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Commissioner Jon Godfread
Chair, NAIC Innovation and Technology (EX) Task Force
North Dakota Insurance Department
Via-email with copy to Denise Matthews (dmatthews@naic.org)

Re: NAIC Innovation and Technology (EX) Task Force request for comments related to regulatory relief or regulatory accommodations related to innovation and technology

Dear Commissioner Godfread:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit these comments in response to the request of the NAIC Innovation and Technology (EX) Task Force (Task Force) for comments relating to regulatory relief or accommodations related to innovation and technology and the Task Force's engagement on this issue.

Navigating the COVID-19 pandemic has highlighted the need to enhance outdated regulatory requirements, that do not reflect recent transformative advances in online technologies and hinder life insurers' ability to serve consumers and conduct the business of insurance as effectively and efficiently as possible. Fortunately, the state regulatory community, governors and state insurance commissioners, have recognized and granted accommodations to temporarily ameliorate inefficiencies, particularly those associated with document delivery, wet signature, and in-person notarization and producer licensing requirements. The country's instant move to a "work from home," touchless society, during the pandemic has proven that electronic communications technology can be both safe and effective for personal tasks and for functions vital to our economy, including insurance and financial services.

ACLI recommends that the recent temporary accommodations relating to electronic delivery of documents, electronic signatures and notarization and online fulfillment of producer licensing requirements, be made permanent. ACLI believes that the temporary relief given by the regulatory community and the rapid change in business and personal interactions has proven that such enhancements continue to protect consumers and provide consumers with greater access to the critical financial protection products and services they need especially during times of uncertainty.

Current State E-Commerce Laws

The Uniform Electronic Transactions Act (UETA) was adopted by the National Conference of Commissioners on Uniform State Laws (NCCUSL) in 1999. UETA allows regulated entities to

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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 280 member companies represent 94 percent of industry assets in the United States.

conduct business electronically with consumers who have “opted-in” and provides for legal recognition of electronic signatures, records, and transactions. Forty-seven states have adopted UETA. State UETA’s apply to insurance documents and transactions, the electronic creation of insurance contracts and electronic delivery of insurance documents and disclosures, unless the state UETA or other state law expressly provides otherwise.

As indicated above, all the states have not adopted UETA. Also, there are variations in the scope of state UETA’s. Additionally, there are approximately 30 state insurance specific laws or regulations that impose requirements for e-delivery or other e-commerce activities in connection with the business of insurance that vary from state to state. As a result, current state law governing insurers’ right to engage in various e-commerce activities is not as clear, nor as uniform, as desirable. Also, as noted above and discussed further below, state, as well as federal, e-commerce laws continue to include “opt-in” and related requirements that significantly inhibit life insurers’ ability to engage in e-commerce and to implement and use newer, online technologies broadly accepted and desired by consumers.

Recommendation of Model State Insurance Department E-Commerce Bulletin(s)

To most expeditiously make permanent key temporary accommodations offered by the state regulatory community during the pandemic and to provide necessary clarity and uniformity with respect to state law applicable to life insurers’ ability to engage in e-commerce, ACLI suggests adoption of a state insurance department bulletin or bulletins.

Attached to this letter is a draft model state insurance department bulletin. The key purposes of the draft bulletin are to:

- (1) Clarify that the requirements of any state statute, regulation, or guidance that a signature, document, communication, disclosure, delivery or transaction, relating to the conduct of the business of insurance, be in written/tangible form or performed in person are satisfied by a signature, document, communication, disclosure, delivery or transaction that is in electronic form or performed electronically consistent with the requirements of the state UETA or similar law, unless the statute, regulation or guidance expressly prohibits such electronic signature, document, communication, disclosure, delivery or transaction;
- (2) Clarify the requirements for electronic delivery of documents in connection with insurance transactions;
- (3) Permit remote examinations of and by insurance companies to meet examination and investigation requirements; and
- (4) Permit/clarify that insurance agents may meet pre-licensing and continuing education requirements via electronic/online instruction.

