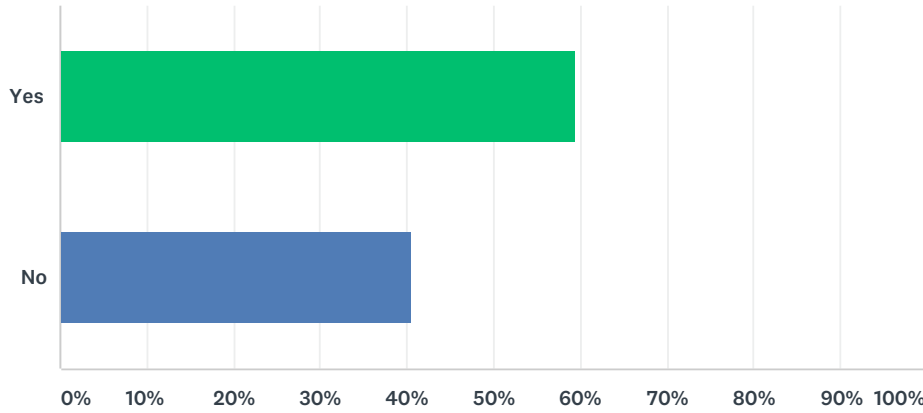# Q1 Would it be beneficial to have the Life MCAS data reported at a more granular level (i.e., broken down and reported by more specific product categories)?
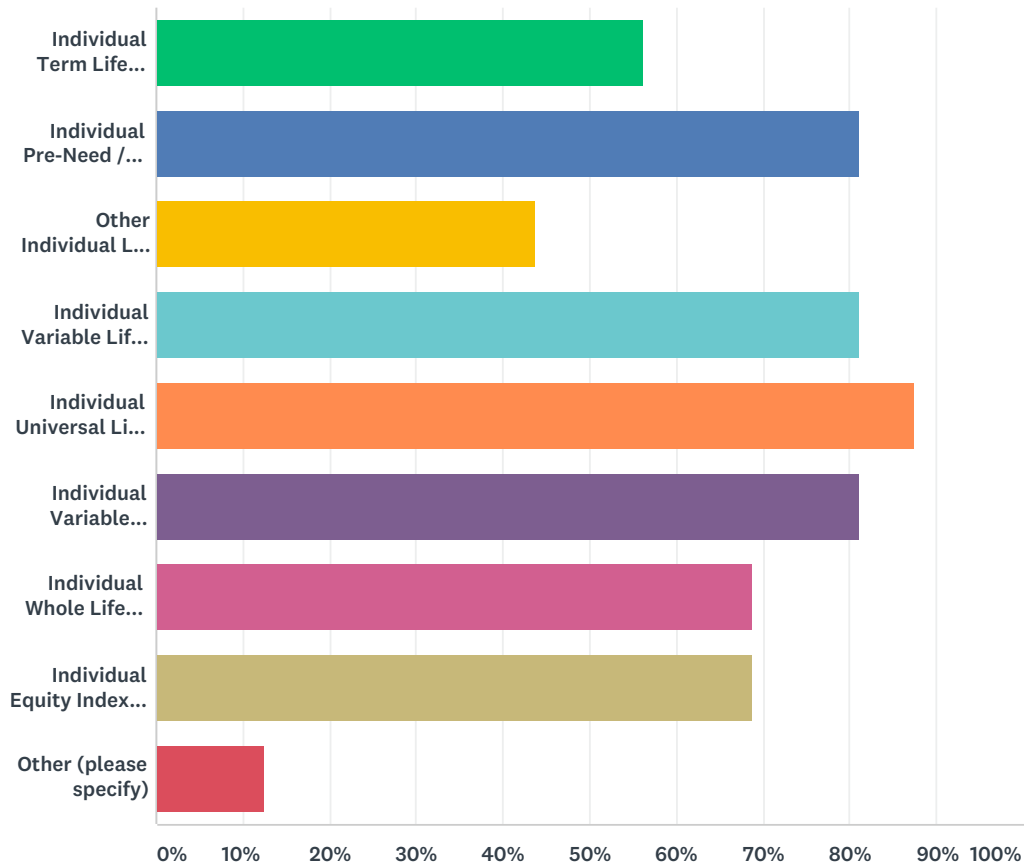
Answered: 32   Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	59.38%	19
No	40.63%	13
TOTAL		32

Q2 An example of "a more granular level" could include the following product categories. Which of the following product categories would be useful to you? [Check all that apply.]

Answered: 16   Skipped: 16

ANSWER CHOICES	RESPONSES	
Individual Term Life Insurance with no Cash Value	56.25%	9
Individual Pre-Need / Funeral / Final Expense Life Insurance	81.25%	13
Other Individual Life Insurance with no Cash Value	43.75%	7
Individual Variable Life Insurance	81.25%	13
Individual Universal Life Insurance	87.50%	14
Individual Variable Universal Life Insurance	81.25%	13
Individual Whole Life Insurance	68.75%	11
Individual Equity Indexed Life Insurance	68.75%	11
Other (please specify)	12.50%	2
Total Respondents: 16		

#	OTHER (PLEASE SPECIFY)	DATE

| 1	We recommend further discussion. We see value in being able to separate preneed contracts and other types of life insurance contracts. We would point out that these categories are not mutually exclusive. For instance, equity indexed universal life insurance is likely a subset of universal life insurance and could be reported under both lines. We need to make sure these are defined so that there is no double counting.	10/9/2018 4:37 PM
2	Maybe Credit/Other with no cash value??	10/2/2018 12:19 PM

Q3 Do you have any comments or concerns regarding any of the product categories listed above or have additional comments related to the product categories?

