



Commonwealth of Massachusetts

**Division of Insurance**

# 2019 Annual Report

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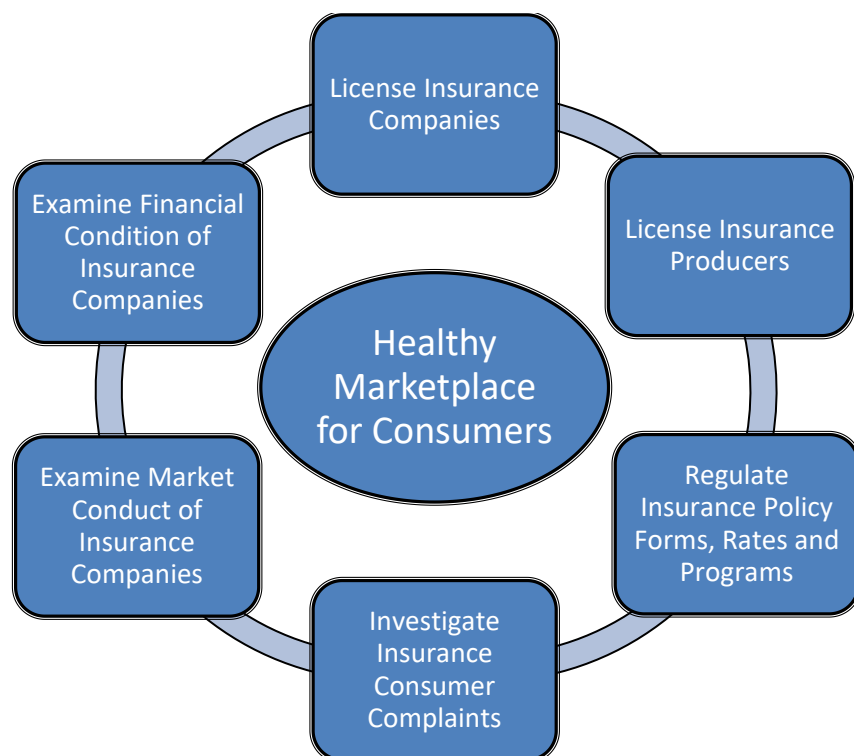
# 1 Division of Insurance

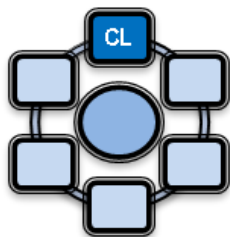
## 1.1 Mission

The Division of Insurance (“Division”) administers the Commonwealth’s insurance consumer protection laws through its regulation of the insurance industry. The Division’s primary mission is to monitor the solvency of its licensees in order to promote a healthy, responsive and willing marketplace for consumers who purchase insurance products. The Division licenses insurance companies and producers; reviews and approves policy rates and forms and coordinates the rehabilitation of financially troubled companies and the takeover and liquidation of insolvent insurance companies. The Division also investigates and responds to consumer inquiries and complaints, enforces state insurance laws and regulations and provides the public with accurate and unbiased information regarding various types of insurance coverage through its website and assorted publications. The Division safeguards consumer protection interests by providing consumers with accurate and unbiased information to enable them to make informed decisions, and intervenes on behalf of consumers who believe they have been victimized by unfair business practices.

## 1.2 Primary Activities

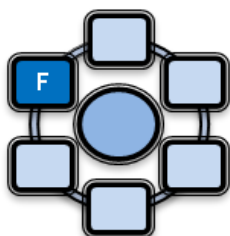
The Division protects consumers and promotes a fiscally sound insurance marketplace through the performance of six primary activities. Taken together, these activities represent the core of effective insurance regulation.





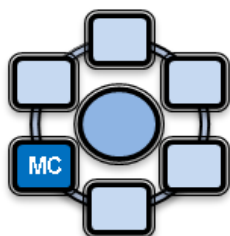
### **License Insurance Companies (CL)**

The process of licensing insurance companies promotes a marketplace of solvent, fiscally sound companies through the review and analysis of filings and financial statements.



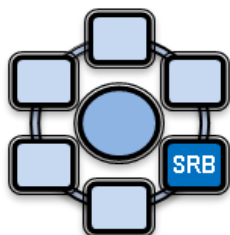
### **Examine the Financial Condition of Insurance Companies (F)**

The Division monitors the financial condition of insurance companies through quarterly financial analysis. The analysis process provides an early warning of possible financial problems, so that appropriate regulatory action can be taken before the extreme situation of insolvency occurs. The monitoring process also includes periodic on-site financial examinations of all domestic companies to value assets, determine liabilities and verify compliance with applicable statutes and regulations.



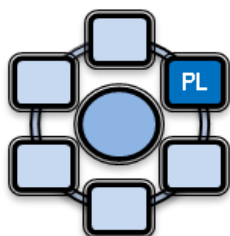
### **Examine the Market Conduct of Insurance Companies (MC)**

Beyond the financial health of an insurer, the Division also examines how the company interacts with policyholders and potential customers. The market conduct process looks beyond the financial condition of a company and examines business practices such as policy underwriting and rating, cancellations and non-renewals, claim settlements, original insurance applications and advertising materials. The goal of these examinations is to confirm that Massachusetts consumers are fairly treated in accordance with the terms of their insurance policy contract.



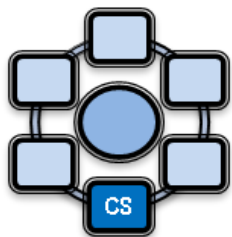
### **Regulate Insurance Policy Forms, Rates and Programs (SRB)**

By reviewing and approving insurance policy forms, rules, rates and associated program procedures and operations, the Division verifies that the insurance products sold to Massachusetts consumers by licensed insurance companies comply with the Commonwealth's laws and regulations.



### **License Insurance Producers and Others (PL)**

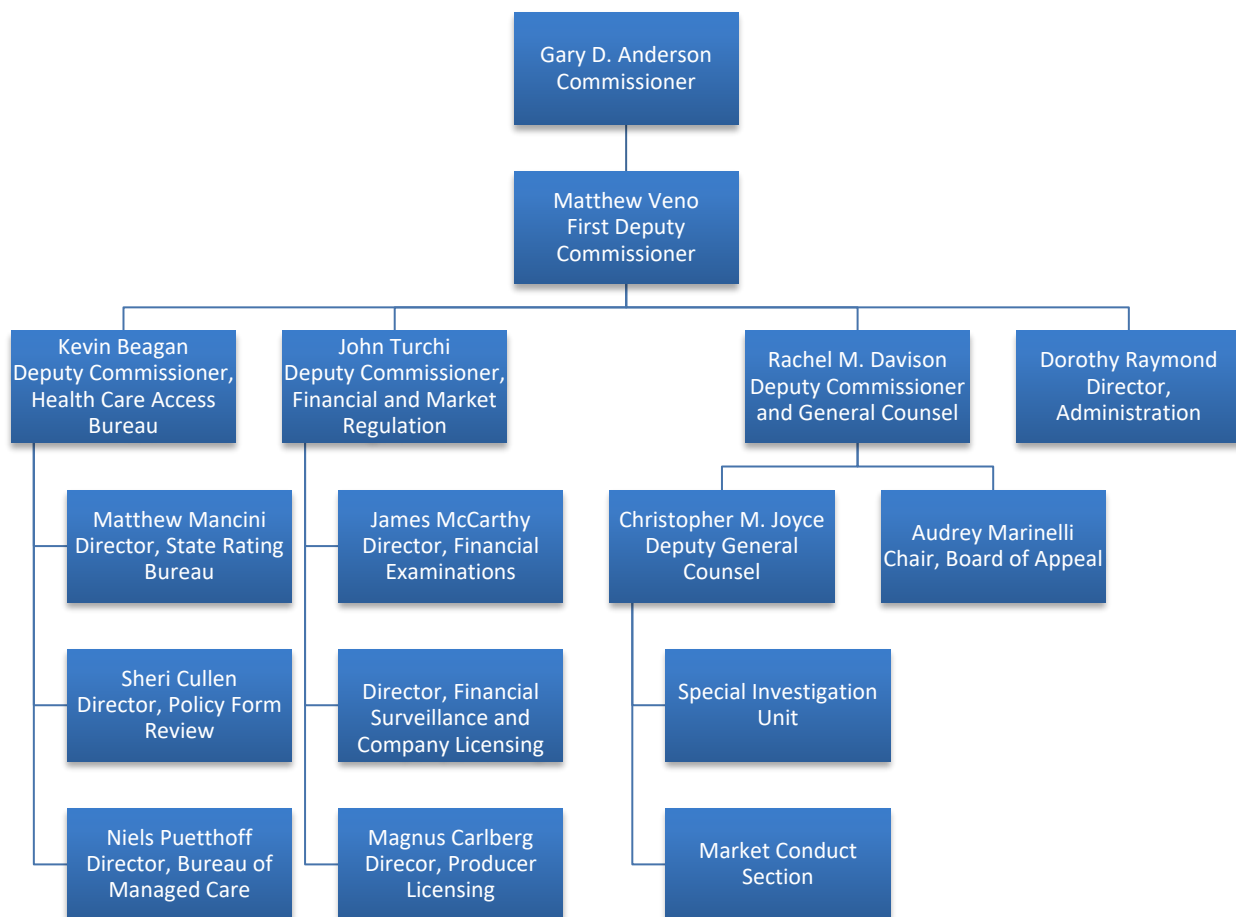
The process of licensing insurance producers and other key participants in the insurance industry allows the Division to promote a marketplace in which individuals and firms engaging in the business of insurance are qualified and are conducting business in compliance with the Commonwealth's laws and regulations.



## Investigate Insurance Consumer Complaints (CS)

The Division provides insurance consumers with a non-judicial alternative for pursuing complaints against insurance companies and insurance producers, by investigating consumer complaints within its jurisdiction and consistent with Massachusetts' laws.

### 1.3 Organizational Chart





## 1.4 Human Resources

The Administration Department works closely with the Human Resources Department in the Office of Consumer Affairs and Business Regulation on all aspects of hiring, managing, training and promoting the Division's workforce. In addition, the Administration Department works with the Division's Labor Relations Counsel to respond to various labor relations issues, including employee complaints and grievances. As of December 31, 2019, the Division employed the equivalent of 115.9 full time staff.

Division of Insurance  
Staffing Levels  
1979 -- 193  
2019 -- 116

## 1.5 Budget, Revenue & Assessments

### 1.5.1 Budget

The Division receives an annual budget appropriation from the Massachusetts Legislature to account 7006-0020, the value of which is then assessed back to the entities the Division regulates. The Division also has three trust accounts created by statute: the Worker's Compensation Rating Bureau Trust Account - 9222-7650; the State Rating Bureau Medical Malpractice Trust Account – 9222-7900; and the Medical Malpractice Analysis Bureau Trust Account – 9222-7500. These accounts are funded through direct assessments on the insurance industry.

### 1.5.2 Revenue & Assessments

The Division collects revenue from individual consumers, licensees and companies as part of its statutory responsibilities. The Division also bills various assessments to the insurance industry and collects these funds for deposit into the Commonwealth's General Fund. Most revenue collected from individuals and companies comes from license application and filing fees, as well as fines and penalties imposed for licensee violations of appropriate standards of conduct.

The Commissioner of Insurance ("Commissioner") is required by the Massachusetts General Laws to annually bill assessments to insurance companies for various purposes. In Fiscal Year 2019 (July 1, 2018 through June 30, 2019), the Division billed 12 assessments totaling over \$65 million. The revenue collected from these assessments funds the operation of a number of state agencies, including the Division of Insurance, the Registry of Motor Vehicle's Merit Rating Board, the Department of Fire Services and various fraud-prevention programs in the Attorney General's Office.

Taken together, this revenue and assessment collections are typically nine to ten times greater than the annual budget appropriation for the Division. In Fiscal Year 2019 (July 1, 2018 through June 30, 2019), the Division collected revenue in excess of \$186 million.

<b>Division of Insurance Budget for FY2019</b>	<b>\$13,517,980</b>
<b>Total Collections for the General Fund for FY2019</b>	<b>\$186,480,224</b>

## 1.6 The Massachusetts Insurance Marketplace

### 1.6.1 Massachusetts Domestic

Hundreds of insurance companies are licensed to do business in the Commonwealth of Massachusetts, and each year these companies write tens of billions of dollars in premium in Massachusetts. The Division licenses each of these companies and regulates all aspects of their business conduct. The Division is responsible for monitoring the solvency of companies domiciled in Massachusetts, which thereby protects the Commonwealth's citizens, as well as other policyholders across the nation and around the world.

In 2019, Massachusetts was the domicile state of:

- 47 property and casualty insurers;
- 16 life and accident and sickness insurers;
- 13 health organizations;
- 2 lodge fraternal benefit associations;
- 1 title insurer;
- 21 workers' compensation self-insured groups;
- 6 residual market pools; and;
- 144 fraternal benefit and mutual aid societies.

