Termination for Cause Form

Comments

Nov. 4, 2026

Regulator Comments

Maine (Tracy Cunningham)

Missouri (Brogan Dinolfo)

North Dakota (Suan Daou)

Ohio (Lindsey Jones)

Texas (Jodie Delgado)

West Virginia (Brittany Moles)

Industry Comments

ACLI (David Leifer/Colin Masterson)

APCIA (Michael Richmond-Crum)

NAMIC (Erica Weyhenmeyer)

Vertafore (Paula Sisneros)

Maine Comments – TFC 10.7.26

The Maine Bureau of Insurance would like to submit the following comments/inquiries in regards to the Company Notice of Termination for Cause Form:

1. This form looks good and would make the TFC follow up process a lot easier if implemented!

2. How many document upload fields will be included in this form? For example, under "Did the insurer conduct an investigation?" Will there be an option to upload a copy of the corresponding SIU report or under "Did the insurer file a fraud referral against the producer?" an option to upload a copy of the fraud referral, etc.).

3. The "Authorized Contact for Investigation Follow Up" field, says that "shared mailboxes are not acceptable." Most of the TFC's we receive provide a general inbox for follow up inquiries that is managed by multiple staff members (e.g., "doiinquiries@insurer.com", "producerlicensing@insurer.com", etc.). This requirement doesn't pose a problem on our end and we wonder how industry will respond to this requirement?

Thank you!

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Governor Mike Kehoe
State of Missouri

Missouri Department of
Commerce & Insurance
Angela L. Nelson, Director

Division of Insurance Company Regulation

October 28, 2026

Vicki Schmidt, Chair
Scott A. White, Vice Chair
Producer Licensing (D) Task Force

RE: Proposed Changes to the Company Notice of Termination for Cause Form

Chair Schmidt and Vice Chair White,

The Missouri Department of Commerce and Insurance ("Missouri DCI") supports the ongoing efforts to enhance producer licensing and termination processes. We appreciate the utility of the "Company Notice of Termination for Cause" form and write to recommend a minor addition to improve the effectiveness of regulatory reviews.

We propose a modification to the "Documents Attached" section of the form. Specifically, we recommend adding an option to attach an insurer's investigative report and any other relevant documentation when a termination for cause is related to an investigation. This change would be pursuant to state regulations, such as Missouri's 20 CSR 700-1.130 and section 375.022.8, RSMo, which require the provision of these documents and govern their confidentiality and sharing with regulatory bodies.

Currently, the form only includes a "Yes/No" drop down option for a company to attach the “Producer's termination letter.” While the form does ask, "Did the insurer conduct an investigation of this producer?", it does not provide a clear mechanism for the insurer to securely provide the resulting investigative report or any other relevant documentation at the time of notification.

Providing this functionality would allow regulators to receive a more complete picture of the circumstances leading to the termination for cause from the outset. This would streamline the review process, reduce the need for follow-up requests for information, and enable regulators to make more timely and informed decisions.

We understand that section 15.B of the Producer Licensing Model Act (Model Law #218) requires insurers to provide additional documents pertaining to the termination upon written request of the insurance commissioner. In states that have adopted the model language with no

additions, allowing insurers the option of providing additional documentation in their initial termination notices will reduce the number of written requests for additional information that insurers receive.

Specifically in Missouri, this change would also eliminate an automatic follow-up request for additional information, further reducing the regulatory burden on insurers. Missouri regulation 20 CSR 700-1.130(3) requires that a notice of termination for one of the reasons set forth in section 375.141, RSMo, modeled after section 12 of the Producer Licensing Model Act, “shall be accompanied by a report or summary of the acts of the insurance producer believed to violate section 375.141, RSMo, and copy of the documentation collected by the insurer that led to the termination.”

To implement this recommendation, we suggest the following change to the "Documents Attached" section of the form:

- **Add two new line items:** "Investigative Report (if applicable): [Yes/No drop down]" and “Other Documentation: [Yes/No drop down]” directly below the existing "Producer's termination letter" item.

We believe this small change will increase the efficiency and effectiveness of the for-cause termination notification process for both insurers and regulators.

Thank you for the opportunity to comment. We are hopeful that you will consider this recommendation.