Answered: 5   Skipped: 27

#	RESPONSES	DATE
1	This may not require such a detailed breakdown, but at a minimum, it would be recommended to separate out the Final expense/pre-need/funeral from other life insurance and because of the possible volatility that could occur in the marketplace, separating out those tied to the market would also be recommended, variable and equity indexed products. This may not require such a detailed breakdown, but at a minimum, it would be recommended to separate out the Final expense/pre-need/funeral from other life insurance and because of the possible volatility that could occur in the marketplace, separating out those tied to the market would also be recommended, variable and equity indexed products.	10/11/2018 5:41 PM
2	There are other products like endowments that are not included. Some consideration should likely be given to the product matrix and the financial annual statement. Whatever changes are considered should also consider how to make the lines of business comport between these two documents.	10/9/2018 4:37 PM
3	No.	10/3/2018 10:47 AM
4	These policies tend to have post underwriting verses initial underwriting. It might be helpful to identify those policies and look at denied claims etc.	10/2/2018 1:25 PM
5	None	9/28/2018 11:02 AM

Q4 Which, if any, specific Life MCAS data elements currently reported are not useful to you and why.
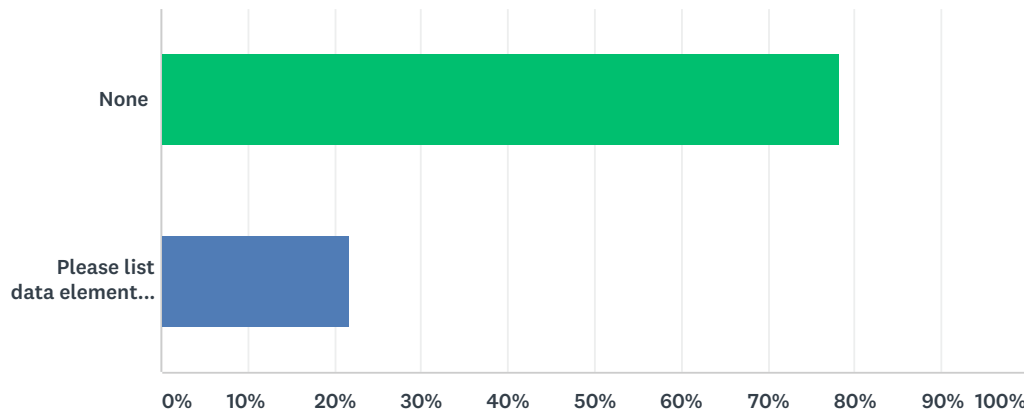
Answered: 23   Skipped: 9
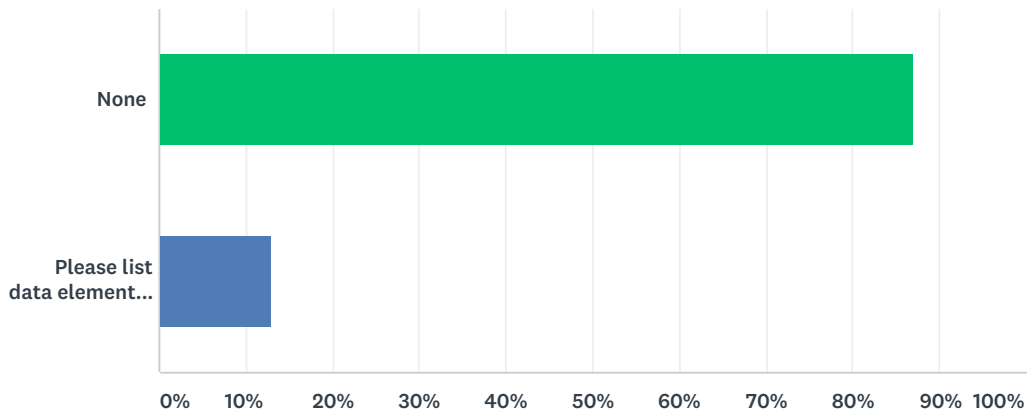
ANSWER CHOICES	RESPONSES	
None	86.96%	20
Please list data elements and any other comments.	13.04%	3
TOTAL		23

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	We do not use the rankings much, although those are not data elements submitted by the companies, they do display on the MAPT full reports. Also the national data is helpful if we are reviewing a domestic, but overall we put more weight on criteria that is state specific.	10/11/2018 5:42 PM
2	I believe most are useful.	10/2/2018 1:27 PM
3	Surrenders broken out by year, is useful if we also knew if surrender fees were applicable.	9/27/2018 3:45 PM

Q5 Are there any data elements that could be added or modified to make the Life MCAS more useful?
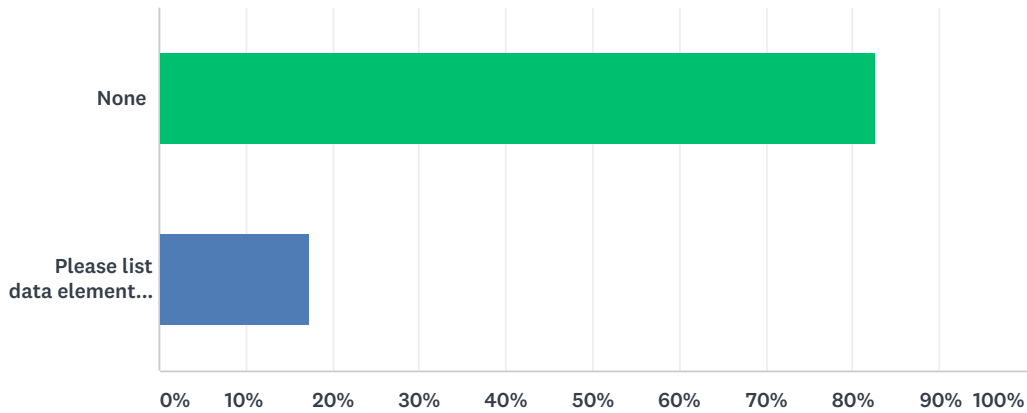
Answered: 23   Skipped: 9