### 1.6.2 Company Market Share

Among the scores of insurance products marketed and sold in Massachusetts, certain lines of insurance represent the majority of premium and policies. Premium written under accident and health, homeowners, life, automobile, and workers' compensation policies make up approximately 33% of all premium written in the Commonwealth. Most lines of insurance operate within diverse markets comprised of insurers domiciled in Massachusetts, and those domiciled in other states but licensed to write business in Massachusetts. Consumers may choose from among many companies competing for their business. In 2019, Massachusetts was the principal regulator for 79 insurance companies and 171 related organizations.

## **TOP 10 COMPANIES OF SELECTED MARKET SECTORS**

### **Top 10 Accident & Health Insurance Companies\***

UNITEDHEALTHCARE INS CO	35.48%
CIGNA HLTH & LIFE INS CO	8.57%
AETNA LIFE INS CO	7.78%
METROPOLITAN LIFE INS CO	6.06%
UNUM LIFE INS CO OF AMER	4.57%
GUARDIAN LIFE INS CO OF AMER	2.40%
US BR SUN LIFE ASSUR CO OF CANADA	2.37%
GENWORTH LIFE INS CO	1.82%
LINCOLN LIFE ASSUR CO OF BOSTON	1.79%
AMERICAN FAMILY LIFE ASSUR CO OF COL	1.54%

\* Most health insurance is offered through Health Maintenance Organizations (“HMOs”). For HMO market share data, see Appendix C.

### **Top 10 Home Insurance Companies**

CITATION INS CO	8.34%
ARBELLA MUT INS CO	5.09%
COMMERCE INS CO	4.88%
SAFETY IND INS CO	4.20%
AMICA MUT INS CO	4.18%
MERRIMACK MUT FIRE INS CO	3.90%
VERMONT MUT INS CO	3.63%
LIBERTY MUT FIRE INS CO	2.96%
LM GEN INS CO	2.65%
NARRAGANSETT BAY INS CO	2.33%

### **Top 10 Life Insurance Companies**

LINCOLN NATL LIFE INS CO	9.70%
NORTHWESTERN MUT LIFE INS CO	7.40%
NEW YORK LIFE INS CO	5.98%
MASSACHUSETTS MUT LIFE INS CO	5.79%
METROPOLITAN LIFE INS CO	5.28%
JOHN HANCOCK LIFE INS CO USA	4.34%
GUARDIAN LIFE INS CO OF AMER	4.06%
THE SAVINGS BANK MUT LIFE INS CO	3.53%
PRUCO LIFE INS CO	3.12%
PRUDENTIAL INS CO OF AMER	2.74%

### **Top 10 Auto Insurance Companies**

COMMERCE INS CO	22.00%
GOVERNMENT EMPLOYEES INS CO	10.31%
SAFETY INS CO	8.08%
ARBELLA MUT INS CO	7.51%
PLYMOUTH ROCK ASSUR CORP	6.40%
LM GEN INS CO	4.99%
LIBERTY MUT INS CO	4.63%
PROGRESSIVE DIRECT INS CO	4.31%
GEICO GEN INS CO	3.66%
METROPOLITAN PROP & CAS INS CO	3.42%

### **Top 10 Workers' Compensation Insurance Companies**

ASSOCIATED INDUSTRIES OF MA MUT INS	7.46%
NEW HAMPSHIRE INS CO	5.71%
ACE AMER INS CO	4.56%
TRAVELERS IND CO OF CT	3.90%
ASSOCIATED EMPLOYERS INS CO	2.99%
TRAVELERS IND CO OF AMER	2.99%
ATLANTIC CHARTER INS CO	2.65%
HARTFORD UNDERWRITERS INS CO	2.63%
AMGUARD INS CO	2.49%
AMERICAN ZURICH INS CO	2.43%

### **Top 10 Total Property & Casualty Insurance Companies**

COMMERCE INS CO	9.93%
SAFETY INS CO	4.19%
GOVERNMENT EMPLOYEES INS CO	3.81%
ARBELLA MUT INS CO	3.72%
LIBERTY MUT INS CO	2.40%
PLYMOUTH ROCK ASSUR CORP	2.38%
LM GEN INS CO	2.28%
AMICA MUT INS CO	1.82%
METROPOLITAN PROP & CAS INS CO	1.71%
FEDERAL INS CO	1.65%

## **2 Financial Surveillance & Company Licensing**

### **2.1 Mission**

The primary mission of the Financial Surveillance and Company Licensing Section is to monitor the financial solvency of Massachusetts domestic insurers in order to ensure a healthy and competitive insurance market in the Commonwealth.

### **2.2 2019 Goals**

- Monitor the solvency of all insurance companies domiciled in Massachusetts. Complete quarterly and annual analyses of all files within the deadlines delineated in the NAIC Accreditation Guidelines. Hold annual meetings with senior company management, which could include members of audit committees and boards of directors.

- Maintain Accreditation by the NAIC. The NAIC Accreditation program provides a process whereby solvency regulation of multi-state insurance companies can be enhanced and adequately monitored with an emphasis on: adequate solvency laws and regulations to protect consumers as well as to guarantee funds, effective and efficient financial analysis and examination processes, and appropriate organizational and personnel practices.
- Process license applications - including license amendment applications - from insurance companies seeking to engage in insurance business in the Commonwealth in order to provide for a solvent and competitive insurance market.
- Oversee insurance company transactions and practices such as demutualizations, issuance of surplus notes, surplus note interest and principal payments, ordinary and extraordinary dividend requests, mergers and acquisitions, mutual affiliations, quasi-reorganizations, additional reserving requirements, corporate governance practices, and the creation of new Massachusetts domestic insurers.

## **2.3 Primary Activities**

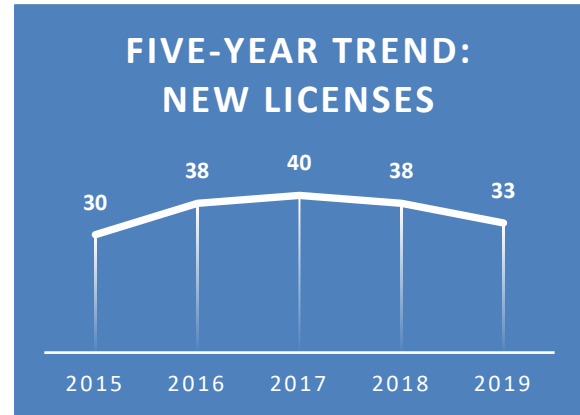
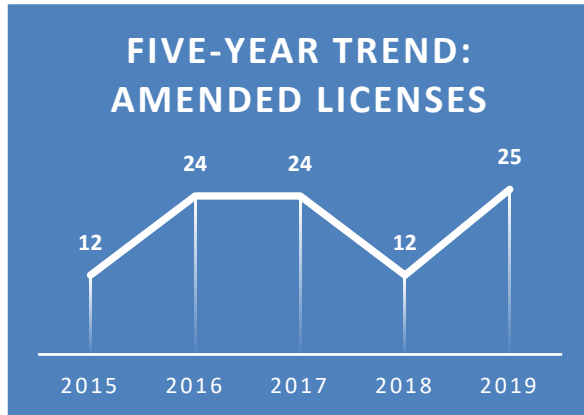
The Financial Surveillance and Company Licensing staff analyzes company annual statement findings, processes license certifications and manages the collection of related revenue, which totaled approximately \$658,000 in Fiscal Year 2019.

## **2.4 Financial Surveillance**

The Financial Surveillance Section monitors the solvency of domestic and foreign (domiciled in another state) insurance companies. There are currently 1,808 insurance companies licensed, authorized, or eligible to transact insurance business in the Commonwealth. Included in this number are:

- Life insurers
- Accident and health insurers
- Property and casualty insurers
- Health maintenance organizations
- Non-profit hospital and medical service corporations
- Dental service plans
- Vision service plans
- Fraternal benefit societies
- Title insurers
- Risk retention groups
- Self-insurance groups
- Surplus lines insurers
- Eligible Alien Unauthorized Insurers
- Reinsurers
- Service contract providers, and
- Life settlement companies.

As of December 31, 2019, there were 79 insurance companies domiciled in Massachusetts. Of the 79 Massachusetts domestic insurers, there were 47 property and casualty insurers, 16 life insurers, 13 health insurers, 2 fraternal benefit societies and 1 title insurer. These insurers wrote gross premiums of approximately \$67 billion during 2019.



In 2019, a Division financial analyst completed a comprehensive desk audit of each of these Massachusetts' domestic companies that was reviewed by a manager. These desk audits consist of over 20 detailed analyses for each company, including an in-depth review of the Annual Statement and their investment and reinsurance portfolios, reserving analysis, income and cash flow statements and balance sheets. The Division reviews the Statement of Actuarial Opinion, the Management's Discussion and Analysis, holding company filings, and independent CPA Audit in great detail. Lastly, Division staff and managers review each domestic insurer's quarterly statement, which is similar to the Annual Statement, and tracks each domestic insurer's national ratings. Each of these tasks helps the Division to closely monitor the solvency of each company

## 2.5 Company Licensing

The Company Licensing staff reviews and processes all applications from insurers seeking to obtain or amend licenses to transact insurance business in the Commonwealth. The Division participates in the NAIC Uniform Certificate of Authority Application ("UCAA") process. The UCAA process consists of 14 parts, which allow the Division to review the applicant's solvency, management team and experience in the insurance industry. Information compiled by the NAIC, as well as input from the domestic regulators, also has a part in the review process.

In 2019, the Company Licensing Section:

- Issued twenty-five new insurance company licenses and twenty-five amended insurance company licenses;
- Approved five companies as eligible to accept surplus lines placements;
- Approved one company as an accredited reinsurer; and
- Issued Certificates of Authority to two home service contract providers.

In addition, twelve companies became eligible alien unauthorized insurers.

## **NEW LICENSES, AUTHORITY OR ELIGIBILITY**

### **Accredited Reinsurers**

MAPFRE Re Vermont Corporation

### **Surplus Lines**

Ascot Specialty Insurance Company  
Ategrity Specialty Insurance Company  
Housing Specialty Insurance Company  
MSIG Specialty Insurance USA Inc. F/K/A Aioi Nissay Down Ins Co. of America  
Oklahoma Specialty Insurance Company

### **Eligible Alien Unauthorized Insurers**

Cigna Global Insurance Company Limited  
CNA Insurance Company (Europe) S.A.  
Convex Insurance UK Limited  
DAC Everest International Assurance, Ltd.  
Everest Insurance (Ireland)  
Lloyd's Syndicate #1947  
Mapfre España, Compañía de Seguros y Reaseguros, S.A.  
Markel Insurance S.E.  
QBE Europe SA/NV  
QBE Europe SA/NV  
RenaissanceRe Specialty U.S. Ltd.  
SI Insurance (Europe) S.A.

### **Life, Accident & Health Insurers**

Guaranty Income Life Insurance Company  
LifeSecure Insurance Company  
Patriot Life Insurance Company  
United Life Insurance Company  
UnitedHealthcare Insurance Company of Illinois

### **Home Service Contract Providers**

Securanty, Inc  
Sunnova Energy Corporation

### **Property & Casualty Insurers**

Aventus Insurance Company  
Blackboard Insurance Company (f/ka/ Hamilton Insurance Company)  
Clermont Insurance Company  
CM Select Insurance Company  
Insurance Company of the South  
ISMIE Mutual Insurance Company  
Lemonade Insurance Company

Manufacturers Alliance Insurance Company  
Mid-Continent Assurance Company  
Mid-Continent Casualty Company  
National American Insurance Company  
Nationwide Assurance Company  
Nationwide General Insurance Company  
Partner Reinsurance Company of the U.S.  
Pennsylvania Manufacturers Indemnity Company  
SFM Mutual Insurance Company  
Vault Reciprocal Exchange  
Medical Mutual Insurance Company of NC  
CM Regent Insurance Company  
Utica National Insurance Company of Ohio

## 2.6 Notable Transactions

There were several changes to the composition of the Massachusetts domestic insurance market in 2019. These included the following:

### AllWays Health Partners, Inc.

- In January 2019, the Company changed its name from Neighborhood Health Plan, Inc. to AllWays Health Partners, Inc.
- In 2019 \$100 million of capital was returned to the parent company and was approved by the Division.

### Barnstable County Mutual Ins. Co.

- In January 2019, the Company completed the purchase of 100% of the assets of Friedline & Carter Adjustment, Inc. (an independent adjustment firm) and changed the subsidiary's name to Friedline & Carter Adjustment, LLC.

### Boston Medical Center Health Plan, Inc.

- The Company received \$123.6 million of paid in capital from its parent company in 2019.