Appended to the draft bulletin is a list of typical state insurance laws that may require signatures, notarizations, documents, communications, disclosures, deliveries or transactions, relating to the conduct of the business of insurance, to be in written/tangible form or performed in-person. Under the bulletin, the requirements of these laws would be satisfied by electronic signatures, notarizations, documents, communications, disclosures, deliveries, etc., as described above. The list is not intended to be an exclusive list and is intended to be modified to reflect the adopting state’s laws.

Laws That Prohibit or Limit Insurers and Producers from Implementing or Using Newer Technologies

The Innovation Task Force also asked for comments relating to other laws, regulations, or regulatory guidances that prohibit or limit insurers or producers from implementing newer technologies necessary to continue to serve customers and maintain operations. We note that the federal Electronic Signatures in Global and National Commerce Act (E-Sign), and the NCCUSL UETA and state UETA's, that generally track the federal law, require an opt-in as a prerequisite to engaging in e-commerce with a consumer. The federal E-Sign and UETA also requires that a consumer consent electronically or demonstrate his or her ability to consent or retain records electronically. Many of the state insurance specific e-delivery laws also include a similar opt-in requirement.

These opt-in and related requirements, coupled with other outdated regulatory requirements described above, jeopardize life insurers' ability to take advantage of transformative changes in online technologies, noted above, and consumers' use and expectation of insurers' and other financial institutions' use of these technologies, to serve consumers in the fastest, safest and most effective manner possible.

Conclusion

Federal regulators, including the Department of Labor and the Securities and Exchange Commission (SEC), also provided accommodations during the pandemic, and are engaged in ongoing regulatory modernization efforts. In furtherance of these efforts, in late October, ACLI and the Committee of Annuity Insurers submitted a white paper to the SEC with insurance-specific recommendations for ways to modernize e-delivery of documents.

ACLI believes that our transition to a touchless society has accelerated consumers' and business' use and acceptance of electronic commerce and electronic delivery of all forms of documents. ACLI believes it is time for the state and federal regulatory communities to create paradigms that treat paper and electronic documents as being equal; today the paradigms consider paper to be "normal" and create exceptions for electronic documents. That is simply inconsistent with technology and consumer preferences.

ACLI looks forward to working with the NAIC to help modernize outdated regulatory requirements that have adversely impacted life insurers' businesses and made their interactions with consumers less efficient and effective.

Most immediately, we encourage the NAIC to adopt a model state insurance department e-commerce bulletin(s) to most expeditiously make permanent key temporary accommodations offered by the state regulatory community during the pandemic and to provide necessary clarity and uniformity with respect to state law applicable to life insurers' ability to engage in e-commerce,

Again, we thank you for the opportunity to submit these comments and would be glad to answer questions relating to any of the above.

Sincerely,



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INSURANCE DEPARTMENT BULLETIN/ORDER

ELECTRONIC TRANSACTIONS & COMMUNICATIONS IN CONDUCT OF THE BUSINESS OF INSURANCE REMOTE EXAMINATIONS OF AND BY INSURANCE COMPANIES ELECTRONIC INSTRUCTION OF INSURANCE AGENTS

Various provisions of the [insert name of state] insurance code require: (a) signatures, documents, records, communications, or activities related to insurance transactions to be in written/tangible form or performed in person; (b) examinations or investigations of or by insurance companies to be performed on site; and (c) insurance agents' pre-licensing or continuing education instruction to be in person or in a classroom. Often these provisions do not expressly permit or otherwise contemplate electronic signatures, documents, communications, disclosures, or transactions in connection with the conduct of the business of insurance, remote examinations of or by insurance companies, or electronic or online instruction of insurance agents.

The recent COVID-19 pandemic and associated "shelter in place" orders have highlighted certain outdated regulatory requirements as regulators, insurers and consumers navigate and adapt to this new environment. Now, more than ever, the insurance industry has a critical need to engage in electronic communications and transactions to conduct the business of insurance and serve consumers effectively and efficiently. Navigation of the pandemic also has demonstrated the benefits of remote examinations of and by insurance companies under certain circumstances and of electronic or online instruction for insurance agents seeking to meet pre-licensing and continuing education requirements.