ANSWER CHOICES	RESPONSES	
None	78.26%	18
Please list data elements and any other comments.	21.74%	5
TOTAL		23

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	It would be nice to add percentage change on business written for that line of business between the three years, as it can help analysts easily identify aggressive movement within a line. Could we add calculated columns for % change of premiums written in the state to the MCAS MAPT reports?	10/11/2018 5:42 PM
2	There is no definition of inforce and it may be subject to different interpretations. For example, we have noticed variances based on issue date or effective date.	10/9/2018 4:48 PM
3	Under both ICVP and INCVP sections: 1. Definition of Policies/Contracts Applied for - might be helpful to include not-taken policies(which should be formal offers) in the definition. Currently it states apps that are a formal offer or formal declination. However, I've had confusion with companies reporting data and not including not-taken policies. 2. In addition to above, include a subcategory capturing the # of policies that were not taken. That may provide a more accurate picture of the companies conduct. 3. In addition to the current Death Claims Denied, Resisted or Compromised during the period and Number of Death Claims Denied during the period, which occurred within the contestability period, add more data elements such as: Number of Death Claims Denied, Resisted or Compromised for material misrepresentation. Number of Death Claims Denied where policies were rescinded. Number of Resisted claims remaining open and inforce beyond 1 year. Under ICVP section suggest adding: 4. Number of policies during the year in non-forfeiture status that is involuntarily(by consumer) terminated during the year. 5. Number of policies during the year in non-forfeiture status that voluntarily(by consumer) surrenders the policy prior to the end of the policy term. I've seen many complaints relating to extended term insurance which is the most common non-forfeiture option offered by insurers, didn't know if other states were experiencing the same thing.	10/2/2018 1:27 PM
4	Just additional granularity as previously noted	10/1/2018 3:10 PM
5	Perhaps add a line to the MCAS for number of policies surrendered where a surrender fee was applied. Policy lapses would be a useful add. This could highlight some billing issues, or concerns when a company merges and the policyholder is not aware of new company name when a withdrawal from their bank goes through, or billing envelopes change etc. Unfair or deceptive lapse notice concerns could also be identified.	9/27/2018 3:45 PM

Q6 What, if any, other information would you like to see collected as a Life MCAS interrogatory question, why and what benefit would be derived from collecting the information?

Answered: 23   Skipped: 9

ANSWER CHOICES	RESPONSES	
None	82.61%	19
Please list data elements and any other comments.	17.39%	4
TOTAL		23

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	It is recommended to request if the company utilizes a TPA for the line of business, the name(s) of the TPA and what the TPA does (claims administration, customer service, EFT's, sales, marketing, etc.) If a problem (software, data breach, etc.) was identified with a specific TPA, it would be easier to identify which companies utilize that TPA.	10/11/2018 5:42 PM
2	We find that most companies do not have comments about being a potential outlier because they do not have any basis for comparison to state and national averages at the time of their filing.	10/10/2018 10:21 AM
3	In addition to the ratios created by the NAIC for reviewing the scorecards. I also use the following ratios to compare companies: 1. # of policies surrendered during the period compared to # of inforce policies at the end of the PY period. 2. # of denied death claims during the contestability period compared to Death claims denied, resisted or compromised during the period. 3. # of free looks during the period compared to policies applied for during the period 4. # of policies applied for during the period compared to # of policies issued during the period	10/2/2018 1:27 PM
4	I support the efforts to incorporate illustration certification fields.	10/1/2018 8:51 AM

Q7 Do you supplement the Life MCAS analysis with any internal information or data, such as consumer complaints, market share reports, etc.?

Answered: 23   Skipped: 9
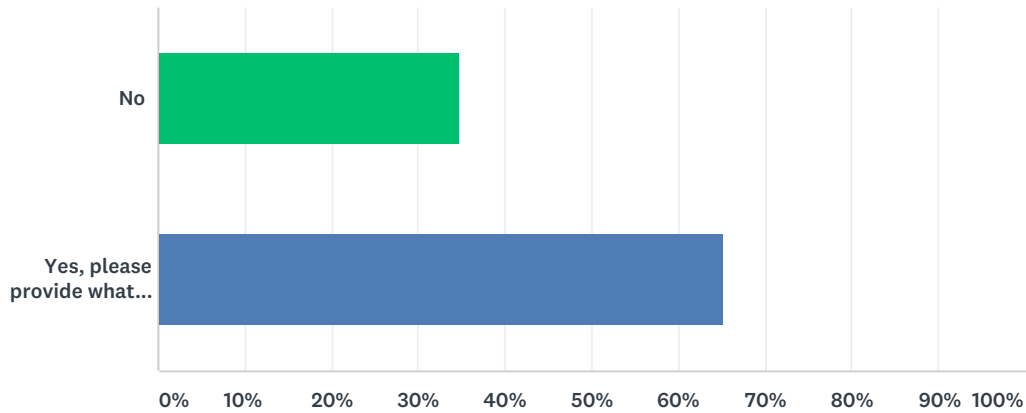
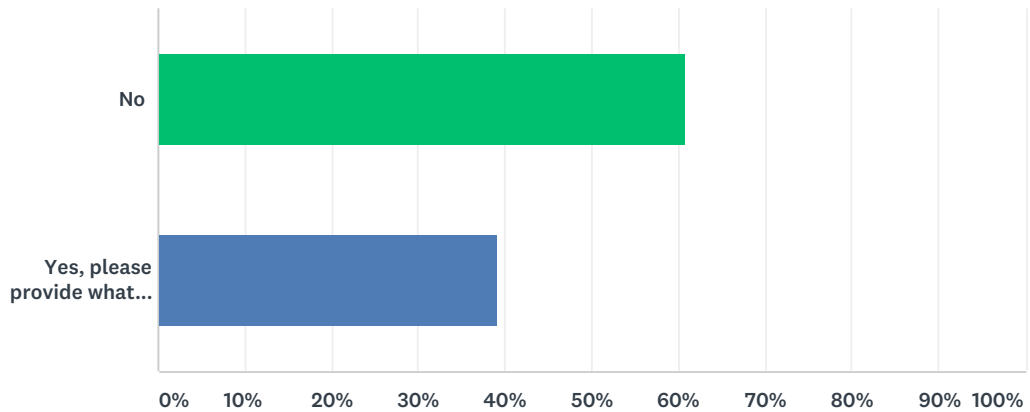| ANSWER CHOICES	RESPONSES	
No	34.78%	8
Yes, please provide what other data you used and a brief explanation of how you used it.	65.22%	15
TOTAL		23