### Bunker Hill Ins. Casualty Co.

- The Company received a \$2.4 million of paid in capital from its parent company, Bunker Hill Insurance Company.

### Bunker Hill Ins. Co.

- The Company received a \$6 million of paid in capital from its parent company, the Plymouth Rock Company Inc.



#### Bunker Hill Preferred Ins. Co.

- The Company received a \$2.7 million of paid in capital from its parent company, the Bunker Hill Insurance Company.

#### Bunker Hill Property Ins. Co.

- The Company received a \$2.7 million of paid in capital from its parent company, the Bunker Hill Insurance Company

#### Bunker Hill Security Ins. Co.

- The Company received a \$2.7 million of paid in capital from its parent company, the Bunker Hill Insurance Company.

#### CeltiCare Health Plan of Massachusetts, Inc.

- In 2019 the Company paid an \$8.0 million extraordinary dividend to its parent which was approved by the Division.

#### Commerce Ins. Co.

- On January 1, 2019 MAPFRE USA sold MAPFRE Insurance of New York ("MICNY") and the renewal rights for the state of New Jersey to Plymouth Rock Assurance Company.
- In July 2019, MAPFRE USA announced its intent to substantially exit commercial lines everywhere but Massachusetts, due to poor performance. This includes exiting its commercial lines of business in Arizona, California, Florida, and Pennsylvania, doing so through the non-renewal of policies.

#### Commonwealth Annuity & Life Ins. Co.

- In 2019 the Company received a \$100 million capital contribution from its parent company.
- On December 31, 2019, the Company entered into a coinsurance agreement with Guaranty Income Life Insurance Company ("GILICO") whereby it assumed \$620 million of universal life and variable universal deposits and \$594 million of fixed annuity deposits; the Company retroceded \$1.1 billion of a portion of the same reserves to an affiliate counterparty.
- On January 1, 2019, the Company entered into a coinsurance agreement with RiverSource Life Insurance Company ("RiverSource") whereby it assumed \$1.65 billion of fixed annuity deposits; the Company retroceded \$1.46 billion of a portion of the same reserves to an affiliate counterparty.
- On August 13, 2019, the Company entered into a coinsurance agreement with Massachusetts Mutual Life Insurance Company whereby it assumed payout group annuity deposits regularly; the assumed reserves totaled \$896 million for the year ended December 31, 2019 as a result of this agreement.

#### Fallon Health & Life Assurance Co.

- The Company received \$11.1 million of paid in capital from its parent company in 2019.

#### Harvard Pilgrim Health Care, Inc.

- The Company and Tufts Health Plan Inc. signed a definitive agreement to combine their organizations on August 14, 2019. The merger is currently under a Federal and State Regulator review process, and the Division has called a limited-scope examination to evaluate the proposed combination.
- Effective as of January 1, 2019, HPHC Holding Corporation (HPHC Holding), formerly a Massachusetts for-profit corporation and a holding company for for-profit investments and interests, merged with and into Health Plan Inc., which is the sole surviving entity. Prior to the merger, HPHC Holding did not conduct any business activity, and its only asset was MedWatch, LLC which was transferred to Health Plans Inc.
- Effective January 1, 2019, the Company began participating in the Maine Guaranteed Access Reinsurance Association, which provides reinsurance for a portion of the Company's Maine High-Risk individual health business.

#### Liberty Mutual Ins. Co.

- The Company acquired AmTrust Surety in 2019, with the deal for the US portion of the acquisition closing in May 2019 and the international portion closing in October 2019.
- In August 2019, the Company closed its Pembroke transaction, where it sold some of the business units it had obtained in its 2017 Ironshore transaction, including Lloyd's syndicates, Ironshore European operations, and Visionary (Dubai).
- In November 2019, the company entered into a third reinsurance transaction with National Indemnity Company (NICO) on a combined aggregate excess of loss agreement for certain U.S. business lines and National Insurance workers' compensation, commercial auto liability, and general liability excluding umbrella and warranty liabilities.

#### Liberty Mutual Personal Insurance Company

- Effective December 31, 2019, Liberty Mutual Personal Insurance Company redomesticated from Massachusetts to New Hampshire.

#### Massachusetts Mutual Life Ins. Co.

- On March 7, 2019, the Mass Mutual entered into a Contingent Capital Facility Agreement with an unaffiliated entity. Under the capital facility MassMutual has the right to issue up to \$800 million of surplus notes to a Trust in exchange for certain principal and interest strips of U.S Treasury Securities held by the Trust.
- On May 24, 2019, Invesco Ltd. and MassMutual announced today the successful completion of Invesco's acquisition of MassMutual asset management affiliate Openheimer Funds.

- On May 24, 2019, MassMutual's affiliate MM Asset Management Holdings (MMAHM), which is a wholly-owned subsidiary of MassMutual Holding Co. LLC (MMHLLC), sold its retail asset management affiliate, Oppenheimer Acquisition - Corp. to Invesco Ltd. MMAMH, and Oppenheimer employee shareholders received 81.8 million Invesco common shares and \$4.0 billion in perpetual non-cumulative preference shares with a fixed cash dividend rate of 5.9%. MMAMH also received a 15.7% common equity interest in post-transaction Invesco, in which it has customary minority rights, including appointment of a director to Invesco's board of directors.
- On July 9, 2019 the MassMutual launched HarborTech, which is a Hong Kong technology company focusing on software and business development for financial services firms in Asia.
- On October 11, 2019, Mass Mutual exchanged certain existing higher interest rate surplus notes for previously issued lower interest rate notes or new surplus notes.

#### Plymouth Rock Assurance Company

- The Company received a \$64 million of paid in capital from its parent company, the Plymouth Rock Company Inc.
- Effective January 1, 2019, Plymouth Rock Assurance Corporation purchased from ACIC Holding Co., Inc. all of the issued and outstanding shares of MAPFRE Insurance Company of New York, which was subsequently renamed Plymouth Rock Assurance Corporation of New York.

#### Tufts Associated HMO, Inc.

- In August 2019 Tufts Health Plan, Inc. issued a press release announcing the Tufts Health Plan, Inc. and Harvard Pilgrim Health Care had signed an agreement to combine/merge their nonprofit organizations.

#### Tufts Health Public Plans, Inc.

- In August 2019 Tufts Health Plan, Inc. issued a press release announcing the Tufts Health Plan, Inc. and Harvard Pilgrim Health Care had signed an agreement to combine/merge their nonprofit organizations.

#### Tufts Ins. Co.

- In August 2019 Tufts Health Plan, Inc. issued a press release announcing the Tufts Health Plan, Inc. and Harvard Pilgrim Health Care had signed an agreement to combine/merge their nonprofit organizations.
- In December 2019 Tufts Insurance Company submitted a request to pay a \$10.0 million extraordinary dividend, which was approved by the Division in February 2020.

## **3 Financial Examinations**

### **3.1 Mission**

The mission of the Financial Examination Section is to perform statutory examinations of Massachusetts domestic insurers in order to assure the financial health of these companies and thereby protect consumers purchasing insurance products.

### **3.2 2019 Goals**

- Conduct financial examinations of domestic insurance companies in order to ensure that policyholders' and claimants' rights are protected and fulfilled, and that insurance consumers can do business with financially solvent companies.
- Maintain Accreditation by the National Association of Insurance Commissioners (NAIC). Impose qualitative standards in the regulation of insurance. Ensure that our domestic insurance companies operate and provide insurance coverage to policyholders and consumers with the least amount of regulatory oversight and involvement from other U.S. jurisdictions, and thus with the least amount of cost to them.
- Conduct financial examinations in compliance with the NAIC Financial Condition Examiners Handbook to ensure for timely and regular examination reviews that are based on a substantive "risk-focused" exam approach toward proper allocation of examination resources within the financial operations of our domestic insurance companies.

### **3.3 Primary Activities**

#### **3.3.1 Financial Examinations**

The Division conducts financial examinations in accordance with standards established by the Financial Condition (E) Committee of the NAIC, the requirements of the NAIC Financial Condition Examiner's Handbook, the Division's own examination standards and Massachusetts' General Laws. The principal focus of an examination is the most recent calendar year's activity. However, transactions both prior and subsequent to the "as of" examination date are reviewed as deemed appropriate.

In addition to reviewing an insurer's financial condition, the examination also includes a review of the company's:

- Business Plans and Policies;
- Financial Condition;
- Corporate Governance;
- Corporate Records;
- Reinsurance Programs;
- Systems and Controls Environment;

- Current and Prospective Risks; and
- Disaster Recovery Plan.

In addition to this list, the review also includes other pertinent matters, so to provide a reasonable assurance that the company is in compliance with applicable laws, rules and regulations. The Division considers the concepts of materiality and risk in planning and conducting an examination and directs its examination efforts accordingly.

In 2019, the Financial Examination Section completed routine statutory examinations of thirty insuring organizations. These companies produced \$11.6 billion in premium nationwide - \$11.0 billion in Massachusetts.

The NAIC Financial Regulation Standards & Accreditation (F) Committee has a standard known as the “18 Month Rule.” This standard establishes a general rule that comprehensive financial examinations conducted by state insurance departments should be completed and reports issued within eighteen months of the “as of” date of the examination. Exceptions to this rule are permitted for reasonable justification, and an extension of up to twenty-two months is allowed before the state is required to roll the “as of” date of a re-initiated exam forward one year.

The Financial Examination Section conducted thirty full-scope financial examinations with an “as of” date of December 31, 2017. All of these examinations were completed by June 30, 2019, within the “18 Month Rule” timeframe noted above.

Twenty-four examinations were in progress at year’s end, representing approximately \$12.7 billion in premium nationwide - \$10.5 billion in Massachusetts.



#### 2019 Completed Examinations

Life, Accident & Health Insurers	1
Property & Casualty Ins.	8
Health Insurers	9
Residual Market	2
Self-Insured Groups	9
Fraternal Insurers	1

Examinations In Progress as of 12/31/2019			
	US Direct Premium	MA Direct Premium	Surplus
<b>Property &amp; Casualty Insurers</b>			
A.I.M. Mutual Insurance Company	103,620,000	95,874,000	257,820,000
Associated Employers Insurance Company	36,420,000	34,618,000	6,062,000
Massachusetts Employers Insurance Company	15,520,000	15,520,000	3,736,000
Commerce Insurance Company	1,565,650,000	1,539,170,000	556,045,000
Citation Insurance Company	230,043,000	230,043,000	65,923,000
Encompass Insurance Company of MA	(163,000)	(163,000)	6,096,000
Hingham Mutual Insurance Company	9,358,000	9,358,000	47,476,000
Danbury Insurance Company	1,613,000	1,613,000	7,667,000
Liberty Mutual Insurance Company	2,088,675,000	401,788,000	16,365,330,000
Liberty Mutual Mid-Atlantic Insurance Company	186,495,000	186,495,000	21,040,000
Liberty Mutual Personal Insurance Company	5,623,000	2,147,000	12,983,000
Montgomery Mutual Insurance Company	111,148,000	0	53,814,000
Medical Professional Mutual Insurance Company	72,511,000	72,511,000	1,586,637,000
Safety Insurance Company	659,595,000	637,403,000	646,820,000
Safety Property and Casualty Insurance Company	25,022,000	24,318,000	21,845,000
Safety Indemnity Insurance Company	159,058,000	152,136,000	66,885,000
<b>Health Insurers</b>			
Blue Cross Blue Shield of MA HMO Blue, Inc.	4,588,677,000	4,588,677,000	2,266,462,000
Blue Cross Blue Shield of Mass, Inc.	2,247,356,000	2,247,356,000	779,298,000
ConnectiCare of MA, Inc.	3,213,000	3,213,000	2,704,000
<b>Life, Accident &amp; Health Insurers</b>			
New England Life Insurance Company	181,248,000	13,723,000	210,637,000
The Paul Revere Life Insurance Company	14,199,000	443,000	181,328,000
Savings Bank Mutual Life Insurance Company of MA	351,764,000	155,685,000	201,799,000
<b>Self-Insurance Groups</b>			
Massachusetts Interlocal Insurance Association	85,862,000	85,862,000	125,853,000
Massachusetts Bay Self Insurance Group	3,185,000	3,185,000	1,418,000
<b>TOTALS</b>	<b>\$12,745,691,000</b>	<b>\$10,500,977,000</b>	<b>\$23,495,688,000</b>