[Insert title and citation to state UETA or similar law] expressly allows regulated entities to conduct business with consenting consumers electronically and provides for legal recognition of electronic signatures, records, and transactions. The provisions of [insert title of state UETA or similar law] apply to electronic insurance documents and transactions, the electronic creation of insurance contracts, and the transmission of insurance notices or disclosures in this state unless [insert reference to state UETA or similar law] or other law of this state expressly provides otherwise.

Various provisions of the [insert name of state] insurance code both grant the Commissioner authority to and set the parameters for the conduct of financial and market conduct examinations and investigations of insurance companies. These various provisions also require insurance companies to perform examinations of certain third-party administrators.

[Insert citation to appropriate provisions of state insurance code] require insurance agents to meet certain pre-licensing and continuing education requirements.

The purposes of this Bulletin/Order are to:

1. clarify that the requirements of any [insert name of state] insurance statute, regulation, or guidance that a signature, document, communication, disclosure, delivery or transaction, relating to the conduct of the business of insurance, be in written/tangible form or performed in person are satisfied by a signature, document, communication, disclosure, delivery or transaction that is in electronic form or performed electronically, consistent with the requirements of [insert reference to

state UETA or similar law], unless the statute, regulation or guidance expressly prohibits such electronic signature, document, communication, disclosure, delivery or transaction;

2. clarify the requirements for electronic delivery of documents in connection with insurance transactions;

3. provide guidance for insurers, producers, and other regulated insurance entities regarding other issues related to the electronic transaction of the business of insurance and provision of insurance products and services to consumers;

4. permit remote examinations of and by insurance companies to meet examination and investigation requirements; and

5. permit/clarify that insurance agents may meet pre-licensing and continuing education requirements via electronic/online instruction.

ELECTRONIC SIGNATURES, DOCUMENTS, COMMUNICATIONS, & DELIVERY

Any insurance statute, regulation or guidance of this state, including the statutory provisions listed in Appendix A, that requires a signature, document, communication, disclosure, or delivery to be in written/tangible form or to be performed in person is satisfied by a signature, document, communication, disclosure, or delivery that is in electronic form or performed electronically, consistent with the requirements of [insert reference to state UETA or similar law], unless the statute, regulation or guidance expressly provides otherwise.

Nothing in this Bulletin/Order requires a regulated party, insured, consumer or third party to conduct insurance transactions electronically.

A consumer retains full rights to accept certain transactions by electronic means and refuse other transactions by electronic means.

Electronic transactions and communications are subject to the record keeping requirements of the [insert name of state] insurance code and regulations.

Insurance transactions, records, and communications may be retained in electronic form.

ADDITIONAL CLARIFICATION RELATING TO ELECTRONIC DELIVERY

[Insert citations to appropriate sections of state UETA] do not list all the commonly used methods of electronic communication in its broad definitions of 'electronic record' and 'electronic signature'. These common methods include insurance records created, generated, sent, communicated, received or stored by electronic means, including email, voice signature, and web or Internet based submissions or communications between insurers and consumers, insurance agents and regulated insurance entities.

Delivery of an insurance document in accordance with this Bulletin/Order shall be considered the equivalent to any delivery method required under applicable law, including delivery by first class mail; first class mail, postage prepaid; certified mail; certificate of mail; or certificate of mailing.

Unless expressly provided otherwise in relevant insurance law of this state, any notice or other document required in an insurance transaction may be delivered, stored, or presented by electronic

means so long as the delivery, storage or presentation meets the requirements of [insert reference to state UETA].

The burden is on the regulated insurance entity to meet all existing requirements for delivery regardless of the method by which the policy or other record(s) are delivered to the recipient.

Any policy, other record or communication delivered to a person must be maintained by the regulated insurance entity in accordance with applicable retention schedules and the regulated entity must be able, within applicable timeframes and as prescribed by the relevant law or regulation, to provide an easily readable electronic or paper copy of the policy or document.

