 17; North American Pet Health Insurance Association, *State of the Industry 2019*, at 5.

consumers by imposing standards and education on these agents just as they do for other products.

Additionally, Unum urges the Working Group to make pet insurance a core limited line. The current standard has not provided the uniformity and reciprocity needed for this market to grow. At the other extreme, requiring a full P&C major lines license is a restrictive and unnecessary burden that would reverse this product's growth potential. State practices vary, but obtaining a full P&C license typically entails many hours of study, taking an exam that contains virtually no questions relevant to pet insurance, incurring associated costs and fees, and maintaining the licensure year to year. This process unduly hinders already-knowledgeable agents from accessing the product and bringing it to consumers at the worksite.

Thank you for your consideration of this letter. We are available for further discussion, and look forward to hearing the Working Group's deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Glyn Williams", with a large, sweeping flourish at the end.

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Mr. Greg Welker and Mr. Chris Murray
Uniformity Working Group
Producer Licensing Taskforce
C/O NAIC
1100 Walnut Street
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Kansas City, MO 64106-2197

RE: Pet Insurance Licensing Standards

Dear Mr. Welker and Mr. Murray and members of the working group.

Please, let me thank you for this opportunity to provide the following information on behalf of our client, Companion Protect, which sells and underwrites pet health insurance.

We have worked with the drafting of the uniform standards for licensing specific to pet insurance and the Property and Casualty Insurance E Committee, Pet Insurance Working Group in their endeavors resulting in a Pet Insurance White Paper and the continued drafting of the Pet Insurance Model Act.

We appreciate your careful considerations in reviewing the issues for pet producer licensing and encourage in your evaluation of the affect the working group's actions may have on the ability to make pet insurance more readily available and more easily accessed by the consumers who have and care for pets.

In response to your request for comments, we would support work and efforts to recommend a core limited line for all states to adopt.

Part of the historical frustrations that consumers have had with pet insurance is that they have not understood the products that they have purchased. In the training, education and qualifications to become a general lines, property and casualty producer, there is no focus on pet health insurance. We feel that limited lines is a viable vehicle to train and supervise producers that only want to sell pet insurance. We feel that the limited lines approach will aid consumers in becoming aware of the availability of pet insurance at a time when they need it while adopting or acquiring their pets.

We look forward to working with you throughout this process.

With regards

Jack

John Chaskey, CIE, CPCU
Westmont Associates, Inc.

CC Companion Protect