Sincerely,



Brogan Dinolfo
Manager, Regulatory Operations
Missouri Department of Commerce and Insurance

North Dakota Comment – TFC Form 9.28.26

A few suggestions from North Dakota:

1. Move the Reason for Termination section to the first page at the top- if they don't have one of the reasons listed for the appointment termination they won't need to fill out the entire form.

2. Wouldn't we have the company terminate the appointment in NIPR for term for cause as well as fill out the form:
   All other appointment changes may be electronically processed using NIPR (National Insurance Producer Registry) unless a different format is prescribed by the state insurance commissioner.

   If the company doesn't terminate the appointment in NIPR- who is going to do it?

3. The below section: Please terminate the appointment Y/N- shouldn't the company terminate the appointment for all term for cause….

   Additional Information REQUEST FOR TERMINATION OF APPOINTMENT
   Effective Date of Termination: [text block]
   PLEASE TERMINATE THE APPOINTMENT Y/N

4. Did the insurer file a fraud referral against the producer? [Yes/No drop down]
   If Yes, identify the agencies with which the referral was filed: [check boxes: NAIC-OFRS; NICB; Other – with blank space to identify the agency, etc.)
   - Can we add box to have them add a report number- I know for OFRS there is a report number not sure about NICB etc. but it would help us connect cases and not doing duplicative work in other state divisions

SUSAN DAOU |Division Director, Producer Licensing
North Dakota Insurance & Securities Department

Ohio Comments – TFC Form 9.30.26

My only comment on the form surrounds the “PLEASE TERMINATE THE APPOINTMENT Y/N”. I feel like this opens the door for companies to rely on the state to terminate the appointment instead of terminating through NIPR. My suggestion would be to remove this.

I am fine with keeping “APPOINTMENT HAS BEEN TERMINATED IN THE SYSTEM BY THE COMPANY Y/N” as this could just be used as a reminder or confirmation the companies did in fact terminate the appointment in the system.

Thanks!

Lindsey Jones
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The State of Ohio is an Equal Opportunity Employer and Provider of ADA Services.

Company Notice of Termination for Cause

Company report of termination FOR CAUSE only.
This form should not be used for normal production cancellations.

All other appointment changes may be electronically processed using NIPR (National Insurance Producer Registry) unless a different format is prescribed by the state insurance commissioner.

⇨ **Producer/Advisor Information**

Producer name as it appears on NIPR: [text block]

NPN (National Producer Number): [number block]

Producer's State of Residence: [text block]

Resident State License #: [text block] (optional)

Producer's Last Known Address: [text block]

⇨**Reporting Insurer Information:**

Name of Insurance Company: [text block]

NAIC CoCode: [number block]

Address of Insurance Company: [text block]

Requests for additional information related to this termination for cause are to be sent directly to the "Authorized Contact for Investigation Follow Up" identified below.

Authorized Contact for Investigation Follow Up:
The Department may request additional information on this submission.

NOTE: DIRECT contact information is required; general 800 numbers and shared mailboxes are not acceptable.

Contact Name: [text block]

Title: [text block]

Contact Phone Number: [text block] (ext)

Contact email address: [text block]

Alternate Contact Name: [text block]

Alternate Contact mail address: [text block]

Email Address: [text block]

Title: [text block]

Name of Firm Contact: [text block]

⇨ **Documents Attached (add ability to attach termination letter)**

Producer's termination letter: [Yes/No drop down]

⇨ **Additional Information REQUEST FOR TERMINATION OF APPOINTMENT**

Effective Date of Termination: [text block]
PLEASE TERMINATE THE APPOINTMENT Y/N
APPOINTMENT HAS BEEN TERMINATED IN THE SYSTEM BY THE COMPANY Y/N

Was the producer notified of the termination? Y/N

Date Notified: [text block]

Line(s) of business included in this termination for cause: [text block]

Is there a prior complaint history with this producer? [Yes/No drop down]

Did the insurer conduct an investigation of this producer? [Yes/No drop down]

DRAFT

Investigation start date: [text block]

Were other producers identified in the insurer's investigation? [Yes/No drop down – add blocks to include the names/NPNS]

Producer name [NAME] [NPN]
Producer name [NAME] [NPN]

***Note: a form submission should be made for each individual producer terminated as well as added to the boxes above.**

Did the insurer file a fraud referral against the producer? [Yes/No drop down]

If Yes, identify the agencies with which the referral was filed: [check boxes: NAIC-OFRS; NICB; Other – with blank space to identify the agency, etc.)