#	YES, PLEASE PROVIDE WHAT OTHER DATA YOU USED AND A BRIEF EXPLANATION OF HOW YOU USED IT.	DATE
1	Other than the complaints data in CDS and generating percentage change for that line of business, we generally wait until the Level 1 to extract additional information. It might be advantageous to provide the interrogatory comments as the last cell of the MCAS MAPT report so we could use that to help determine if we need to conduct further review before we get to the L1 stage. (This could require limiting that field to 256 characters? Perhaps they could do a summary to be used for the MCAS MAPT report and then a details explanation that would display from the MCAS app?) We do get consumer complaint data frequently or sometimes as a result of conducting the L1 after the baseline. It really depends on the specific company, findings, patterns and urgency.	10/11/2018 5:43 PM
2	We would look at the number and content of complaints. If it is a domestic company we might contact our Financial unit to obtain their thoughts on a company.	10/11/2018 4:58 PM
3	We review the complaints received by the Department, as well as compared to those the company receives directly and will contact the company for an explanation if there is a significant increase in direct complaints or when the Department has not received complaints any or a much smaller number than the company. We review the company's premium and market share for any significant increases or decreases. We review for referrals from other sections within the Department that may have found areas of concern in a review of financial information, complaints or filings, etc. We also review whether the Department has previously conducted analysis or exams and the outcome of those actions.	10/11/2018 4:33 PM
4	We gather as much available information to determine which companies should be reviewed using the MARS. This includes state complaints, market share, MAPT reports, bulletin boards, and internal discussion with rate and form analysts and management.	10/10/2018 10:28 AM
5	This depends on the circumstances surrounding the Company and Line of business. Depending on if a carrier is an outlier, we may review and trend complaints, look at market share, policy forms, etc.	10/9/2018 4:56 PM

6	Consumer complaints, complaint index, market share, market analysis profiles, MAPT.	10/3/2018 10:52 AM
7	Score additional data such as premium growth, number of policies written, complaints, RIRS, prior exam findings, etc...	10/2/2018 12:22 PM
8	complaints referrals	10/1/2018 3:11 PM
9	Consumer complaints submitted to the Department & market share reports Company websites & publications Product filings for a better understanding of the company profile AM Best and other rating agencies Web-based searches for	10/1/2018 9:00 AM
10	During baseline analysis, we use MAPT scores, consumer complaints, and market share information with the Life MCAS analysis to prioritize companies for level 1 reviews and possible exam candidates.	9/28/2018 11:13 AM
11	We use internal consumer complaints to determine if there are any trends.	9/28/2018 9:34 AM
12	Consumer complaints reported directly to the bureau and agent/agency licensing and policy form filing activity.	9/28/2018 8:11 AM
13	We always look at internal Insurance Department complaints when analyzing data.	9/28/2018 6:37 AM
14	Consumer complaints, financial reports, Rate & Form filings	9/27/2018 4:02 PM
15	Market share and premium growth over the last year, complaint counts, and state loss claim score - derived from MAPT. We also reach out to other areas of the department for feedback related to company issues that they have identified to take those into consideration when compiling the prioritization list.	9/27/2018 3:45 PM

Q8 Do you supplement your Life MCAS analysis with any external information/data, such as data calls made by the department? Note: the reference to data calls does not include data calls or requests for information that are submitted during a market conduct examination.

Answered: 23   Skipped: 9

ANSWER CHOICES	RESPONSES	
No	60.87%	14
Yes, please provide what other data you used and a brief explanation of how you used it.	39.13%	9
TOTAL		23

#	YES, PLEASE PROVIDE WHAT OTHER DATA YOU USED AND A BRIEF EXPLANATION OF HOW YOU USED IT.	DATE
1	There are occasions where we will conduct a data call on a company as the first step prior to conducting the baseline or doing an L1, it depends on the specific situation.	10/11/2018 5:43 PM
2	We review information available from the financial statement, such as the Management's Discussion and Analysis for any indication of changes in the company's operations in the state, recent activity in the news, as well as the MAPT, complaints received by other states, state complaint ratios, and analysis, exams or initiatives by other states shared through iSite, Bulletin Boards or in RIRS, MATS and MARS. We have sent data calls to companies based upon higher than average MCAS ratios or due to a significant increase in direct complaints.	10/11/2018 4:33 PM
3	yes, we will look at external complaint bulletin boards, producer blogs, class action litigation bulletin boards and other info.	10/9/2018 4:56 PM
4	When lead in that direction.	10/3/2018 10:52 AM
5	Once the MCAS Data is reviewed I write to the company in question and ask for explanations about the data.	10/2/2018 1:28 PM
6	Health insurance survey data is used for a more detailed information about companies' health insurance business and compliance with prompt payment of claims statutes	10/1/2018 9:00 AM
7	We review rating agency (i.e. AM Best, Moody's) reports for companies selected for level 1s.	9/28/2018 8:11 AM
8	Yes, if we have knowledge of a another program area that is conducting a data call or analysis, Market Analysis will make an inquiry.	9/28/2018 6:37 AM
9	A.M. Best reports, company websites, news articles	9/27/2018 4:02 PM

Q9 If you use a state specific data call, please provide a brief description of the data call, whether or not it is required by statute or regulation and how the data is used in the Life MCAS analysis process.