Examination Reports Issued in 2019			
	US Direct Premium	MA Direct Premium	Surplus
<b>Property &amp; Casualty Insurers</b>			
Arrow Mutual Liability Insurance Company	6,258,000	5,757,000	30,428,000
Bunker Hill Insurance Casualty Company	8,472,000	8,471,000	6,389,000
Bunker Hill Insurance Company	47,104,000	36,481,000	34,641,000
Bunker Hill Preferred Insurance Company	1,515,000	1,515,000	5,894,000
Bunker Hill Property Insurance Company	1,653,000	1,653,000	5,894,000
Bunker Hill Security Insurance Company	1,849,000	1,849,000	5,894,000
Pilgrim Insurance Company	74,615,000	74,615,000	21,421,000
Plymouth Rock Assurance Corp.	370,232,000	335,353,000	222,536,000
<b>Health Insurers</b>			
Boston Medical Center Health Plan	1,620,771,000	1,282,119,000	233,237,000
Fallon Community Health Plan	1,242,326,000	1,242,326,000	163,119,000
Fallon Health and Life Assurance Company	28,726,000	28,726,000	6,463,000
Health New England, Inc.	899,905,000	895,486,000	83,924,000
HNE Insurance Company	664,000	664,000	5,009,000
Neighborhood Health Plan, Inc.	2,424,164,000	2,424,164,000	337,126,000
Tufts Associated HMO, Inc.	2,555,327,000	2,515,245,000	644,286,000
Tufts Health Public Plans, Inc.	1,830,683,000	1,825,826,000	247,330,000
Tufts Insurance Company	278,781,000	247,851,000	52,607,000
<b>Life, Accident &amp; Health Insurers</b>			
New England Life Insurance Company	232,706,000	23,809,000	482,528,000
<b>Self-Insured Groups</b>			
Associated Builders & Contractors MA Workers' Comp. Corp Self-Insurance Group	0	3,461,000	0
Automotive Industries Compensation Corp.	0	8,560,000	0
Heating Ventilation Air Conditioning Comp. Corp.	0	1,175,000	0
Independent Schools Compensation Corp.	0	9,516,000	0
Massachusetts McDonald Operators Comp. Group	0	1,934,000	0
Massachusetts High Technology Self-Insurance Group	0	919,000	0
New England Educators Compensation Association	0	8,609,000	0
Self-Insured Lumber Business Association, Inc.	0	3,890,000	0
School Transportation Association of MA Workers' Compensation Self-Insurance Group	0	3,813,000	0

<b>Residual Market</b>			
Massachusetts Medical Malpractice Reinsurance Plan	0	0	0
Workers Compensation Rating and Inspection Bureau	0	0	0
<b>Fraternal Insurers</b>			
Supreme Council of the Royal Arcanum	6,858,000	3,501,000	12,419,000
<b>TOTALS</b>	<b>\$11,632,609,000</b>	<b>\$10,997,288,000</b>	<b>\$2,601,387,000</b>

### **3.3.2 Other Insurance Entities**

In addition to examining traditional insurance companies, the Section also conducts periodic examinations of domestic self-insured groups, residual market pools and over 140 fraternal benefit and mutual aid societies.

### **3.3.3 Special Brokers Tax Collection**

The Financial Examination Section collects state taxes on the Excess and Surplus Lines business written by Special Brokers licensed in Massachusetts. Collections in calendar year 2019 for business written in calendar year 2018 totaled \$44.9 million on written premium of \$1.12 billion.

### **3.3.4 Life Company Certification and Valuation Fees Collection**

At the end of each calendar year, Division financial examiners are charged with compiling the actuarial valuations of insurance reserves of Massachusetts domiciled life insurance companies as described in the annual financial statements and the actuarial reserve exhibits. These valuations are reviewed in context with the actuarial opinions provided by the companies, including asset adequacy testing required on these reserves. The Division then issues a certification of the company's entire reserve liability. Under Massachusetts law, the companies are required to pay fees for the annual valuation process and for the certificates issued. Valuation and certification fees billed in 2019 amounted to \$481,000.

## **3.4 Special Activities**

### **3.4.1 Training & Professional Accomplishments**

Several Financial Examination Section managers attended the Society of Financial Examiner's annual Career Development Seminar (CDS) from July 21, 2019 thru July 24, 2019. The Society of Financial Examiners (SOFE) is a professional society made up of state insurance examiners throughout the United States and its territories. Through lectures, roundtable discussions and interactive formats, participants learn the latest developments, current and emerging issues, and new solutions in the regulation of insurance companies. Topics also include the risk-focused examination approach, fraud detection, IT development, and the latest legislation, auditing and regulatory issues.



## 4 Market Conduct

### 4.1 Mission

The primary mission of the Market Conduct Section is to ensure the fair treatment of policyholders in the Massachusetts insurance marketplace. This is accomplished through a number of processes, primary of which is to conduct comprehensive and limited scope examinations and market analysis reviews of insurance companies.

The Market Conduct Section investigates the manner in which insurance companies treat policyholders in order to ensure that such treatment is fair, and in compliance with the terms and conditions of insurance contracts, and complies with state laws, regulations and bulletins. Comprehensive examinations involve interviews of key company personnel and review of company records and practices, including those relating to company operations, sales, advertising, rating, underwriting, claims decisions, and complaint handling.

Based upon the results of the examination, the Division issues a report which includes observations and recommendations, and when necessary, findings and required actions to correct company procedures which adversely affect insurance consumers or do not comply with law. Significant findings may result in further administrative action and may lead to fines, payments to consumers or other benefits to policyholders.

The Market Conduct Section also conducts Market Analysis Reviews of various regulatory data covering select companies doing business in Massachusetts. Review of this regulatory data enables the Section to better understand the current state of the marketplace and to identify possible areas of regulatory intervention.

The Market Conduct Section also uses information provided by, and shares information with, the NAIC and actively participates in multi-state examinations.

### 4.2 2019 Goals

- Monitor insurers and industry trends, and analyze their impact on consumers and the insurance marketplace to determine whether regulatory intervention or oversight is appropriate.
- Monitor the progress of multi-state regulatory settlement agreements in which the Division is a lead state negotiator.
- Determine whether multi-state regulatory settlement agreements negotiated by other states are fair to Massachusetts consumers.
- Maintain a market conduct examination program in accordance with Division and NAIC guidelines.
- Conduct substantive market conduct examinations that are thoughtfully planned and timely executed by qualified and trained professionals.

## **4.3 Primary Activities**

### **4.3.1 Examinations and Reviews**

The market conduct examination process enables the Division to ensure that insurance companies treat policyholders and consumers fairly and in accordance with the terms of the insurance contract and state laws and regulations. Completed examinations can result in insurance companies taking corrective action to address identified violations and to prevent their recurrence.

In 2019, the Market Conduct Section completed comprehensive examinations of 3 domestic companies that evaluated the following business practices:

- Company operations and management,
- Timely and fair complaint handling,
- Marketing and sales practices,
- Appointment and licensing of producers,
- Underwriting and rating guidelines and practices, and
- Claims handling and settlement practices.

The Market Conduct Section completed comprehensive examinations of the following companies in 2019:

- Commonwealth Annuity and Life Insurance Company and First Allmerica Financial Life Insurance Company
- Encompass Insurance Company of Massachusetts

### **4.3.2 Market Analysis**

In 2019, the Market Conduct Section completed market analysis reviews on 62 companies for specific lines of business (homeowners, private passenger automobile, pet insurance, individual life, and individual annuity). Examiners conducted limited scope analysis examinations on 51 companies; 29 of the 51 also received an interrogatory seeking further clarification of numerical data or additional explanatory information. During market analysis reviews, the Division assesses data from various sources, including the Market Conduct Annual Statement; individual NAIC databases, including the Complaint Database, Regulatory Information Retrieval System; Examination Tracking System; and insurance company-submitted financial statements. The Market Conduct Section also reviews complaint files from the Division's Consumer Services Unit. These market analysis reviews provide an early warning mechanism used to identify company non-compliance with insurance laws and regulations and negative trends which may impact future claim payments.

### **4.3.3 Consumer Restitution**

The Market Conduct Section's examination and multi-state regulatory settlement agreement with UNUM Group detailing UNUM's improper claim handling practices, including denials and terminations of payments on group and individual disability income

policies, continued in 2019 to provide restitution to disabled Massachusetts claimants. As of December 31, 2019, over \$16.7 million has been paid or reserved for payment to future claimants.

## **5 Producer Licensing**

### **5.1 License Types**

The Producer Licensing Unit is responsible for issuing the following types of licenses:

- Producers
- Advisers
- Auto Clubs & Auto Club Agents
- Bank Insurance Licenses
- Life Settlement Brokers
- Motor Vehicle Damage Appraisers
- Portable Electronics Limited Lines Licenses
- Public Insurance Adjusters
- Reinsurances Intermediaries (brokers & managers)
- Surplus Lines Brokers

### **5.2 Mission**

The Producer Licensing Section licenses all individuals and business entities conducting the business of insurance in Massachusetts, ensuring that they are qualified and in good standing, and that they conduct business within the requirements of the Commonwealth's laws and regulations. This Section also ensures that all insurers who appoint licensed producers annually renew or non-renew their appointments. The Section approves all business names (including DBA names), processes all name and address changes, as well as license terminations and voluntary license surrenders, and issues certification letters, clearance letters and duplicate or replacement licenses. The Section ensures that all resident individual producer licensees, and all resident individual public insurance adjusters, adhere to the continuing education requirements for each license type. In addition, the Section responds to written inquiries from multiple sources and monitors and responds to two electronic mailboxes--one for producer questions and updates and one for appointment renewal questions--and handles approximately 2,500 phone calls per month.

### **5.3 Primary Activities**

#### **5.3.1 Enforcement of Continuing Education (CE) Requirements**

The Division has continued to enforce the CE law since it went into effect in 2014. As a result of this law, resident producers who are required to complete CE hours prior to their license renewal dates are not able to renew their licenses until they comply. Licensees are also required to complete 3 CE hours in a Massachusetts-approved

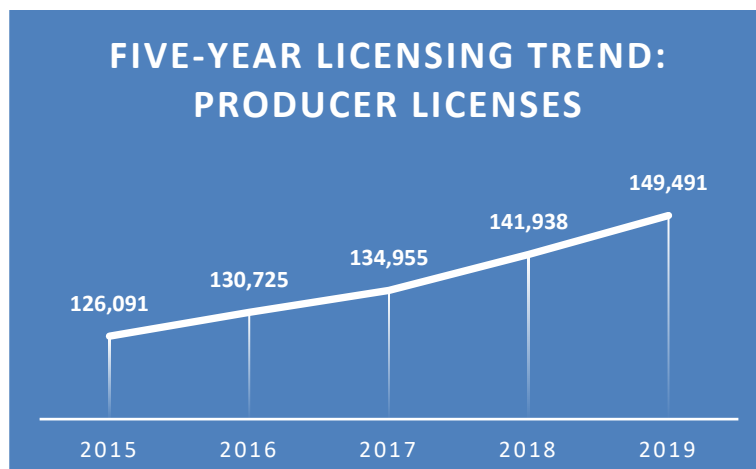
Ethics course. This Ethics course is not in addition to the required hours, but rather must be included in the total required hours. To be compliant, all producers must complete 60 CE hours for the first time renewal of their license, or 45 CE hours for every subsequent renewal.

The Division undertook a major project when it acted to prevent producers from renewing their license due to CE non-compliance. Licensees who are late in renewing their license are assessed a late renewal fee, and must pay a fine based upon the number of CE hours the licensee owed at renewal. In 2019, more than 392 licensed producers failed to comply with our CE requirements.

### 5.3.2 Prometric Exam Review Workshop

Several Division staff and insurance industry personnel participated as subject matter experts at the annual Prometric Exam Review Workshop, where they reviewed examination questions and evaluated the overall quality of the exams. The workshop was a success.

Licenses Issued or Renewed in 2017– 2019 by Type			
License Type	2017	2018	2019
Insurance Producers	134,955	141,938	149,491
Motor Vehicle Damage Appraisers	5,034	4,945	4,916
Surplus Lines Brokers	2,796	2,948	3,102
Public Insurance Adjusters	319	309	326
Insurance Advisors	626	642	654
Life Settlement or Loan Brokers	105	122	137
Portable Electronics Limited Lines Licenses	16	16	19
Reinsurance Intermediaries	221	242	253
Auto Club Agents	824	833	601
Auto Clubs	27	27	27
Banks in the Business of Insurance	93	91	84



## 6 State Rating Bureau

### 6.1 Mission

The mission of the State Rating Bureau (“SRB”) consists of three primary functions:

- Monitoring insurance markets;
- Developing technical reports and analyses on emerging trends in support of the Division’s regulatory responsibilities and
- Reviewing policy forms, rules and rates filed by or on behalf of insurance companies to ensure that insurance coverage and rating practices are actuarially sound, comply with all laws and regulations, and are fair to consumers.

The SRB participates on behalf of the Commissioner in numerous intra-governmental and public policy groups that evaluate policy options. It also works closely with the Division’s legal staff to develop regulatory guidance that clarifies rating and policy requirements. The SRB communicates rate filing procedures through filing guidance letters and assists in the development of guides and alerts that explain features of various insurance products to consumers.