If an applicable insurance law or regulation requires a record, notice, or document to be attached to or enclosed with other records, documents, or notices, the law or regulation can be satisfied electronically so long as it is clear that the attached or enclosed record, document, or notice is logically associated with or linked to the same electronic record as the principal record, document, or notice.

ORAL COMMUNICATION

Except as otherwise expressly provided by law, if an oral communication or a recording of an oral communication received from a party can be reliably stored and reproduced by an insurer, the oral communication or recording qualifies as a notice or document delivered electronically.

NOTARIZATION & ATTESTATION

In line with [insert citation to appropriate section of state UETA], if a provision of any law or regulation of this state requires a signature, notice or document to be notarized, acknowledged, verified, or made under oath, the requirement is satisfied if the electronic signature of the person authorized to perform those acts, together with all other information required to be included by the provision, is attached to or logically associated with the signature, notice, or document.

Remote electronic notarization (RON), conducted remotely over the internet using digital tools and live audio-video technologies, is permitted to be used in lieu of an electronic signature or notarization provided all requirements for notarization, other than any physical presence requirements, are met.

CLARIFICATION REGARDING JURISDICTION AND LICENSING, ADVERTISING, FORMAT, RECORD RETENTION, AND PRIVACY RELATED TO THE ELECTRONIC TRANSACTION OF THE BUSINESS OF INSURANCE

JURISDICTION AND LICENSING

The Department does not consider the mere maintenance or availability of a web site that contains insurance content, where the site owner has done nothing through such web site to purposely avail himself of the benefits of doing insurance business in this state, to alone constitute 'doing business.' Operating a web site, regardless of whether compensation is received, that includes insurance advertising does not constitute the transaction of insurance, provided that the operator does not otherwise solicit, sell or negotiate insurance. The Department will not assert jurisdiction over a web site in cases where consumers who visit the site are provided reasonable access to information indicating that the advertised products and services are not available in all states.

ADVERTISING

Subject to the above policy on jurisdiction, advertising on a web site is generally subject to the same rules as advertising in other media. For example, if changes in the content of a web site are of the type that would require re-approval of a print advertisement, then the web site changes require re-approval as well. Changes in the appearance of a website, with no changes in substantive content, would not generally require re-approval or separate recordkeeping.

FORMAT

As the graphical display presented on a consumer's monitor is, in large part, beyond the direct control of the regulated entity, the Department finds that specific format requirements, including fonts and paper size, originally established for printed documents are satisfied for electronically transmitted or displayed records by using characteristics that are designed to meet the same regulatory objective. For example, a requirement to use a specific color or font can be met so long as it has the same emphasis or distinguishing percentage proportions for the characters relative to the rest of the document.

RECORD RETENTION

Unless specifically required otherwise, electronic recordkeeping is generally subject to the same timelines and other standards as recordkeeping in other media. In [insert name of state], a regulated entity is in compliance with the state's recordkeeping requirements if it can reassemble the original information upon request. In cases where there is no paper document, a regulated entity shall be in compliance if it can produce the information or data that accurately represents the record of the information or data.

PRIVACY

[Insert title and appropriate citation to state insurance privacy laws relating to the confidentiality and security of consumers' personal information] and other applicable privacy laws are equally applicable to all media, including electronic media.

In line with statements above relating to electronic documents, communications and delivery, the requirements of any statute, regulation or guidance of this state for privacy notices and disclosures to be in written/tangible form are satisfied by a document, communication, disclosure or notice that is in electronic form or performed electronically, consistent with the requirements of [insert reference to state UETA] and the specific requirements of relevant state insurance privacy laws. The burden is on the regulated entity to meet all existing requirements of any statute, regulation or guidance of this state to protect the security, as well as the confidentiality, of any insurance privacy notice or other disclosure delivered in this state, regardless of the method by the privacy notices or other disclosure document is delivered.

