

April 17, 2025

Comments from Oklahoma on Complaints (Two comments)

Sent via email to [hmarsh@naic.org](mailto:hmarsh@naic.org) on 04/17/2025

Good afternoon,

After further investigation, my comment needs to be amended.

From CDS data, there are other ways to identify complaint counts related to the following coverages:

- LPI is coded under Level 2 Coverage 190 & 386
- Travel is coded under Level 1 Coverage 744
- STLD is coded under Level 2 Coverage 542

We should get someone to speak to how Other Health complaint counts can be determined. Other Health complaints are not explicitly coded for in CDS. And there are not level 2 coverage codes that cover everything that falls under the Other Health business umbrella. So I am not sure how we can parse Other Health from the other Level 1 Coverage health codes.

If LPI and STLD complaints are only identifiable through a CDS Level 2 Coverage code, it is worth bringing up to the group that Level 2 Coverages are most often not filled out. I would therefore assume company records for these complaint counts would be more accurate. There is an example of this attached where there were 290 STLD complaints filed in CDS in 2023. There were 337 STLD complaints reported by Health companies' MCAS in 2023. 337 is an underestimate of the entire number of complaints reportable by companies since not every company reports every MCAS statement, and for some reason the query only returned Health companies' data, therefore excluding P&C and Life companies. Data tables L2023MCASSTLDLAW and P2023MCASSTLDLAW are not found when searched for in Snowflake or ThoughtSpot. So it could be that their data is not loaded into those systems. As an example that their data does exist relevant to this, life company CoCode 69337 reported 6 Oklahoma DOI complaints in their 2023 STLD MCAS, but there are only 4 coded in CDS.

Thank you,  
Zach

Sent via email to [hmarsh@naic.org](mailto:hmarsh@naic.org) on 04/15/2025

Good afternoon,

It was mentioned in the April 3<sup>rd</sup> Market Conduct Annual Statement Blanks (D) Working Group meeting that the group is proposing to stop collecting “Number of complaints received through DOI/ directly from DOI” for LPI, Other Health, STLD, and Travel from the MCAS. We do not believe this data is collected elsewhere and therefore should continue to be collected through MCAS. If it is being collected elsewhere, we are concerned that it may not be easily accessible.

People on the April 3<sup>rd</sup> call mentioned this data is available elsewhere. We hope that in the next meeting someone can present instructions on where to find what they were alluding to.

Thank you,

**Zach Palank** *FLMI MCM*  
Market Conduct Analyst II



Financial Division  
400 NE 50<sup>th</sup> Street  
Oklahoma City, Oklahoma 73105  
405.522.0445  
[Zach.Palank@oid.ok.gov](mailto:Zach.Palank@oid.ok.gov)  
[oid.ok.gov](http://oid.ok.gov)