### 6.2 2019 Goals

- Review the effects of the implementation of a reformed private passenger auto insurance market. Draft report considering consumer access, rate effects and competition within the private passenger automobile market.
- Compile data on dog bite claims under Homeowners insurance policies in accordance with the requirements of Chapter 19 of the Acts of 2018. Work with industry to design spreadsheet to capture data required by the statute. Prepare data for report due to legislature April of 2020.
- Draft Filing Guidance Notice and update Homeowners Insurance FAQ on division website to reflect requirement under Chapter 337 of the acts of 2018 requiring homeowners who intend to operate their property as short term rental to maintain liability insurance of not less than \$1,000,000 to cover each short-term rental.

### 6.3 Primary Activities

As the technical advisor to the Commissioner, the work of the SRB covers many different areas of the insurance marketplace. In 2019, the SRB performed reviews and analyses in the following areas of insurance:

- Private passenger automobile,
- Homeowners,
- Workers’ compensation,
- Medical malpractice,
- Life, and

- Accident and Sickness.

### **6.3.1 Private Passenger Automobile Insurance**

Private passenger automobile insurance accounted for approximately \$5.57 billion in Massachusetts written premium dollars in calendar year 2019, which is more than twice the level of premium collected for any other line of property and casualty insurance.

The SRB is responsible for:

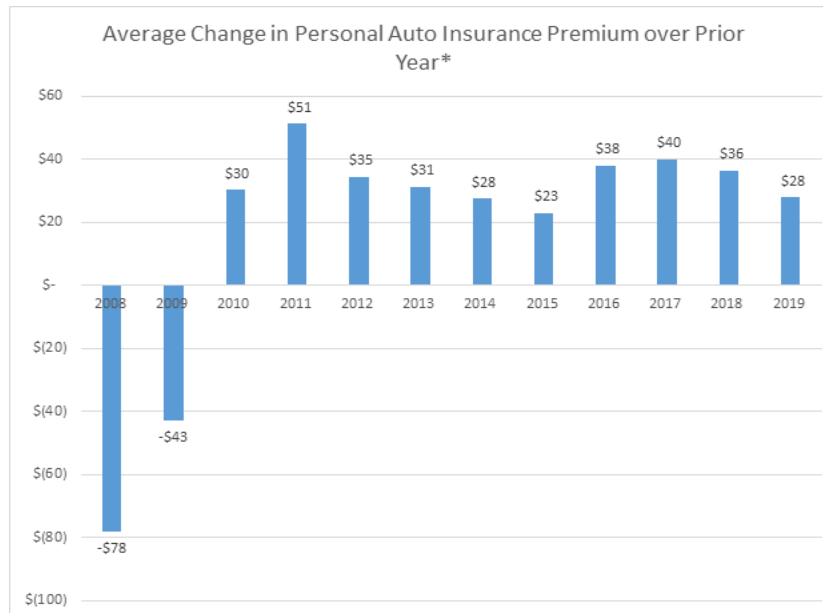
- Monitoring the activities of the residual market administered through Commonwealth Automobile Reinsurers (“CAR”);
- Reviewing all company and CAR form, rule and rate filings; and
- Reviewing statistical plan filings.

### **6.3.2 Transition to Competitive Rate Regulation**

Since the move to managed competition in the private passenger automobile insurance market on April 1, 2008, 19 new insurance companies have started writing private passenger auto insurance in Massachusetts. Twelve of the 19 new companies market their products through independent agents.

#### **Automobile Insurers Entering MA Since April 1, 2008**

AIG Private Client  
Allstate  
Ameriprise (IDS)  
Bankers Standard  
Berkley  
Cincinnati  
Esurance  
GEICO  
Green Mountain  
Harleysville  
Hartford (Trumbull)  
Midvale (American Family)  
Permanent General  
Praetorian  
Preferred Mutual  
Progressive  
PURE  
Safeco  
Vermont Mutual

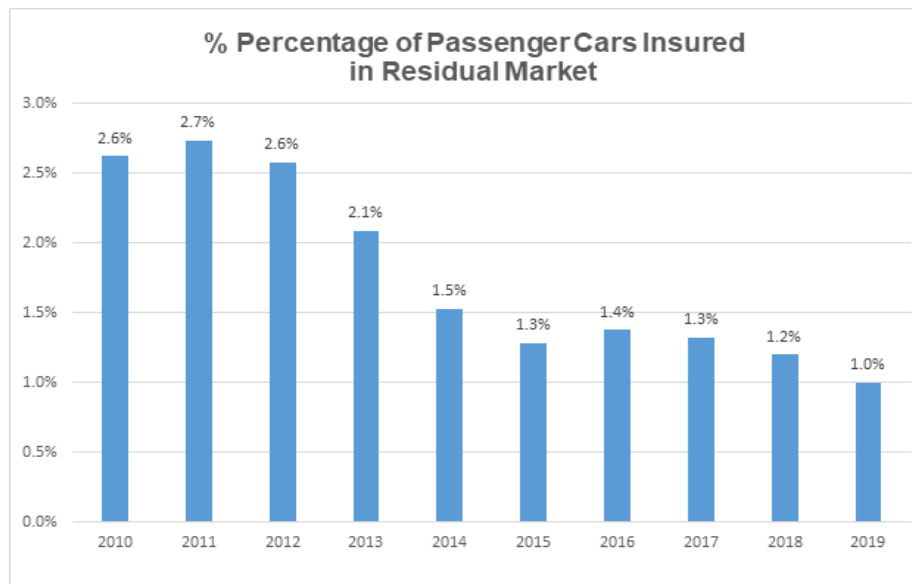


\*The most recent two years of data are estimates as the final historic NAIC data is not yet available. The estimated 2019 average personal automobile premium per vehicle is \$220 more than it was in 2007, prior to the introduction of competitive rate regulation.

### 6.3.3 Residual Market Reform

The final year of transition to an assigned risk plan for the private passenger automobile residual market began on April 1, 2009. The residual market declined from 2.7% of the total market at year end 2009 to 1.0% by year end 2019.

Significant procedural changes were implemented at CAR for the purpose of developing and maintaining credits for insurance companies that voluntarily insure policies that otherwise would likely be insured through the MAIP. Actual changes in residual market share continued to drive the indicated and actual credits in the market, which is a more transparent and objective process than had been followed in the past.



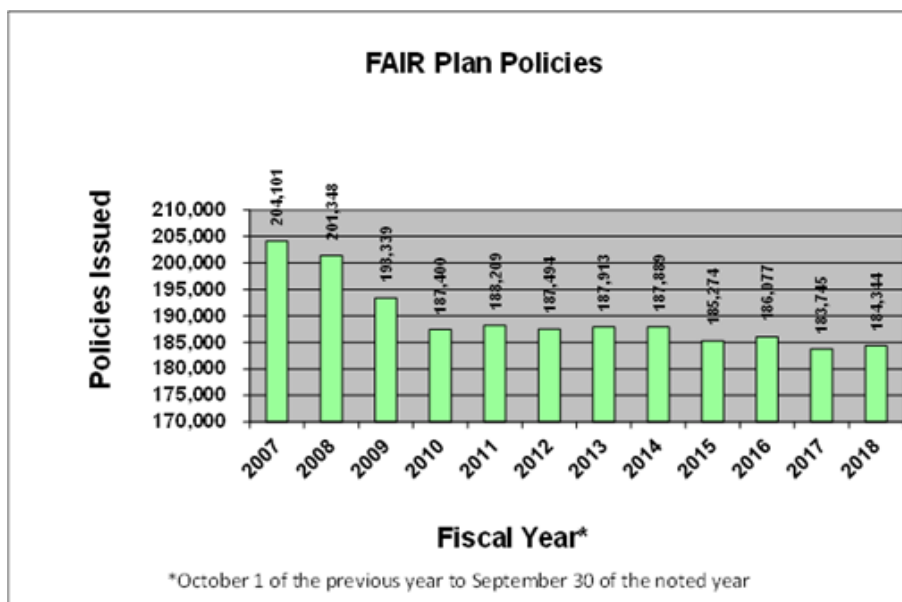
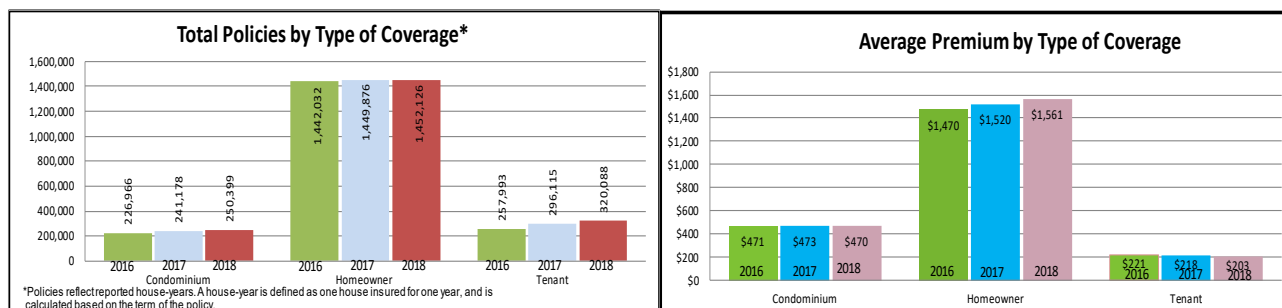
### 6.3.4 Homeowners Insurance

Homeowners insurance covers the cost of damage to one's home, as well as personal liability claims that may be filed against the owner of the home. The SRB is responsible for:

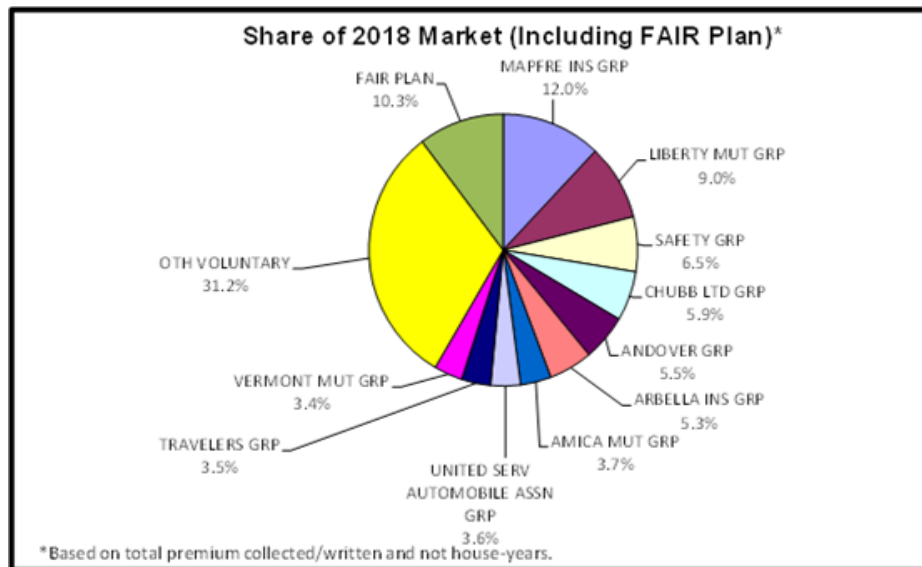
- Monitoring the market for coverage;
- Reviewing the activities of the residual market administered through the Massachusetts Property Insurance and Underwriting Association (the "FAIR Plan"); and
- Reviewing all company and FAIR Plan form, rule and rate submissions.

### 6.3.5 Commissioner's Report on Home Insurance

In 2019, SRB staff completed a report (required under M.G.L. c. 175, §§ 4A and 4B) that examines the market for home insurance, the causes of home insurance loss, trends in cancellations/non-renewals, and emerging trends in the availability of coverage, especially in coastal areas. A copy of the report is available on the Division's website. Among the findings of the report is that the number of Massachusetts home insurance policies written between 2016 and 2018 increased by approximately 95,621 policies.







The following chart identifies FAIR Plan rate changes since 1996. There has been no change to rates since 2011.

#### **FAIR Plan Home Insurance Rate Changes**

<u>Effective Date*</u>	<u>Percent</u>
12/31/1996	5.3%
12/31/1997	2.2%
12/31/1998	0.9%
12/31/1999	0.1%
12/31/2000	-0.5%
12/31/2001	-0.2%
12/31/2002	1.9%
12/31/2003	2.8%
12/31/2004	3.2%
10/1/2006	12.4%
3/31/2010	-0.7%

\*Years not shown had no rate change

#### **6.3.6 Workers Compensation Insurance**

Workers' compensation insurance covers lost wages, medical costs and rehabilitation costs associated with work-related accidents or illnesses. With few exceptions, employers are required to purchase workers' compensation coverage for their employees.

SRB staff review all industry bureau and individual company and Self-Insurance Group rate, rule, and form filings, including rate deviation filings. The coverage and rates are established according to the processes established under M.G.L. c. 152. Industry filings are coordinated through the Workers' Compensation Rating and Inspection Bureau of

Massachusetts (“WCRIB”), an entity licensed as a Rating Organization under M.G.L. c. 174A. The WCRIB also acts as the Division’s Statistical Agent and Pool Administrator.

