

Comments from Oklahoma on Complaints (Three comments)

April 25, 2025 – Third Comment

Sent via email to hmarsh@naic.org

Hey Hal,

With Teresa’s explanation, I have updated my comments:

From CDS data, there are 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

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 noting 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 contained in the attached excel document 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 we know not every company reports every MCAS statement. In this example, only 16 companies reported MCAS complaints while 61 have at least one complaint in CDS.

A summary of the excel document that outlines data supporting my concern is below.

Summary of 2023 STLD complaint counts	
Complaint Count in CDS	290
Complaint Count in MCAS	337

Companies with complaints in CDS	61
Companies with complaints in MCAS	16
Companies reporting more complaints in MCAS than in CDS	11
CDS Complaint count for companies that reported MCAS	210
Percent of complaints reported in MCAS that are missing in CDS	38%

Thank you,

Zach

From: Cooper, Teresa <TCooper@naic.org>

Sent: Wednesday, April 23, 2025 9:37 AM

To: Zach Palank <Zach.Palank@oid.ok.gov>; Marsh, Hal <hmarsh@naic.org>

Cc: Bollin, Kelsey <kbollin@naic.org>

Subject: [EXTERNAL] RE: MCAS Blanks (D) Working Group comment

Good morning Zach,

I wanted to send you a message related to your comments on the Snowflake data not including life and p/c data. Since companies with a Life, P/C and Health financial statement type are all able to submit STLD data, the tables used to store the data are synonym tables. This means that the X, L and P tables each are identical and contain data from all statement types. So, when we load data into snowflake we use the primary financial statement type table. For STLD, that is the X table. That's why you're only seeing the X table references in Snowflake. However, all statement types are included.

Please let me know if you have further questions on this. It is a confusing process.

Thank you,

Teresa Cooper

April 17, 2025 - Second Comment

Sent via email to hmarsh@naic.org

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

April 15, 2025 – First Comment

Sent via email to hmarsh@naic.org

Good afternoon,

It was mentioned in the April 3rd 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 3rd 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,

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