Any privacy notice delivered to an individual in this state must be maintained by the regulated insurance entity in accordance with applicable retention schedules, and the regulated entity must be able, within applicable timeframes prescribed by relevant law, to provide an easily readable electronic or paper copy of the policy or document to the Department or other party entitled to the information on request.

REMOTE FINANCIAL AND MARKET CONDUCT EXAMINATIONS OF OR BY INSURANCE COMPANIES

The requirements of any statute or regulation of this state, including the statutory provision(s) listed below, that a financial or market conduct examination or other investigation of an insurance company be performed onsite, or that an insurance company conduct an onsite examination of certain third party administrators, may be satisfied by an examination or investigation that leverages existing, proven processes performed remotely by the Commissioner or his/her delegates, as applicable:

[INSERT INSURANCE CODE CITATIONS] directing the insurance commissioner to conduct of financial and market conduct examinations and investigations of insurance companies.

Waiver of On-Site Review Requirements

Pursuant to (insert reference to applicable state law based on Section 5(C) of the NAIC Managing General Agents Model Act (#225)) insurers are required to, at least semiannually, conduct an on-site review of the underwriting and claims processing operations of a managing general agent.

Pursuant to (insert reference to applicable state law based on Section 7(H) of the NAIC Third Party Administrator Model Act (#1090)) insurers are required to, at least semiannually, conduct a review of the operations of its third-party administrator in cases where an administrator administers benefits for more than one hundred (100) certificate holders, subscribers, claimants, or policyholders on behalf of an insurer, and at least one such review must be conducted on site.

Insurers may conduct reviews of managing general agents or third-party administrators through electronic information to satisfy their on-site review obligations under (insert reference to applicable state law based on Section 5(C) of Model #225 and Section 7(H) of Model #1090).

AGENTS' PRE-LICENSING & CONTINUING EDUCATION REQUIREMENTS

The requirements of any statute or regulation of this state, including the statutory provision(s) listed below, that an insurance agent fulfill certain pre-licensing or continuing education requirements by classroom or in person instruction may be satisfied by electronic or online instruction that otherwise meets the specified pre-licensing and continuing education requirements:

[INSERT INSURANCE CODE CITATION] imposing prospective insurance agents' pre-licensing requirements

[INSERT INSURANCE CODE CITATION] imposing insurance agents' continuing education requirements

APPENDIX A

COMMUNICATIONS BETWEEN AN INSURER OR PRODUCER AND CONSUMERS

- [INSERT STATE INSURANCE CODE CITATION] - Delivery of policies and contracts
- [INSERT STATE INSURANCE CODE CITATION] - Delivery of notices and disclosures related to insurance.
- [INSERT STATE INSURANCE CODE CITATION] - Delivery of privacy notices related to insurance
- [INSERT STATE INSURANCE CODE CITATION] - Evidence of insurance.
- [INSERT STATE INSURANCE CODE CITATION] - Complaints.
- [INSERT STATE INSURANCE CODE CITATION] - Surplus lines broker's notice to insured.
- [INSERT STATE INSURANCE CODE CITATION] - Health discount plans.
- [INSERT STATE INSURANCE CODE CITATION] - Disclosures and notices related to portable electronic devices insurance.
- [INSERT STATE INSURANCE CODE CITATION] - Assignment of policies.
- [INSERT STATE INSURANCE CODE CITATION] - Consumer request for copy of application, alteration
- [INSERT STATE INSURANCE CODE CITATION] - Minor may give acquittance.
- [INSERT STATE INSURANCE CODE CITATION] - Forms for proof of loss to be furnished.
- [INSERT STATE INSURANCE CODE CITATION] - Notice of long-term care benefits denial.
- [INSERT STATE INSURANCE CODE CITATION] - Disclosures, notices and other communication regarding long-term care benefits.
- [INSERT STATE INSURANCE CODE CITATION] - Notice of election by attorney in fact.
- [INSERT STATE INSURANCE CODE CITATION] - Consumer information notice for multiple employer welfare association.
- [INSERT STATE INSURANCE CODE CITATION] - Applications for insurance in formation of mutual insurer.
- [INSERT STATE INSURANCE CODE CITATION] - Reciprocal insurer authority of attorney-in-fact.
- [INSERT STATE INSURANCE CODE CITATION] - Forms for customer service requests