Was the producer contracted with a producer agency at time of misconduct/investigation? [Yes/No/Unknown drop down]

If Yes, identify the agency and NPN: [text block]

⇨ **Reason for Termination**: [drop down of choices from NAIC Producer Licensing Model Act Section 12 A (1)–(14)]

If a termination is for any of the reasons listed in the NAIC Producer Licensing Model Act, Section 12, "License Denial, Non-Renewal or Revocation of Model #218," insurers are required to notify the insurance commissioner(s) within thirty (30) days of the effective date of the termination for cause. See attached PRODUCER LICENSING MODEL ACT document.

States listed below are being notified of a termination for cause against the producer/advisor identified on this document		
State	Business was sold in this state	Consumers were associated with this issue (regardless of if they were actually harmed).
[drop down]	[Yes/No drop down]	[Yes/No drop down]

⇨ **Attestation by Authorized Insurer/Representative**

I attest and affirm that I am authorized to submit all statements on this form. I further attest that any supporting documents are true and accurate, and to the best of my knowledge; and are made for the purpose of notifying the state(s) indicated regarding the appointment termination for cause, as indicated by this completed form.

Name of Insurer's Representative: [text block] Title: [text block]

Email Address: [text block]

Mailing Address: [text block]

Direct Phone Number [text block]

Insurer Representative Signature: _____ Date: [date text block]

Disclosure: This termination for cause notice is submitted in accordance with applicable state and federal regulations and may be shared with regulatory authorities and authorized parties as permitted by law.

DRAFT

West Virginia's TFC Form Comments – 9.28.26

Below are WV's comments on the Termination for Cause form, specifically about the section in the screenshot.

⇨ **Reason for Termination**: [drop down of choices from NAIC Producer Licensing Model Act Section 12 A (1)–(14)]

If a termination is for any of the reasons listed in the NAIC Producer Licensing Model Act, Section 12, "License Denial, Non-Renewal or Revocation of Model #218," insurers are required to notify the insurance commissioner(s) within thirty (30) days of the effective date of the termination for cause. See attached PRODUCER LICENSING MODEL ACT document.

States listed below are being notified of a termination for cause against the producer/advisor identified on this document		
State	Business was sold in this state	Consumers were associated with this issue (regardless of if they were actually harmed).
[drop down]	[Yes/No drop down]	[Yes/No drop down]

1) There needs to be an open text box for the company representative to give a narrative of what the producer did. It doesn't need to be a required field, but many times the companies like to give a full breakdown of what happened.

2) WV requires that the company tell us how many WV consumers were affected by the "Cause" of the termination. That is what triggers us to decide if we are going to do an investigation. A yes/no drop down would not be sufficient for our needs.

Thank you,

--

Brittany V. Moles, MBA, APIR

Director, Licensing and Education Division

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October 28, 2026

Monicka Richmeier
Chair, NAIC Producer Licensing (D) Task Force (PLTF)

Richard Tozer,
Vice Chair, NAIC Producer Licensing (D) Task Force (PLTF)

Re: Proposed Company Notice of Termination for Cause Form

Dear Chair Richmeier and Vice Chair Tozer:

The American Council of Life Insurers (ACLI) appreciates the opportunity to provide feedback on the Task Force's exposure of a proposed Company Notice of Termination for Cause form. ACLI supports the implementation of uniform producer licensing initiatives and strongly encourages the adoption of a standardized approach for appointing and terminating insurance producers across all jurisdictions.

General Commentary

Currently, more than twenty states maintain unique variations of termination-for-cause reporting forms. These forms differ significantly in both format and information requirements necessary to process a termination for cause. As a result, insurers must maintain state-specific procedures and coordinate among multiple internal departments to ensure the appropriate form is completed and submitted in accordance with each insurance department's prescribed requirements. This fragmented approach creates unnecessary administrative complexity and increases the risk of inconsistencies in reporting.

The current state-specific termination-for-cause reporting requirements do not provide insurers with the opportunity to submit all relevant information supporting the termination decision within a single communication. Consequently, regulators frequently need to request additional information before they can adequately assess the circumstances surrounding the producer's termination.

