

From: [Cox, LeAnn](#)
To: [Brandenburg, Aaron](#)
Subject: Notes from Pet Insurance Working Group Call
Date: Tuesday, October 1, 2019 3:19:18 PM
Attachments: [image002.png](#)

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Aaron,

Please see below for my comments from the call.

1. Suggest that the use of “Health” not be implemented into the name of the act. In order to remain consistent I suggest that the term “Care” be used. The NAIC Coding Matrix defines Pet Insurance as, “Veterinary care plan insurance policy providing care for a pet animal (e.g., dog or cat) of the insured owner in the event of its illness or accident.” Using the term care would remove any confusion that this is a health product and the title would remain consistent with the definition as it appears within the matrix.
2. Use of the term group as certificates as used within the model law. Missouri is a state that has not recognized group coverage within Pet Insurance. Missouri has not adopted a P&C group model law. There are certain limited lines that are statutorily defined to allow for group coverage, but Pet Insurance is not one of them.
3. In regards to the Definitions section and the definition of pet insurance. I also this this definition should mirror the definition shown within the coding matrix.
4. I think that definitions within the policy could be stated substantially similar to the model act, as long as they are not less favorable than what is stated with the model act. This may allow for innovation within the market without changing the intent.
5. Disclosures – Where each disclosure section references “link on the main page of the insurer’s Internet Website” should be changed to “prior to purchase”.
6. This is limiting the disclosures to the web based products only, when in fact these products are being distributed through many venues including kiosk.

Please let me know if you have any additional questions.

Thank you,

LeAnn Cox

Property & Casualty Manager

Missouri Department of Commerce & Insurance