



**Comments from the Center for Economic Justice  
To the NAIC Market Conduct Exam Guidelines Working Group**

**Proposed Title SDRs**

**April 23, 2021**

General Comment

Why use a fixed field data reporting format? Why not require comma delimited reporting or some other format that permits flexible field length?

Sales

PolTyp should require the entry of the Policy Form identifier.

Simultaneous Issue would include at least 2 records. In addition, some transactions involve multiple loan policies. Need separate record for each policy, not just each transaction. Also need separate records for owner and loan policies within simultaneous issue because coverage amounts will vary.

Owner or Lender Policy – 1 if Owner, 2 if Lender

Simultaneous Issue – 1 if Yes, 2 if No;

PropType – Residential typically means 1-4 Family Residential, but unclear if this is needed if you have the Policy Form, which will indicate residential or commercial.

Closing Protection Letter – need Y/N plus a field for CPL fee

Arbitration Provision – need Y/N if included in the policy

Base Premium – segregate base premium from endorsement premium and other non-premium fees.

Endorsements – should identify endorsements used not just that there were endorsements – add ten fields for endorsement 1, endorsement 2, etc.

Endorsement Premium – enter premium charges associated with endorsements

Transaction type – suggest codes for purchase, refinance, other instead of separate y/n fields

Claims:

Same comments on PolTyp.

Add fields for Arbitration, similar to Litigation

Add field for reason codes for claim denials

Add field outcome of litigation

Add field for claim settlement expense

Add fields for litigation expense and arbitration expense (subset of settlement expense)

Change Y/N litigation question to data fields like: Date litigation initiated, Status of litigation (ongoing, settled, court verdict, appeal of verdict, court proceedings concluded), Date litigation concluded, Outcome of litigation (1 if insurer paid no more than pre-litigation offer, 2 if insurer paid more than pre-litigation offer)