After submitting termination-for-cause reports, companies routinely receive follow-up inquiries seeking details that are not captured on the existing state-specific forms. The current reporting framework limits an insurer's ability to provide a comprehensive summary of the conduct that led to the termination, reducing regulators' ability to promptly evaluate whether further regulatory action may be warranted.

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 94 percent of industry assets in the United States.

The need for these additional inquiries results in inefficiencies for both regulators and insurers and delays the regulatory review process.

The proposed NAIC draft form includes the key data elements frequently requested by regulators and provides insurers with the ability to submit detailed information regarding the facts and circumstances that led to the termination for cause. The standardized form would allow insurers to provide a complete and meaningful report at the time of the initial filing, reducing the need for subsequent information requests and facilitating more timely regulatory review.

Identified Areas for Improvement

To make this proposal even stronger as a tool for industry and regulators, ACLI does have several items and questions we would like to see addressed prior to adoption focused on clarity and the purpose of the document itself.

For instance, on Page 2 of the form under "Reasons for Termination", additional clarity should be provided around "Consumers were associated with this issue (regardless of if they were actually harmed)". It's unclear whether this is asking if consumers were active participants in any wrongdoing, if any consumers were harmed, or if it's asking something else. Therefore, the proposal may benefit from further guidance regarding terms such as "consumers associated with this issue" and how insurers should identify applicable states when producer licensing, business activity, and consumer residency span multiple jurisdictions.

Similarly, the following question may cause confusion: "Were other producers identified in the insurer's investigation?" The term 'identified' is overly broad. It could mean that the insurer merely encountered other producers' names during its investigation. Alternatively, it could mean that the insurer found another producer to be involved in the activity underlying the investigation or termination for cause and also took action against that producer. To make the question more precise and get at what we believe is the core of the question, we propose the following formulation:

As a result of its investigation, did the insurer terminate for cause or report to any regulator any other producers?

ACLI also has the following feedback for regulators' consideration:

- Role of the Form Relative to Existing State Reporting: It would be helpful for the Task Force to address whether the form is intended to replace current agency notifications and state DOI letters, including any narrative and attachments currently provided through those letters, or whether insurers should expect to continue separate state submissions. The proposed form should serve as a standardized reporting mechanism and should not expand existing statutory reporting obligations, reporting thresholds, or filing deadlines. To the extent practicable, the process should also reduce redundant state reporting requirements while recognizing that insurance producer appointment and termination reporting and securities registration reporting remain subject to separate regulatory requirements.

- Complaint History: The form may benefit from clarifying what constitutes "prior complaint history". It is unclear whether this is intended to capture only sales practice, misconduct, and regulatory-related complaints, or if it would also include service-related complaints. Similar

questions exist about whether this part of the form is meant to encompass complaints that are old, unsubstantiated, or resolved without adverse findings. A narrower definition may be necessary to promote consistency in reporting and regulators may want to include a defined look-back as well, such as "in the last ten years". It could also be beneficial for the Task Force to:

  - Clarify whether the inquiry is limited to the reporting insurer or extends to affiliated companies,
  - Add an "Unknown" or "Unable to Determine" option where the insurer cannot reasonably provide a definitive answer, and
  - Provide guidance on whether complaints are limited to those in the state requesting the information or if they also include other jurisdictions where the agent is licensed.

- Confidentiality: Prior to adoption, the Task Force should address confidentiality protections for privileged and sensitive information that may be submitted through the form such as consumer NPI and unverified allegations. Additionally, the Task Force should clarify the form's coordination with existing state-fraud reporting deadlines and SAR procedures, including how the form should handle questions that touch on SAR confidentiality.

- Definition of Investigation: The form should clarify what is meant by an "investigation." Is this intended to refer to a formal fraud or misconduct investigation (e.g., SIU investigation), or would it also include fact-finding reviews conducted by Agency Management, Compliance, Sales Supervision, Legal, or other business functions that ultimately resulted in the termination?

- Providing an Investigation-Status Option: In connection with the questions asking whether the insurer investigated the producer and when the investigation started, regulators should consider adding a means of indicating that an investigation remains ongoing or was closed incompletely. This is particularly important when a producer resigns during an investigation and the insurer cannot reach a final determination. Additionally, there may be situations where the individual is termed prior to the conclusion of the investigation so companies should be able to note that it is ongoing, particularly since the form is asking if other producers were identified (which may be information companies do not yet have). Therefore, the form should distinguish the existence of an investigation from its completion and outcome. It would also be helpful for each form to have intake or submission identifier so insurers can track a filing and link later supplements to it.