Answered: 4   Skipped: 28

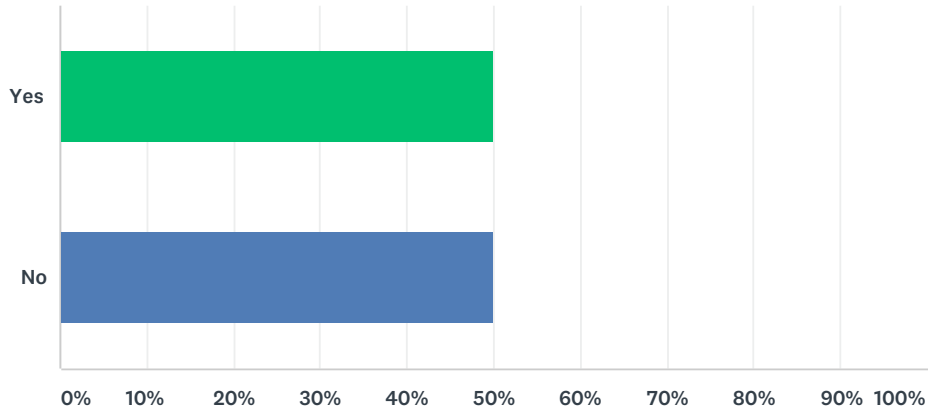| #	RESPONSES	DATE
1	None at this time.	10/11/2018 5:43 PM
2	We do not have any regularly used data calls for life.	10/11/2018 4:33 PM
3	We have a state specific supplement that requires premium and claim reporting by line of business.	10/9/2018 4:56 PM
4	I totally depends on the data call but we would definitely be looking at claims details.	9/28/2018 6:37 AM

Q10 Please provide any additional comments regarding the Life MCAS that you think would be useful.

Answered: 7   Skipped: 25

#	RESPONSES	DATE
1	The calculation of the ratio 4 for policies surrendered under 10 years is not a proven ratio, however the underlying data broken out by under two years from issuance and 2-5 years from issuance could be a better indicator of potential issues as that is when most consumers (especially with annuity products) would incur fees (surrender and other fees.) Perhaps change this ratio to be surrenders under 5 years from issuance to all surrenders and another ratio that looks at surrenders under 2 years from issuance to all surrenders. Also, see the comment above about recommending a calculation for percentage change in premiums written for the line of business for the last three years as part of the MCAS MAPT. Ratio 3 (Policies surrendered to policies issued) for individual life should be recalculated or reported differently as it often produces outliers based on companies not issuing a lot of policies within the state.	10/11/2018 5:44 PM
2	It may be beneficial to capture information on MCAS related to contract state and state of residence.	10/9/2018 4:59 PM
3	MCAS guide that offers suggestions on what each ratio may indicate and what might be an acceptable deviation from the standard ratio.	10/2/2018 1:32 PM
4	Maybe additional dialogue on blanks and interrogatories if tracked by type of life insurance (eg. credit/final expense) to make the blanks more meaningful	10/2/2018 12:23 PM
5	No additional comment.	10/1/2018 9:20 AM
6	None	9/28/2018 11:13 AM
7	I can only speak for [state redacted] but since the inception of Life and Annuity MCAS both Individual and Group, finding outliers is few and far between. It appears the industry is getting better.	9/28/2018 6:39 AM

Q11 Would it be beneficial to have the Annuity MCAS data reported at a more granular level (i.e., broken down and reported by more specific product categories)?
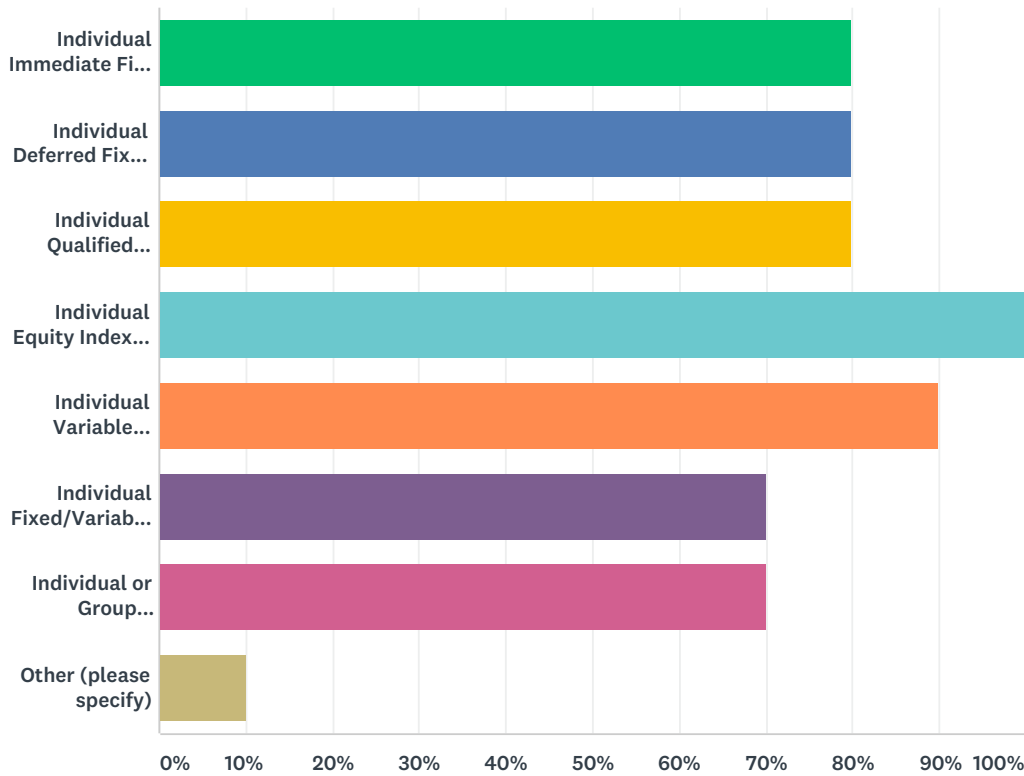
Answered: 22   Skipped: 10

ANSWER CHOICES	RESPONSES	
Yes	50.00%	11
No	50.00%	11
TOTAL		22

Q12 An example of "a more granular level" could include the following product categories. Which of the following product categories would be useful to you? [Check all that apply.]