INSURERS' & PRODUCERS' COMMUNICATIONS WITH THE DEPARTMENT OF INSURANCE

- [INSERT STATE INSURANCE CODE CITATION] - Certificate of Compliance
- [INSERT STATE INSURANCE CODE CITATION] – Reinsurance Attestation
- [INSERT STATE INSURANCE CODE CITATION] – Certificate of Investment in PR securities
- [INSERT STATE INSURANCE CODE CITATION] – Schedule of Excess Risks
- [INSERT STATE INSURANCE CODE CITATION] – Officer Filing (president authorizing specific officers to certify that reporting is accurate)
- [INSERT STATE INSURANCE CODE CITATION] – Officers and Directors Insurance Coverage
- [INSERT STATE INSURANCE CODE CITATION] – Certificate of Authority Renewal
- [INSERT STATE INSURANCE CODE CITATION] – Ordinary and Extraordinary Dividend
- [INSERT STATE INSURANCE CODE CITATION] – Concentration of Risk
- [INSERT STATE INSURANCE CODE CITATION] – Surplus Note
- [INSERT STATE INSURANCE CODE CITATION] – Application for Certificate of Authority
- [INSERT STATE INSURANCE CODE CITATION] – UCAA Filing
- [INSERT STATE INSURANCE CODE CITATION] – Registration Statement
- [INSERT STATE INSURANCE CODE CITATION] – Application required, life and health insurance
- [INSERT STATE INSURANCE CODE CITATION] - Filing and approval of forms.
- [INSERT STATE INSURANCE CODE CITATION] – Form filing, subject to prior approval
- [INSERT STATE INSURANCE CODE CITATION] – Form filing, subject to file and use; penalties
- [INSERT STATE INSURANCE CODE CITATION] - Application to the director for a hearing on a disapproved filing.
- [INSERT STATE INSURANCE CODE CITATION] - Application to the director to file a deviation.
- [INSERT STATE INSURANCE CODE CITATION] - Rate filings, supplementary rate information, supporting information, application to director to make rate effective before expiry of waiting period, and application to director to extend to time to provide information.
- [INSERT STATE INSURANCE CODE CITATION] - Demand for hearing.
- [INSERT STATE INSURANCE CODE CITATION] - Application for certificate of authority.

- [INSERT STATE INSURANCE CODE CITATION] - Application for voluntary surrender of certificate.
- [INSERT STATE INSURANCE CODE CITATION] - Statement of actuarial opinion and supporting documents.
- [INSERT [STATE INSURANCE CODE CITATION] - Insurer's required notice of change to the division.
- [INSERT STATE INSURANCE CODE CITATION] - Biographical affidavits.
- [INSERT STATE INSURANCE CODE CITATION] - Risk based capital reports.
- [INSERT STATE INSURANCE CODE CITATION] – Quarterly and annual statutory financial statements, whether audited or unaudited.
- [INSERT STATE INSURANCE CODE CITATION] –Statutory management discussion and analysis reports
- [INSERT STATE INSURANCE CODE CITATION] - Risk based capital report for foreign insurers.
- [INSERT STATE INSURANCE CODE CITATION] - Consent of insurer to release of report.
- [INSERT STATE INSURANCE CODE CITATION] - Written explanation of failure to file report by due date.
- [INSERT STATE INSURANCE CODE CITATION] – Statement regarding the acquisition of control of or merger with a domestic insurer on Form A (or any comparable form)
- [INSERT STATE INSURANCE CODE CITATION] - Registration of insurers who are members of an insurance holding company system and disclaimer of affiliation on Form B (or any comparable form).
- [INSERT STATE INSURANCE CODE CITATION] – Prior notice of an affiliate transaction on Form D (or any comparable form)
- [INSERT STATE INSURANCE CODE CITATION] – Pre-acquisition notification form regarding the potential competitive impact of a proposed merger or acquisition by a non-domiciliary insurer doing business in this state or by a domestic insurer on Form E (or any comparable form)
- [INSERT STATE INSURANCE CODE CITATION] – Enterprise risk report on Form F (or any comparable form)
- [INSERT STATE INSURANCE CODE CITATION] – Own risk and solvency assessment reports, or similar reports
- [INSERT STATE INSURANCE CODE CITATION] – Corporate governance annual disclosure reports, or similar reports
- [INSERT STATE INSURANCE CODE CITATION] - Written consent to public release of confidential information.