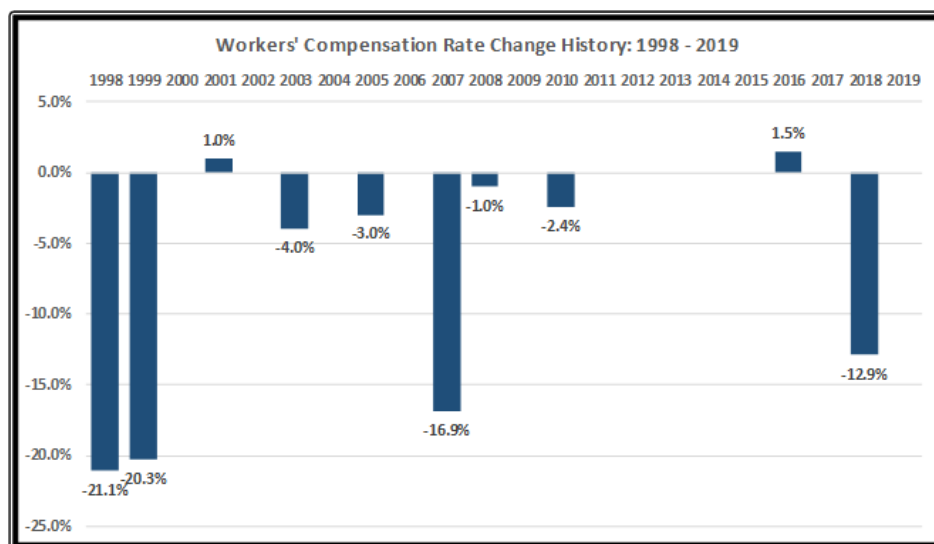
The State Rating Bureau is responsible for monitoring:

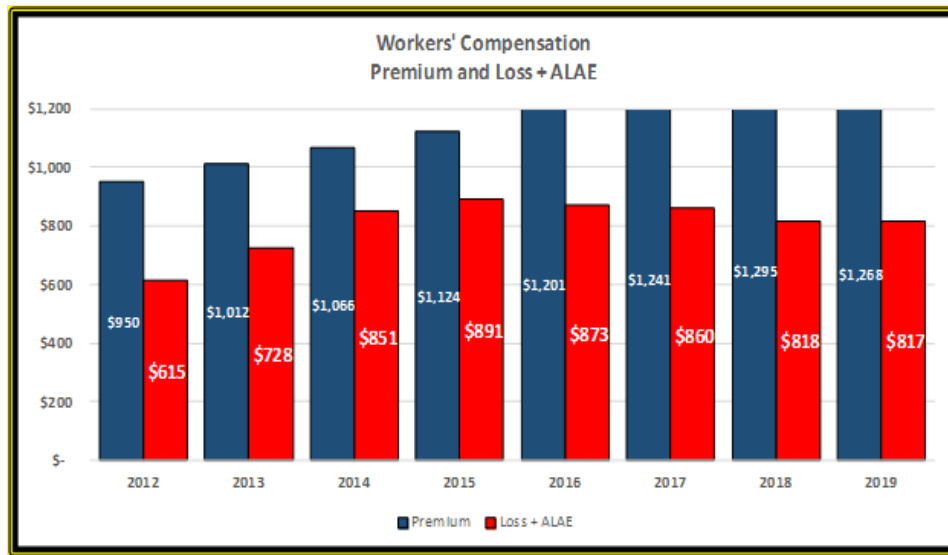
- Market-wide alterations in availability of coverage.
- The structure of the statistical plan documenting insurer loss and premium experience.
- The health and efficiency of the residual market pool.
- Industry-wide rates and rating programs for non-discrimination and actuarial appropriateness.

### 6.3.7 Rate Review

There was no change in workers’ compensation class rates in 2019. The WCRIB submitted a filing for a 3.8% decrease in average rates for industrial classes on December 20th of 2019 with a proposed effective date of July 1, 2020. Hearings were not scheduled to commence until 2020. On January 29, 2018, WCRIB had submitted a filing to establish an Audit Non-Compliance charge to be levied against voluntary market policyholders who do not allow their insurer to audit the payroll records used to determine final workers’ compensation premium. The hearing for the Audit Non-Compliance filing concluded March 26, 2019, with a decision affirming a stipulation establishing a two-year pilot period to test the effectiveness of the Audit Non-Compliance charge.

Fifty-three carrier groups and 10 Self-Insurance Groups maintained downward deviations in 2019, including 14 individual companies offering discounts of 25% and two SIGs offering deviations of 20%. Many companies also made individual filings of various non-standard rating plans, rules and forms. When such filings comport with Massachusetts law and are deemed to be both actuarially sound and not unfairly discriminatory, these submissions have been approved.





### 6.3.9 Medical Malpractice Insurance

Medical malpractice insurance covers medical malpractice claims and the expenses associated with defending alleged medical malpractice. The SRB is responsible for:

- Monitoring the market for coverage;
- Analyzing and collecting data;
- Reviewing the activities of the Residual Market Pool; and
- Reviewing all company-filed form, rule and rate filings.

In 2019, SRB staff completed the “Medical Malpractice Insurance in the Massachusetts Market 2018” report, which is available on the Division’s website.

#### **Annual Medical Malpractice Report – 2018 Findings**

- Premium dollars written for medical malpractice coverage increased from \$307.5M in 2012 to \$319.6M in 2018.
- Proportion of coverage written in regulated market dropped from 52.5% in 2012 to 37.7% in 2018.
- Proportion of coverage written in unregulated surplus lines and risk retention markets grew from 47.5% in 2012 to 62.3% in 2018.

### 6.3.10 Life Insurance

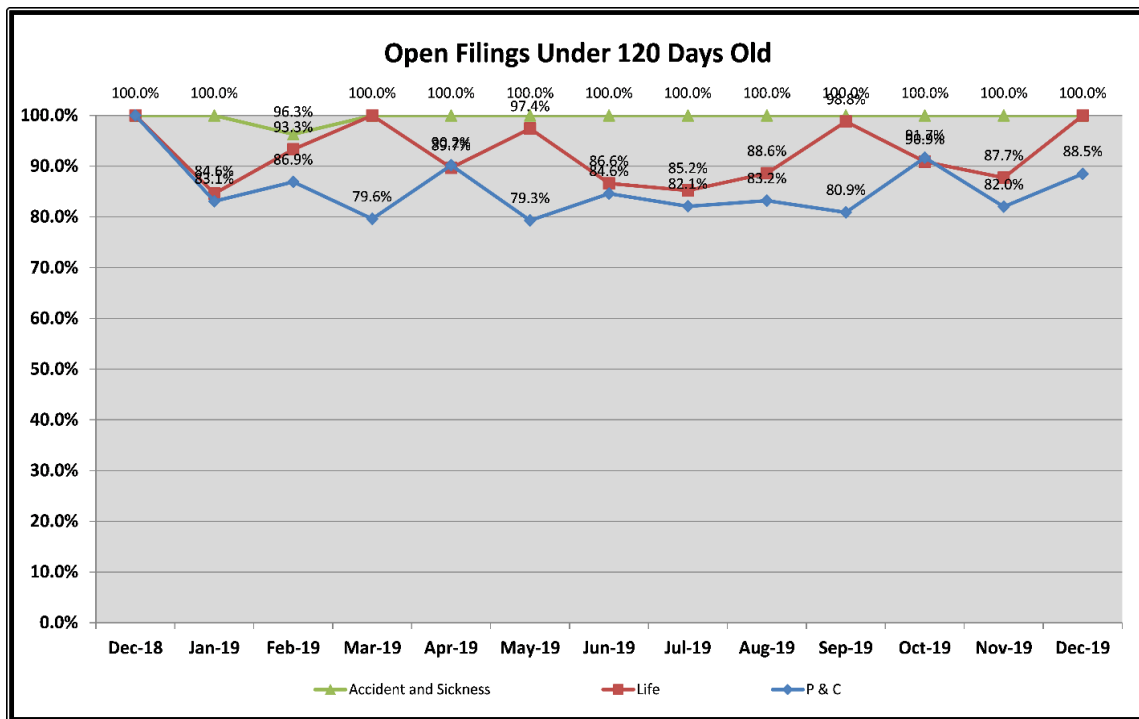
The Division promulgated no new life insurance regulations and issued no new life insurance bulletins during calendar year 2019.

## 7 Policy Form Review

### 7.1 Mission

The Policy Form Review Section is responsible for reviewing property and casualty, life and annuity, and individual accident and sickness filings made by insurance companies to ensure they are consistent with Massachusetts laws. The focus of these reviews is on consumer protection, adequate reserving for claims, and rate justification.

The Policy Form Review Section manages product reviews in order to timely complete them and make policy forms available for companies to use in the market. The Section monitors review time so that it can redeploy resources to address delays and timely complete reviews to appropriately speed products to the market.



## 8 Bureau of Managed Care

### 8.1 Mission

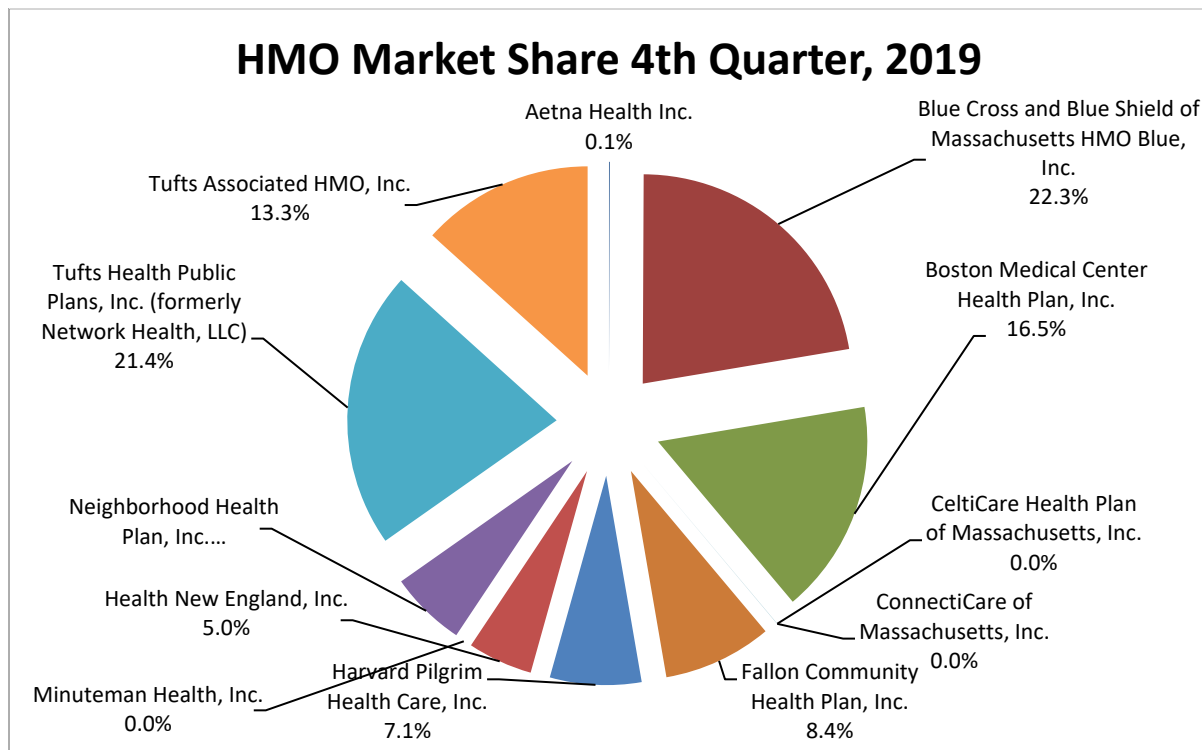
The Bureau of Managed Care (“BMC”) reviews health insurance company materials to determine whether their operations satisfy managed care protections required under M.G.L. c. 176O. These protections include those related to:

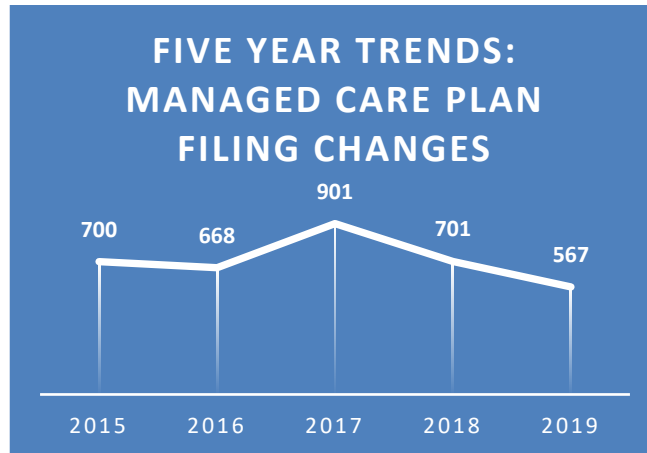
- Consumer disclosures

- Evidence of coverage
- Provider contracts
- Network directories
- Utilization reviews
- Quality assurance and credentialing
- Internal appeals systems.