- Fraud Referral Questions: The question regarding whether a fraud referral was filed could create reporting concerns where referrals are voluntary, confidential, protected by statute, or handled differently across jurisdictions. Clarification regarding the purpose and intended use of this information may be helpful. For example, an insurer may need to submit the termination-for-cause notice before determining whether a fraud referral is warranted. The form should permit an accurate response based on the information available at the time of submission and, as discussed above, allow supplemental information once the determination is made.
  - Further, the form specifically asks whether a fraud referral was filed and, if so, whether it was submitted through NAIC-OFRS, NICB, or another agency. The NAIC should evaluate whether information submitted through these existing channels is already accessible to the relevant state insurance departments and whether additional reporting through the termination form provides a meaningful regulatory benefit. Where information is already available, the NAIC should consider leveraging existing reporting systems or limiting

additional requirements to information necessary to address a demonstrated regulatory need.

- Attestation and Accountability: The form appears to contemplate a named individual certifying information that may be sourced from multiple functions. Additional clarity regarding who is expected to attest to the submission, and how organizations should handle information compiled across multiple areas, may be helpful.

- Producer Notification and Termination Documentation: The form permits attachment of a termination letter, but it is not entirely clear whether such documentation is required or how situations should be handled when no formal termination letter exists. It would also be helpful for the Task Force to address the timing of notice to the producer and confirm if the form requires insurers to disclose confidential investigative information in that notice.

- Operational and Reporting risk Considerations: For the section identifying states being notified of a termination for cause, clarify the intended scope of reporting across jurisdictions, including the requirements to indicate whether business was sold in each state and whether consumers were associated with the issue, regardless of whether they were actually harmed. The NAIC should also consider the timing of these disclosures, particularly when relevant facts or separate reporting determinations remain unresolved. Requirements should be clear, practicable, and designed to avoid unnecessary duplication across jurisdictions.
    - Given the breadth of information requested, the proposal could increase coordination requirements and create additional timeliness and completeness challenges for insurers. Regulatory findings in this area often focus on reporting delays, notification requirements, and incomplete submissions, making clear ownership and process expectations particularly important.
    - Additionally, companies may need to consider how to build out a process that identifies who has ownership of the form and a method to determine which areas would be tasked with responding for each section on a case-by-case basis since it varies depending on facts and circumstances.

- Producer Agency: Is there a definition of "producer agency"? As drafted, the form does not appear to define the term, which could lead to varying interpretations.

<u>Conclusion</u>

Although we have identified several areas requiring additional consideration and explanation, ACLI supports the eventual adoption of this form. The adoption of the proposed NAIC Company Notice of Termination for Cause form would improve efficiency, promote consistency, enhance regulatory oversight, and reduce unnecessary administrative burdens for both insurers and state insurance departments. A uniform reporting process would also provide regulators with more complete and actionable information while enabling insurers to meet their reporting obligations in a clear, consistent, and compliant manner.

Thank you once again for the opportunity to provide this feedback and we look forward to additional discussion of this item soon.

Sincerely,

David M. Leifer Colin Masterson

cc: Tim Mullen, NAIC; Greg Walker, NAIC

American Property Casualty Insurance Association
INSURING AMERICA apci.org

October 28, 2026

Tim Mullen
Director, Market Regulation
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000,
Kansas City, MO 64106-2197

RE: Uniform Termination for Cause Form – APCIA Comments

Sent by Electronic Mail to: TMullen@naic.org

Dear Mr. Mullin:

The American Property Casualty Insurance Association (APCIA) appreciates the opportunity to provide comments to the NAIC Producer Licensing (D) Task Force regarding the proposed Uniform Termination for Cause Form. APCIA supports efforts to promote greater uniformity and efficiency in producer licensing and termination processes across the states.

APCIA and its members are supportive of a Uniform Termination for Cause Form.

As the Task Force continues its work on the form and the process for submitting termination-for-cause information, APCIA respectfully offers several recommendations on behalf of our members related to several aspects of the proposal and that we believe would improve the form's usefulness and reduce unnecessary administrative burdens for insurers.