Answered: 10   Skipped: 22

ANSWER CHOICES	RESPONSES	
Individual Immediate Fixed Annuities	80.00%	8
Individual Deferred Fixed Annuities (other than Qualified Longevity Annuities)	80.00%	8
Individual Qualified Longevity Annuities	80.00%	8
Individual Equity Indexed Annuities	100.00%	10
Individual Variable Annuities	90.00%	9
Individual Fixed/Variable Annuities	70.00%	7
Individual or Group Contingent Deferred Annuities	70.00%	7
Other (please specify)	10.00%	1
Total Respondents: 10		

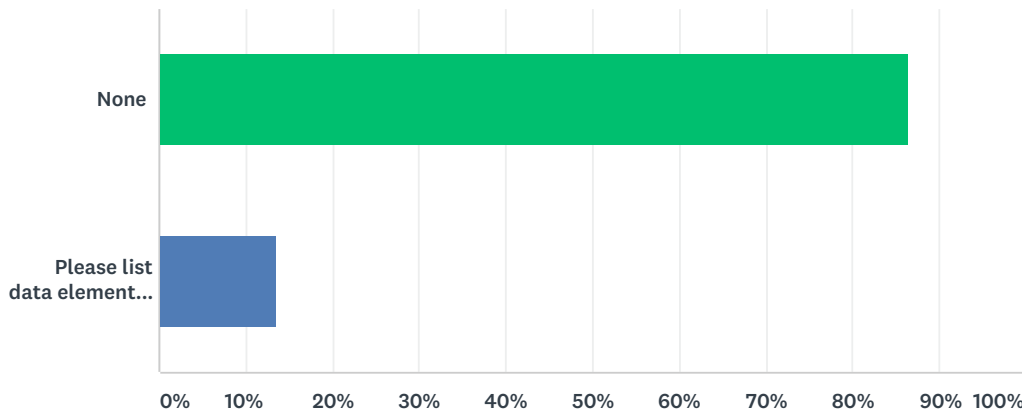| #	OTHER (PLEASE SPECIFY)	DATE
1	we have seen a company consider annuities issued to individuals under a trust created by a company as group contracts. We suggest that we find some way to make sure these type of annuities are captured in the individual MCAS data, since the sale occurred to individuals.	10/9/2018 5:03 PM

Q13 Do you have any comments or concerns regarding any of the product categories listed above or have additional comments related to the product categories?

Answered: 5   Skipped: 27

#	RESPONSES	DATE
1	Is there concern in collecting group contingent deferred annuities? (Could this be perceived as expanding from the individual to group annuities products when MCAS has previously only focused on individual annuities? (Technically group annuities were part of the initial pilot for MCAS but were then eliminated at one point.)	10/11/2018 5:47 PM
2	It would be helpful to know more about the other types of products and how much consumer harm or what types of complaints are generated by those products.	10/11/2018 4:37 PM
3	Unfortunately, I don't have a lot of experience in the annuity market.	10/2/2018 1:36 PM
4	The more granular the better as long as this level of specificity remains large enough to be worthwhile to use.	10/1/2018 9:25 AM
5	None	9/28/2018 11:15 AM

Q14 Which, if any, specific Annuity MCAS data elements currently reported are not useful to you and why.
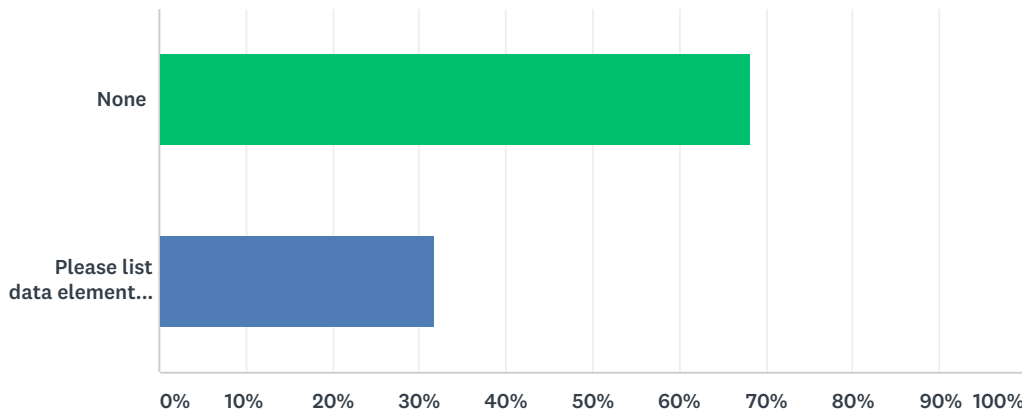
Answered: 22   Skipped: 10

ANSWER CHOICES	RESPONSES	
None	86.36%	19
Please list data elements and any other comments.	13.64%	3
TOTAL		22