In addition, the BMC advises the Commissioner on emerging issues associated with health reform, health insurance company operations and administrative practices, managed care practices, and mandated health benefits.

Health maintenance organizations (“HMOs”) provide the vast majority of all insured health plan coverage in Massachusetts. More than 2 million people receive health care coverage through an HMO plan provided by one of 10 companies. Relative market share during the 4th quarter of 2019 is shown below.





## **8.2 Managed Care Accreditation Reviews**

The BMC is responsible for conducting a comprehensive review every two years of all insured health plans with managed care systems to determine their compliance with the requirements of M.G.L. c. 176O. Companies that are not accredited are not permitted to offer a managed care plan in Massachusetts. In 2019, the BMC completed the review of 567 filings that were new or were submissions of material changes to previously submitted filings.

## **8.3 Mental Health Parity**

The Division continued to collect annual filings from carriers to verify compliance with federal and state mental health parity laws. The Division developed an aggregate report showing carrier responses, including 2018 data on behavioral health and medical requests for prior authorization of services. The Bureau of Managed Care also coordinates monthly meetings among Division staff to review and investigate potential claims of Mental Health Parity violations.

## **8.4 Substance Use Treatment Initiatives**

BMC staff coordinated work with the Legal Division to implement substance use treatment initiatives identified within Chapter 208 of the Acts of 2018 (“Chapter 208”). In each case, the Division held information sessions so that interested consumers, public health advocates and carriers could discuss the appropriate ways to implement the relevant provisions of Chapter 208.

Bulletin 2019-04 (“Copayment for Partial Fills of Opiate Products”) was issued on August 29, 2019 to clarify procedures that carriers were required to implement procedures so that they would not overcharge consumers for copayments when the consumer was obtaining a partial fill of an opiate product prescription.

Bulletin 2019-05 (“Standing Orders for Naloxone”) was issued on August 29, 2019 to instruct carriers to make any necessary modifications to their systems so that covered persons could obtain naloxone (sometimes referred to as Narcan, intended to fight

narcotic overdoses) without the need for the covered person to present a prescription written to the covered person.

Bulletin 2019-06 (“Guidelines for Pain Management Alternatives to Opiate Products”) was issued on August 29, 2019 to instruct carriers that make coverage available within health plans to at least two medication treatment options and at least three non-medication treatment options to treat pain as alternatives to the prescription of opiate products. Carriers were notified to file information with the Division about the alternative options and an explanation of the way that they would make these options known to consumers and providers for use when consider pain treatment options for 2020.

Bulletin 2019-07 (“Common Procedure Coding Systems for Opioid Agonist and Antagonist Treatments”) was issued on August 29, 2019 to instruct carriers and contracting providers about common procedure codes to use when billing for opioid agonist and antagonist treatments in order to facilitate payment for necessary and appropriate opiate use treatment.

## **8.5 Preventive Services**

The BMC coordinated the development of Bulletin 2019-10 (“State and Federal Requirements that Carriers Cover Certain Tobacco Cessation Products without Additional Cost-Sharing”) was issued on December 30, 2019 to clarify the Division’s expectations that carriers provide access to tobacco cessation products without any copayments, coinsurance or deductibles being applied to member.

The Division hired consultants to review carriers’ formularies and administrative processes for compliance with federal requirements and to review whether carriers are providing Essential Health Benefits that cover at least the greater of (1) one drug in every United States Pharmacopeia (“USP”) category and class, or (2) the same number of prescription drugs in each USP category and class as the State’s EHB-Benchmark plan. The Division expects to have consultants complete the work during the next year and issue their findings.

## **8.6 Collaborative Work on Expedited Inpatient Psychiatric Admissions**

The Division continues regular work with the Department of Mental Health to shorten the amount of time it takes health care providers to transfer behavioral health patients from emergency departments into appropriate inpatient beds for mentally ill patients. In 2018, issued a Bulletin in 2018 jointly with the Department of Public Health and the Department of Mental Health to establish procedures among health carriers, emergency departments, and the Department of Mental Health to shorten the amount of time it takes health care providers to find appropriate inpatient beds for severely mentally ill patients.

The BMC coordinated the development of Bulletin 2019-08 (“Updated Protocols for Prevention of Emergency Department Boarding of Patients with Acute Behavioral Health and/or Substance Use Disorder Emergencies”) was issued on November 13, 2019 to instruct carriers about updated procedures to shorten the timelines used by providers

and carriers to notify the Department of Mental Health about barriers to transferring emergency department patients to appropriate inpatient psychiatric beds.

## **8.7 Coordination of the Provider Directory Task Force**

Section 4 of Chapter 124 of the Acts of 2019 requires that the Division “establish a task force to develop recommendations to ensure the current and accurate electronic posting of carrier provider directories in a searchable format for each of the carriers’ network plans available for viewing by the general public.” The Health Care Access Bureau and the Bureau of Managed Care coordinated the appointment of representatives to the task force and the meetings to identify the information that carriers would be required to collect, store, display and audit to improve the quality of information available to managed care members. A report is expected to be produced in 2020 along with the development of proposed regulatory changes to accomplish the work of the task force.

## **8.8 Collaborative Work on Behavioral Health for Children and Adolescents (BHCA)**

The Division issued a Bulletin in 2018 jointly with the Department of Public Health and the Department of Mental Health in order to assist patients presenting at emergency departments needing care in an inpatient psychiatric facility. As part of this process, the Division oversaw joint efforts among Massachusetts health carriers, emergency departments, and the Department of Mental Health in shortening the amount of time it takes health care providers to find appropriate inpatient beds for severely mentally ill patients. This work has continued during 2019 in collaboration with the Department of Mental Health.

## **8.9 Federal Grant Initiatives**

The Division hired consultants to review carriers’ formularies and administrative processes for compliance with federal requirements and to review whether carriers are providing Essential Health Benefits that cover at least the greater of (1) one drug in every United States Pharmacopeia (“USP”) category and class, or (2) the same number of prescription drugs in each USP category and class as the State’s EHB-Benchmark plan. The Division expects to have consultants complete the work during the next year and issue their findings.

# **9 Health Care Access Bureau**

## **9.1 Mission**

The Health Care Access Bureau (“HCAB”) is responsible for monitoring the market for health insurance coverage, concentrating on the availability and affordability of coverage. Members of the HCAB work with many other state agencies, including the Health Policy Commission, Group Insurance Commission, Center for Health Information and Analysis, Executive Office for Health and Human Services, Department of Public



Health, Department of Mental Health, the Attorney General's Office and the Commonwealth Health Insurance Connector Authority, to ensure that regulations and bulletins follow consistent approaches across state agencies.

## **9.2 Risk Bearing Provider Organizations (RBPOs)**

HCAB staff worked closely with the Legal and Financial staff to review 12 risk certification waiver applications as well as 33 risk certification applications to be effective between March 1, 2020 and February 29, 2021.

## **9.3 ACA Implementation**

In 2019, the Division continued to work closely with other state agencies and the federal government to determine how rules governing implementation of the ACA would be applied in Massachusetts, so that guidance could be given to carriers as they continued to develop products and rates for the Massachusetts' merged market.

Medical Loss Ratio (MLR) rebate filings for the period 2016-2018 were reviewed, with an overall rebate amount of over \$47 million returned to policyholders.

## **9.4 Small Group Rate Review**

During calendar year 2019, the Division reviewed Massachusetts small group carriers' filings submitted for 2nd quarter, 3rd quarter and 4th quarter 2019 rates, as well as the rates to be effective for 1st quarter 2020. Rate filings for dental insurance were also reviewed. All rate filings were reviewed by the Division's internal actuary and external consulting actuaries for completeness according to the filing standards identified in 211 CMR 66.00; to verify that the filings did not trigger any of the presumptive disapproval standards for medical loss ratio, administrative expenses, or contribution-to-surplus; and to examine the reasonableness of the rates in relation to the benefits provided in the filing. The final approved statewide average rate changes are set forth in the table below:

<b>Quarter</b>	<b>Statewide Average Rate Change</b>
2Q19	+5.2
3Q19	+5.4
4Q19	+6.0
1Q20	+5.1

To assist with the improvement of the rate review process, the HCAB completed the remaining research project conducted by external consultants as part of a federal grant program regarding IT system cost – and thus health insurance rate – increases.

## **9.5 Merged Market Advisory Council (MMAC)**

Executive Order 589 created an advisory council to be chaired by the Commissioner of Insurance to “prepare a report that summarizes the status of the merged market based

on an independent actuarial analysis and that makes recommendations for improved market functioning, including any policy and legislative changes that the Council recommends to ensure affordability and stability of coverage for small businesses and individuals". The Health Care Access Bureau was charged by the Commissioner to coordinate the administrative work of the Council, the actuarial research conducted by consulting actuaries and the orderly process to consider, discuss and evaluate options during scheduled MMAC meetings. A report is expected to be produced in 2020 along with the development of proposed recommendations for future legislative or regulatory action.

## **9.6 Health Reform Bill**

Health Care Access Bureau staff met with members of the Governor's Administration and legal team to develop sections of the Governor's proposed Health Reform Bill - H. 4134 – intended to address balance billing, facility fees, registration of pharmacy benefit managers and improved access to small group health coverage options. The bill was filed in November of 2019 and was under legislative review.

## **9.7 Administrative Simplification**

HCAB staff continued in 2019 to work with the Center for Health Information and Analysis ("CHIA") toward the goal of sourcing health/dental insurance data from CHIA's All Payers Claim Database ("APCD") instead of from insurer-generated data calls and reports. The focus in 2019 was to finalize the process of transitioning utilization and claims reporting to the APCD. The HCAB engaged the firm of Oliver Wyman to assist with creating the programming logic required for this project. It is hoped that, once the HCAB is satisfied that the APCD data is sufficiently accurate for its reporting purposes, other state agencies will follow suit and use the APCD data for their information needs, with the goal of reducing the volume of data reporting by carriers, leading to associated administrative cost savings and, thus, rate reductions.

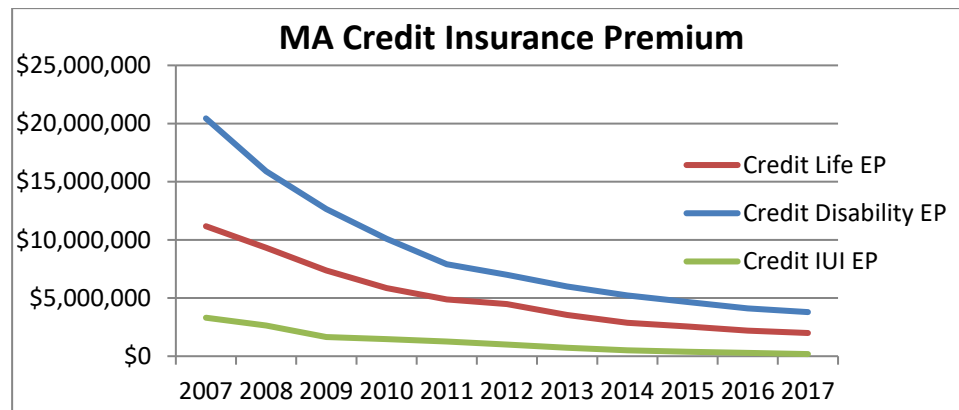
## **9.8 Credit Insurance Reports**

Credit insurance is offered with many non-mortgage loans and credit card applications. Depending on the coverage, these products will pay all or some portion of outstanding loan balances in the event of the death, disability, or involuntary unemployment of the covered person. Insurance companies offering these policies must issue special disclosures that make the covered persons aware that they are not required to purchase the coverage to obtain the loan or credit. Insurers must also comply with special statutory loss ratio requirements.

The Division compiles an annual report on credit insurance based upon information submitted by the individual carriers. In the course of reviewing the data, the HCAB determines whether companies continue to satisfy the statutorily required minimum loss ratios for credit life (50%), credit accident and sickness (55%), and credit involuntary unemployment insurance (60%).

In general, the level of coverage issued in Massachusetts has continued to drop as other non-insurance debt relief products (e.g., debt cancellation products) become available

from banking institutions. Between 2008 and 2018, total reported credit insurance premium for Massachusetts fell from \$28 to \$5 million, a reduction of over 80%.