Recommended Enhancements to the Form and Submission Process

APCIA also encourages the Task Force to consider several enhancements that could provide additional information to regulators while making the submission process more efficient for insurers:

- **Narrative statement of facts.** APCIA recommends adding a narrative field that would allow the submitting insurer to provide a statement of facts explaining the basis for the termination. Some states currently require such information, and

incorporating a narrative field into the uniform form could provide regulators with useful context regarding the reason for the termination.

- **Reduced manual data entry.** APCIA recommends incorporating features that minimize the need to repeatedly enter the same information. For example, the system could retain appropriate information from an initial submission so that it can be carried forward when the same termination must be reported for another company.
- **Company information.** APCIA recommends allowing the submitting insurer to select the appropriate company from a dropdown connected to the NAIC company database, with the company name and NAIC company code automatically populated. This could reduce manual entry and the potential for data-entry errors.
- **Submission confirmation and recordkeeping.** APCIA recommends providing a confirmation following each submission that identifies the date and time of submission, the states notified, and a copy of the completed form. Insurers should also be able to access and retain this information for their internal compliance and recordkeeping purposes.
- **Agency Appointment Terms:** APCIA recommends that the form conform to processes and be intended to be used for agency appointment termination for clause as well as individual terminations.

APCIA appreciates the Task Force's efforts to create a more uniform approach to termination-for-cause reporting. Thank you for considering APCIA's comments.

Sincerely,

Michael Richmond-Crum
Senior Director, Personal Lines, and Counsel
American Property Casualty Insurance Association



October 28, 2026

Tim Mullen
Director, Market Regulation
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000,
Kansas City, MO 64106-2197

RE: Uniform Termination for Cause Form – Request for Clarity (Addendum to APCIA Comments on the Same)

Sent by Electronic Mail to: TMullen@naic.org

Dear Mr. Mullin:

In conjunction with Comments provided to the NAIC Producer Licensing Task Force (PLTF), submitted on behalf of APCIA members, we have received a request for clarification on several points relating to the scope and application of the forms. We are submitting these questions and request for clarification at the pleasure of the Taks Force.

We are submitting this letter separately to allow for more efficiency in Task Force consideration of comment submitted in relation to the Uniform Termination for Cause Form, currently exposed for comment by the PLTF. We are willing to include this material in the initial letter of the Task Force if it is willing to consider the questions and comments simultaneously.

Please understand that clarity on these points may impact our comments and positions on the recommendations submitted under separate cover to yourself.

Clarifications Regarding the Uniform Process

If the Task Force is willing to do so, APCIA respectfully requests that the Task Force clarify the following:

- Confirm that this one form will inform all impacted states and replace all current state for-cause forms and submission processes.
- Confirm that this form is also intended to be used for Agency appointment terminations for cause. (This request for clarification coincides with APICA's

recommendation that the form be used for Agency appointment termination, submitted to the PLTF under separate cover on the same date.)

- In a multi-state termination for cause scenario, clarify what a state will see/receive from the form. Will every state see all the data on the form or just their state-specific information?
- Where will the submissions be stored, will the carriers be able to revisit them if needed, and the retention period?

We appreciate that the task force's role is not directly aligned with providing specific advice, and some questions may extend beyond the knowledge or charge of the Task Force, however we would appreciate the Task Force's expertise in offering insights on the requests for clarification above.

Sincerely,

Michael Richmond-Crum
Senior Director, Personal Lines, and Counsel
American Property Casualty Insurance Association

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October 28, 2026

Commissioner Vicki Schmidt, Chair
Producer Licensing (D) Task Force
c/o Tim Mullen, Director, Market Regulation
Via email: tmullen@naic.org

Re: Exposure Draft- Company Notice of Terminations for Cause

Dear Commissioners Schmidt and Members of the Task Force:

On behalf of our members, the National Association of Mutual Insurance Companies (NAMIC)[1], appreciates the opportunity to comment on the draft Company Notice of Termination for Cause (the "Form"). NAMIC supports a uniform notice that improves consistency across states, reduces administrative burden, and gives regulators timely, useful information. We offer the following recommendations.