- [INSERT STATE INSURANCE CODE CITATION] - Notice to director by domestic insurer of assignment of assets.
- [INSERT STATE INSURANCE CODE CITATION] - Licensee's required notice of change to the division.
- [INSERT STATE INSURANCE CODE CITATION] - Termination of appointment.
- [INSERT STATE INSURANCE CODE CITATION] - Controlling insurance producers.
- [INSERT STATE INSURANCE CODE CITATION] - Acting as a managing general agent.
- [INSERT STATE INSURANCE CODE CITATION] - List of supervisors and current insurers for third-party administrators.
- [INSERT STATE INSURANCE CODE CITATION] - Third-party administrator contract.
- [INSERT STATE INSURANCE CODE CITATION] - License exceptions reinsurance intermediary broker.
- [INSERT STATE INSURANCE CODE CITATION] - Reinsurance intermediary manager contract.
- [INSERT STATE INSURANCE CODE CITATION] - Report to director of surplus lines insurance placement.
- [INSERT STATE INSURANCE CODE CITATION] - Report to director of placement of insurance with non-admitted insurer.
- [INSERT STATE INSURANCE CODE CITATION] - Surplus lines transaction report.
- [INSERT STATE INSURANCE CODE CITATION] - Insurer or licensee notice to the division of fraud.
- [INSERT STATE INSURANCE CODE CITATION] - Application to the director to authorize a filing to become effective before the waiting period has expired.
- [INSERT STATE INSURANCE CODE CITATION] - Actuarial certification to the director for small employer health insurance.
- [INSERT STATE INSURANCE CODE CITATION] - Application to the director for a hearing.
- [INSERT STATE INSURANCE CODE CITATION] - Trust agreement for formation of mutual.
- [INSERT STATE INSURANCE CODE CITATION] - Filing domestic mutual insurer reinsurance contract with director.
- [INSERT STATE INSURANCE CODE CITATION] - Notice of election by attorney in fact.
- [INSERT STATE INSURANCE CODE CITATION] - Joint insurance cooperative agreement
- [INSERT STATE INSURANCE CODE CITATION] - Examination of producers, adjusters &

promoters

- [INSERT STATE INSURANCE CODE CITATION] – Examination reports
- [INSERT STATE INSURANCE CODE CITATION] - Certificate of Compliance / Certification of Compliance
- [INSERT STATE INSURANCE CODE CITATION] – Certificate of Investment in PR Securities

COMMUNICATIONS BETWEEN AN INSURER AND ITS PRODUCERS

- [INSERT STATE INSURANCE CODE CITATION] - Insurer's notice of suspension or revocation to agents and MGAs.
- [INSERT STATE INSURANCE CODE CITATION] - Termination of an appointment.
- [INSERT STATE INSURANCE CODE CITATION] - Controlling insurance producers.
- [INSERT STATE INSURANCE CODE CITATION] - Managing general agents.
- [INSERT STATE INSURANCE CODE CITATION] - Insurer's third-party administrator.
- [INSERT STATE INSURANCE CODE CITATION] - Reinsurance intermediary brokers.
- [INSERT STATE INSURANCE CODE CITATION] - Reinsurance intermediary manager contract.
- [INSERT STATE INSURANCE CODE CITATION] – Application for agent's contract and/or appointment.
- [INSERT STATE INSURANCE CODE CITATION] – Onboarding forms and agreements for appointed producers.