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	We do not rely too much on the rankings within the MCAS MAPT which is a calculation and not really considered a data element the companies report. The same thing goes for the number of zero rankings. Although the national data is nice to have, especially if it is a domestic, we generally look more at the state specific data.	10/11/2018 5:48 PM
2	I defer to other states	10/2/2018 1:37 PM
3	Surrender totals are not useful unless we know if there were applicable surrender fees applied to the surrender. Many annuity products have adjusted surrender periods, or surrender periods that can be selected by the owner/annuitant. Knowing that the company had a high number of surrenders between 6-10 years may not be as meaningful.	9/27/2018 3:46 PM

Q15 Are there any data elements that could be added or modified to make the Annuity MCAS more useful?
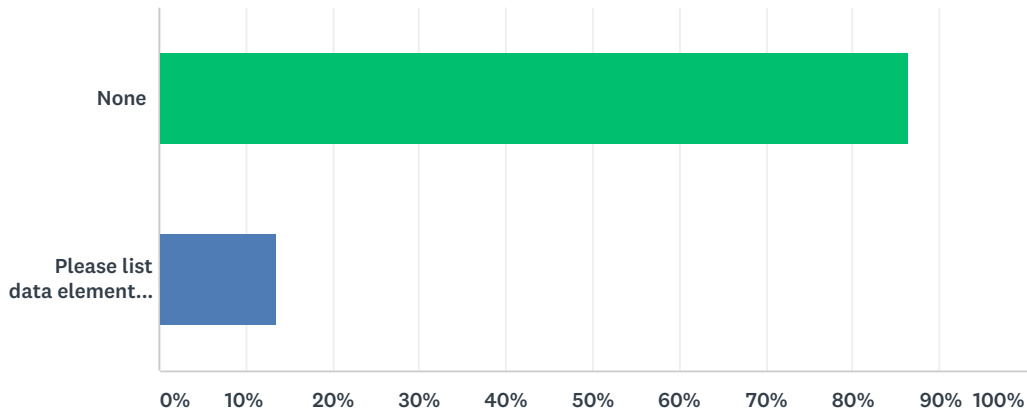
Answered: 22   Skipped: 10

ANSWER CHOICES	RESPONSES	
None	68.18%	15
Please list data elements and any other comments.	31.82%	7
TOTAL		22

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	Would it be possible to either further define internal vs. external replacements or perhaps create an internal, external and a sister company external? The reason is that from a consumer perspective, there is no difference between when a policy is replaced externally or from an external sister company, consumers still incur the potential to pay surrender fees, new commissions, etc. A sister company external (feel free to rename) would be technically within the same group of companies, but a different company within that group. This could be an indicator of churning.	10/11/2018 5:48 PM
2	we recommend a definition for inforce.	10/9/2018 5:05 PM
3	I defer to other states	10/2/2018 1:37 PM
4	Just the additional granularity as noted previously	10/1/2018 3:12 PM
5	Elements regarding surrender charges imposed may be helpful.	10/1/2018 9:03 AM
6	Number of Death Claims Closed With Payment, During the Period, within 30 Days Number of Death Claims Closed With Payment, During the Period, within 31-60 Days Number of Death Claims Closed With Payment, During the Period, Beyond 60 Days	9/28/2018 11:18 AM
7	Add a line requesting number of contracts surrender where a surrender fee was assessed. (See rationale in question 14 response.)	9/27/2018 3:46 PM

Q16 What, if any, other information would you like to see collected as an Annuity MCAS interrogatory question, why and what benefit would be derived from collecting the information?

Answered: 22   Skipped: 10

ANSWER CHOICES	RESPONSES	
None	86.36%	19
Please list data elements and any other comments.	13.64%	3
TOTAL		22

#	PLEASE LIST DATA ELEMENTS AND ANY OTHER COMMENTS.	DATE
1	Request if the company utilizes a TPA for the line of business, the name(s) of the TPA and what the TPA does (claims administration, customer service, EFT's, sales, marketing, etc.) If a problem (software, data breach, etc.) was identified with a specific TPA, it would be easier to identify which companies utilize that TPA.	10/11/2018 5:48 PM
2	See life response.	10/10/2018 10:37 AM
3	I defer to other states	10/2/2018 1:37 PM

Q17 Do you supplement the Annuity MCAS analysis with any internal information or data, such as consumer complaints, market share reports, etc.?

Answered: 22   Skipped: 10
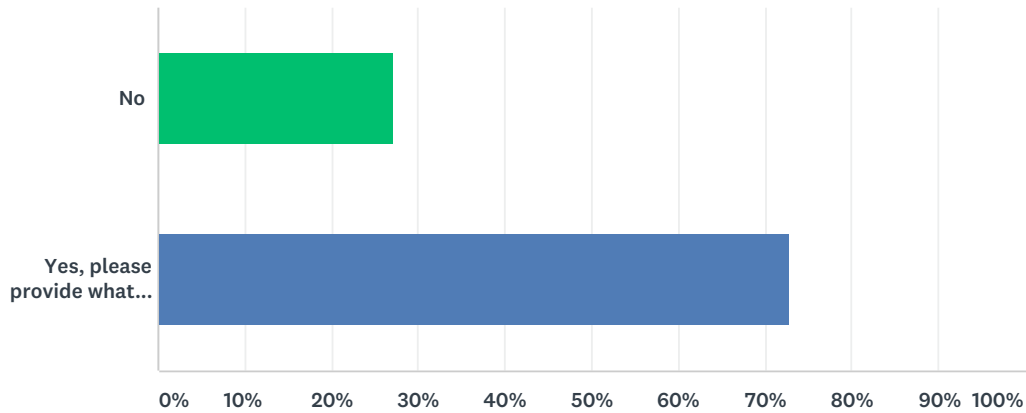
ANSWER CHOICES	RESPONSES	
No	27.27%	6
Yes, please provide what other data you used and a brief explanation of how you used it.	72.73%	16
TOTAL		22