1. **Reference immunity and confidentiality protections.** The Form requests significantly more information up from than many states require today. NAMIC presumes that Section 15(E) (Immunities) and Section 15(F) (Confidentiality) of the Producer Licensing Model Act #218, and comparable state laws apply to all information provided. We ask that the Form say so. The current disclosure, which states that the notice "may be shared with regulatory authorities and authorized parties as permitted by law", should be replace with language such as:

   > *"This notice is submitted pursuant to [Section 15 of the Producer Licensing Model Act (#218)] and corresponding state law. Information provided is subject to the immunity and confidentiality protections of those provisions and may be shared only as authorized by law. Submission does not waive any applicable privilege."*

   A related point: Section 15(D) requires insurers to send a copy of the notification to the producer. Sensitive fields, including fraud referrals and other producers identified, should be placed in a confidential supplement that is not part of the producer copy.

2. **Permit monitored shared mailboxes.** The Form prohibits shared mailboxes for the Authorized Contact. Many companies use dedicated team mailboxes for regulatory correspondence because they are monitored by multiple staff, provide coverage during absences and turnover, and support consistent recordkeeping. Department follow-up sent to one individual is more likely to be delayed or

[1] *The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies—including local and regional insurers as well as some of the nation's largest carriers—NAMIC members collectively write $467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.*

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missed. NAMIC recommends that the Form permit a dedicated, monitored team mailbox, together with a named individual and direct phone number for escalation.

3. **Define "Investigation".** "Investigation" has a formal meaning within many companies. A formal investigation often involves internal audit or a special investigations unit, a defined scope, interviews, and a final report. Most for-cause terminations follow a more limited review of the matter. Without a definition, companies will answer inconsistently. NAMIC recommends that the Task Force define the term broadly (e.g. "Any review conducted by or on behalf of the insurer into the conduct resulting in termination") or ask companies to indicate the type of review conducted. The Task Force should also confirm that internal reports are provided only on written request of the commissioner under Section 15(A).

4. **Clarify the investigation start date.** The start date could reasonably be read as the date a complaint was received, the date a matter was referred internally, or the date a formal investigation was opened. NAMIC recommends defining the reference date or making the field optional. Section 15(C) already required supplemental notice if additional reportable information is discovered later.

5. **Define "producer agency".** The term is not defined in Model #218, which uses "business entity". It is unclear whether the questions refers to the licensed business entity through which the producer was appointed, an upline agency or marketing organization, or any employing agency. NAMIC recommends using "licensed business entity" and limiting the questions to business placed with the reporting insurer.

Sincerely,

Erica Weyhenmeyer

Erica Weyhenmeyer, CPCU, MCM, AIE, WCP
Sr. Policy Vice President- Market Regulation & Workers' Compensation
National Association of Mutual insurance Companies (NAMIC)

Vertafore

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October 26, 2026

Via Email: tmullen@naic.org

Tim Mullen
NAIC Staff Support
Producer Licensing (D) Task Force
National Association of Insurance Commissioners

Re: Vertafore Comments on the Company Notice of Termination for Cause Form

Mr. Mullen:

Thank you for the opportunity to comment on the draft Company Notice of Termination for Cause. Vertafore is supportive of the Task Force's efforts to create greater uniformity around this process. We have two proposed edits for consideration:

1. Preserve carrier choice for appointment transactions

   The introductory language currently states: "*All other appointment changes may be electronically processed using NIPR unless a different format is prescribed by the state insurance commissioner.*"

   We recommend revising this language so it does not suggest that carriers must transact directly through NIPR. Today, carriers may process appointment and termination transactions through NIPR directly or through connected service providers. NIPR itself supports both its own application and system-to-system connections.

   We suggest:

   "All other appointment changes may be electronically processed through your organization's solution provider for appointment and termination submissions or directly with the state Department of Insurance."

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This preserves the carrier's existing choice of transaction channel and recognizes the variety of established systems and workflows carriers use today to manage appointment and termination submissions, without unnecessarily prescribing a specific method or platform.

2. Change "Producer name as it appears on NIPR" to "Producer name as it appears on the Producer Database (PDB)"

> The draft currently requests the producer's name "as it appears on NIPR." We recommend referencing the Producer Database (PDB) instead. The PDB is the authoritative repository being referenced, while NIPR is the organization and platform through which the information is accessed. This would make the instruction more precise and help ensure carriers are using the appropriate producer record.

We appreciate the Task Force's work on this effort and the opportunity to provide input.

Sincerely,



Paula Sisneros
VP, Government Solutions
Vertafore

cc: Monicka Richmeier, Kansas
Richard Tozer, Virginia