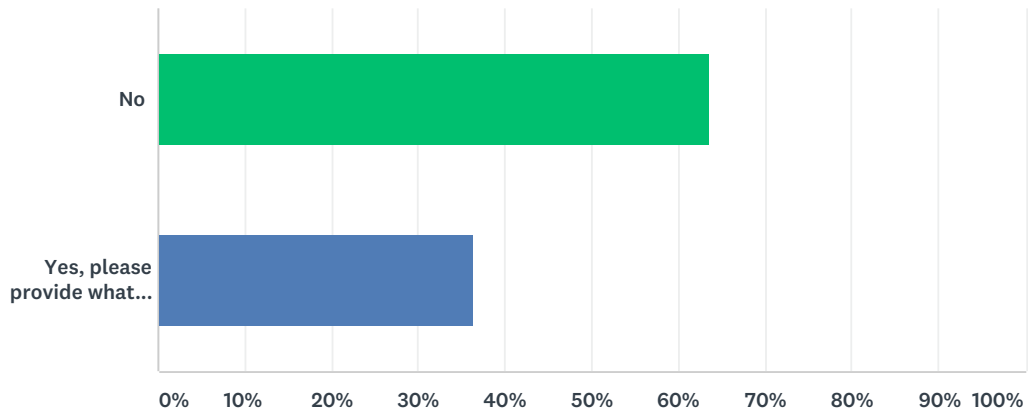| #	YES, PLEASE PROVIDE WHAT OTHER DATA YOU USED AND A BRIEF EXPLANATION OF HOW YOU USED IT.	DATE
1	We do bring in complaints from the CDS.	10/11/2018 5:49 PM
2	We would look at complaints.	10/11/2018 4:59 PM
3	The same information listed in response to this question for the Life MCAS.	10/11/2018 4:38 PM
4	See life response.	10/10/2018 10:37 AM
5	see life response	10/9/2018 5:07 PM
6	Consumer complaints, complaint index, market share, MAPT, market analysis profiles.	10/3/2018 10:53 AM
7	Internal documentation such as complaints, prior exam findings, etc.	10/2/2018 12:25 PM
8	Complaints Referrals	10/1/2018 3:13 PM
9	Complaints AND market share.	10/1/2018 9:27 AM
10	Similar information to that identified in the life section	10/1/2018 9:04 AM
11	During baseline analysis, we use MAPT, consumer complaints and market share information with the Annuity MCAS analysis to prioritize companies for level 1 analysis and possible exam candidates.	9/28/2018 11:19 AM
12	We analyze internal consumer complaints to determine if there are any trends.	9/28/2018 9:36 AM
13	Consumer complaints reported directly to the bureau and agent/agency licensing and policy form filing activity.	9/28/2018 8:11 AM
14	Internal Insurance Department Compaints.	9/28/2018 6:41 AM
15	Consumer complaints, Financial reports, Rate & Form filings	9/27/2018 4:03 PM

| 16 | We utilize the internal information provided in the MAPT report and calculate premium/market share growth over the last year, and number of complaint both confirmed and complete reported. We also request information from all other areas of the department to determine if a company should be added to the prioritization list. | 9/27/2018 3:46 PM |

Q18 Do you supplement your Annuity MCAS analysis with any external information/data, such as data calls made by the department? Note: the reference to data calls does not include data calls or requests for information that are submitted during a market conduct examination.

Answered: 22   Skipped: 10

ANSWER CHOICES	RESPONSES	
No	63.64%	14
Yes, please provide what other data you used and a brief explanation of how you used it.	36.36%	8
TOTAL		22

#	YES, PLEASE PROVIDE WHAT OTHER DATA YOU USED AND A BRIEF EXPLANATION OF HOW YOU USED IT.	DATE
1	Not at the time, but we often conduct interrogatories after we conduct the baseline analysis and Level 1 to obtain further clarification on the MCAS data.	10/11/2018 5:49 PM
2	The same information listed in response to this question for the Life MCAS.	10/11/2018 4:38 PM
3	see life response	10/9/2018 5:07 PM
4	When lead in that direction.	10/3/2018 10:53 AM
5	Similar information to that identified in the life section	10/1/2018 9:04 AM
6	Rating agency reports	9/28/2018 8:11 AM
7	It depends on the data call.	9/28/2018 6:41 AM
8	A.M. Best reports, company websites, news articles	9/27/2018 4:03 PM

Q19 If you use a state specific data call, please provide a brief description of the data call, whether or not it is required by statute or regulation and how the data is used in the Annuity MCAS analysis process.

Answered: 4   Skipped: 28

#	RESPONSES	DATE
1	Not at this time.	10/11/2018 5:49 PM
2	We do not have any regularly used data calls for Annuity products.	10/11/2018 4:38 PM
3	see life response	10/9/2018 5:07 PM
4	I t depends on the data call but would definitely look at claims related data.	9/28/2018 6:41 AM

Q20 Please provide any additional comments regarding the Annuity MCAS that you think would be useful.

Answered: 5   Skipped: 27

#	RESPONSES	DATE
1	The calculation of the ratio 4 for policies surrendered under 10 years is not a proven predictor of potential concerns, however the underlying data broken out by under two years from issuance and 2-5 years from issuance is valuable as that is when most consumers (especially with annuity products) would incur fees (surrender and other fees.) Perhaps change this ratio to be surrenders under 5 years from issuance to all surrenders and another ratio that looks at surrenders under 2 years from issuance to all surrenders. Also, see the comment above about recommending a calculation for percentage change in premiums written for the line of business for the last three years as part of the MCAS MAPT.	10/11/2018 5:49 PM
2	It may be useful to collect information based upon the contract state and resident state.	10/9/2018 5:09 PM
3	Nothing further to add.	10/1/2018 9:27 AM
4	None	9/28/2018 11:19 AM
5	Life and Annuity MCAS data has been getting much better since its inception.	9/28/2018 6:43 AM