## 10 Office of the General Counsel

### 10.1 Mission

The Office of General Counsel (“OGC”) assists the Commissioner in administering the laws of the Commonwealth as they pertain to the protection of the insurance consumer through the regulation of the insurance industry. The OGC further assists the Commissioner in monitoring the solvency of insurance companies by coordinating the rehabilitation of financially troubled insurers and the takeover and liquidation of insolvent insurers.

### 10.2 2019 Accomplishments

- Provided legal support and advice to the Commissioner, Division staff, consumers, executive and legislative branch members, and other interested parties in the Massachusetts insurance marketplace.
- Reviewed and analyzed proposed or enacted legislation affecting insurance companies and the insurance-buying public.
- Researched and drafted regulations, regulatory bulletins, and interpretative letters on Massachusetts insurance laws and regulations.
- Served as hearing officers in various regulatory proceedings, including hearings concerning new or amended regulations and proposed financial transactions such as acquisitions.
- Provided a flexible alternative to litigation through the adjudicatory hearing and administrative appeal processes conducted by the Hearings and Appeals Section. Adjudicatory hearings include insurance rate proceedings and enforcement actions against Division licensees, and administrative appeals

include appeals from decisions of the residual market entities overseen by the Commissioner.

### 10.3 Receiverships

If a Massachusetts domestic insurer's financial condition becomes impaired, the Commissioner is, by statute, empowered to seek a judicial order for appointment as receiver of the subject insurer. The Commissioner as receiver of a domestic insurer has the responsibility to act as a fiduciary on behalf of policyholders and creditors to provide the greatest possibility that, at the conclusion of the matter, an insurer's obligations to policyholders will be met at or near 100%. This arguably extreme measure is designed for the benefit of all creditors, but the protection of policyholders is of the utmost concern.

Receiverships may involve plans to rehabilitate, run-off, or liquidate a company. If the Commissioner determines that an insurer lacks sufficient assets to meet all of its obligations to policyholders in the ordinary course of business, then such insolvent insurer will be liquidated. The Commissioner as liquidator marshals the insolvent insurer's assets, liquidates the assets, adjudicates claims, and makes distributions to approved creditors of the company.

If a foreign insurer doing business in Massachusetts becomes financially impaired, the Commissioner may seek judicial appointment as Ancillary Receiver for the purpose of conserving the impaired foreign insurance company's assets in the Commonwealth for the benefit of its Massachusetts' policyholders and creditors.

Domestic and Ancillary Receiverships			
Active Domestic Receiverships			
Date Commenced	Company	Status	
03/09/1989	American Mutual Liability Insurance Company and American Mutual Insurance Company of Boston	In Liquidation	
11/01/2000	Lumber Mutual Insurance Companies	In Rehabilitation	
06/09/1994	Monarch Life Insurance Company	In Rehabilitation	
05/12/2009	Eastern Casualty Insurance Company	In Liquidation	
08/02/2017	Minuteman Health, Inc.	In Liquidation	
Closed Domestic Receiverships			
None			
Active Ancillary Receiverships			
Date Commenced	Company	State	Estimated Assets (market value as of 12/31/19)
06/06/2005	Home Insurance Company	NH	\$2,762,579
Closed Ancillary Receiverships			
10/03/2001	Reliance Insurance Company	PA	Closed: 02/01/2019

### **10.3.1 Distributions to Creditors**

\$192,958.67 in Class 2 distributions were made to Minuteman Health, Inc. policyholders and their providers in 2019.

### **10.3.2 Ancillary Receivership Closed**

Reliance Insurance Company (“Reliance”) (SJC - 2001 - 0496)

On December 11, 2018 the Court approved the Ancillary Receiver’s request to transfer all of the remaining Reliance assets in the custody of the Ancillary Receiver to Reliance’s Domiciliary Liquidator. Pursuant to the Court’s December 11, 2018 Order \$29,755,349 was transferred to the Domiciliary Liquidator in January, 2021. The Ancillary Receivership Proceeding was closed on February 1, 2019.

## **10.4 Other Activities**

### **10.4.1 Public Records Requests**

The OGC provides the Records Access Officer for the Division and supervised and assisted in responding to more than 465 public records requests in 2019 and maintained agency compliance with the data collection requirements of the public records law. The OGC provides public records law education and training to all new employees and interns at the start of their Division employment.

### **10.4.2 1033 Committee Reviews**

In 2019, Division attorneys and other Division staff continued to serve as the Commissioner’s appointees to an advisory committee that reviews all applications for written consent to engage or participate in the business of insurance in Massachusetts under the provisions of the federal Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. § 1033 (“§1033 Committee”). The advisory committee makes recommendations to the Commissioner on the disposition of such applications. In 2019, the § 1033 Committee responded to several inquiries and received one completed application for written consent to engage in the business of insurance, which the Commissioner granted at the recommendation of the Committee.

# **11 Special Investigations**

## **11.1 Mission**

The Special Investigations Unit (“SIU”) investigates allegations of misconduct by licensees and certain non-licensees and recommends enforcement action where appropriate. These investigations involve finding, reviewing, and documenting evidence supporting allegations of unfair methods of competition, unfair or deceptive acts or practices in the business of insurance, and other violations of insurance laws and

regulations. Division enforcement attorneys pursue appropriate enforcement action by applying relevant law to the facts and evidence developed by the SIU during the investigation. Enforcement case results are reported on the Division's website and to the Regulatory Information Retrieval System database ("RIRS") of the NAIC, which is accessible by insurance regulators in other jurisdictions.

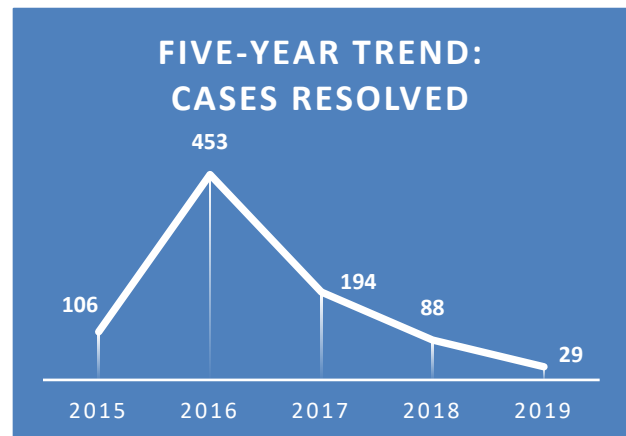
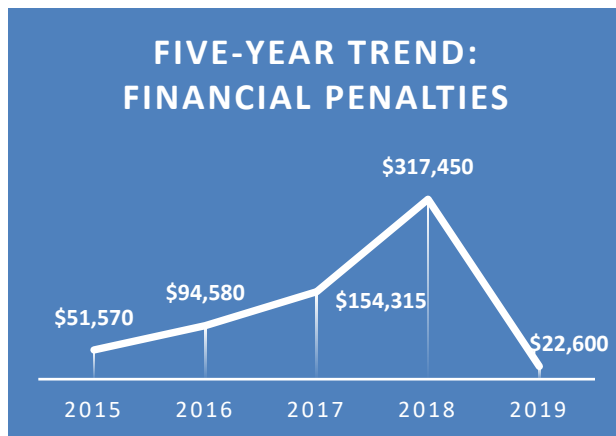
## 11.2 2019 Accomplishments

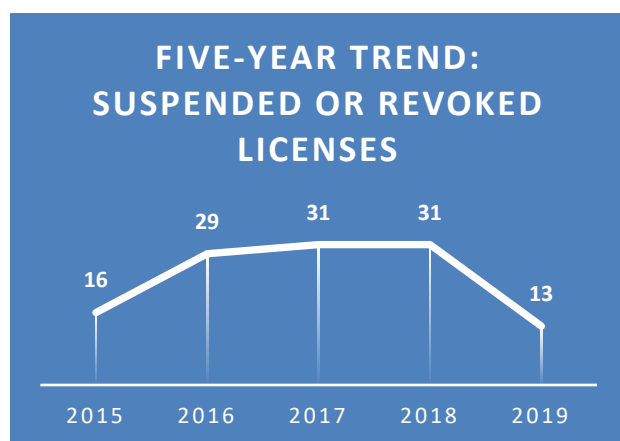
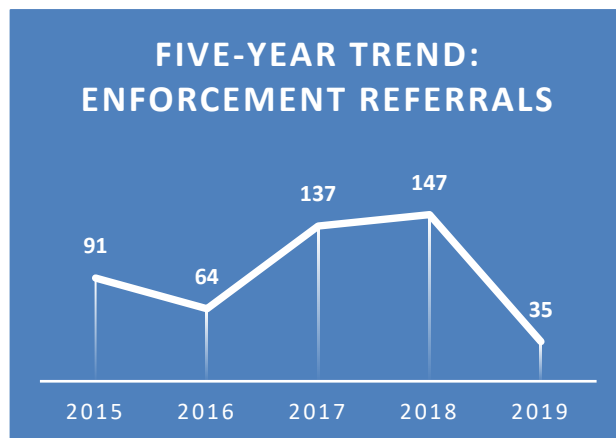
The SIU and enforcement sections closed a total of 126 cases in calendar year 2019. Common allegations investigated in this group of cases include:

- Licensees failing to make appropriate disclosures on license applications;
- Licensees failing to timely disclose administrative or criminal matters to the Division; and
- Licensee misrepresentation on insurance policy applications.

Results among the 29 enforcement cases resolved in 2019 include the revocation of 13 individual producer licenses. There were 15 settlement agreements to cease and desist from improper conduct and/or from transacting insurance business in Massachusetts. There were 6 additional cease and desist orders issued by a Hearing Officer.

- Opened 107 investigations and referred 35 cases from the SIU to Enforcement.
- Assessed financial penalties in the amount of \$22,600.00.
- Scanned approximately 56 closed cases in its on-going project to digitize its closed inventory.





## 12 Board of Appeal

### 12.1 Mission

The role of the Board of Appeal (the “Board”) is to conduct hearings for consumers appealing:

- The determination by an insurer that the insured was primarily at fault for a motor vehicle accident.
- Any decision of the Registry of Motor Vehicles (“RMV”); and
- An insurance cancellation issued to a consumer by his or her insurance company.

### 12.2 Primary Activities

On average, the Board’s hearing officers hear approximately 25,000 – 40,000 at-fault accident determination appeal cases and 2,500 – 6,000 appeals of RMV actions per year. In 2019, the Board received 26,016 new appeals, with 26,344 live hearings scheduled. In addition, the Board responds to consumer inquiries, researches legal

issues, proposes new legislation, and works with the Office of the Attorney General to defend the Board's decisions in Superior Court.

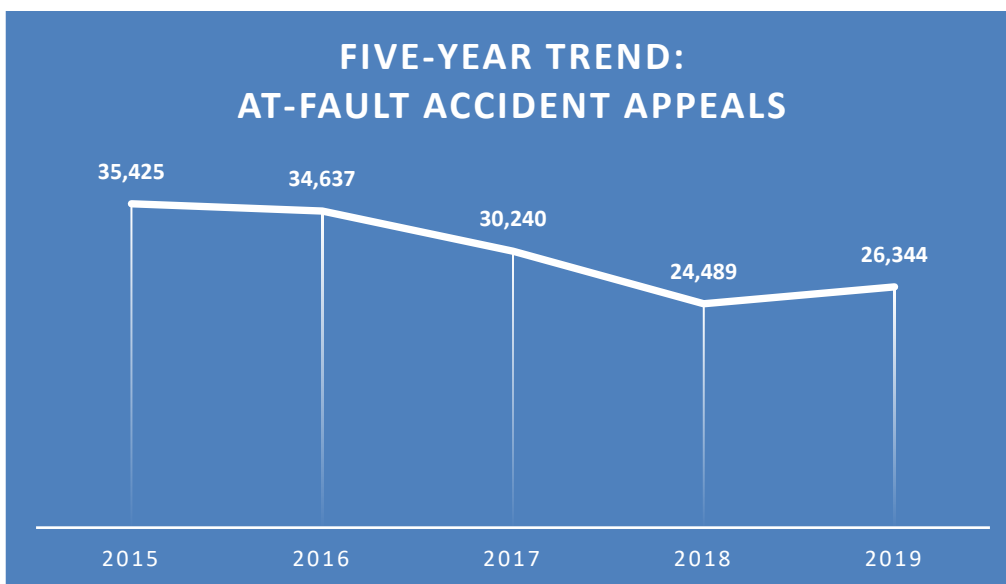
Hearings before the Board of Appeal are conducted in accordance with M.G.L. c. 30A, although the Board has also promulgated its own Practice and Procedure regulations for accident surcharge appeals – 211 C.M.R. 88.00.

### **12.3 Hearings on At-fault Accident Determinations**

Each automobile insurance carrier administers a unique system of adjusting premiums based on an operator's driving record. Typically, these merit rating plans decrease premiums for years of incident-free driving and increase premiums for operators with at-fault accidents or traffic citations. These premium adjustments create a financial incentive that encourages safer driving.

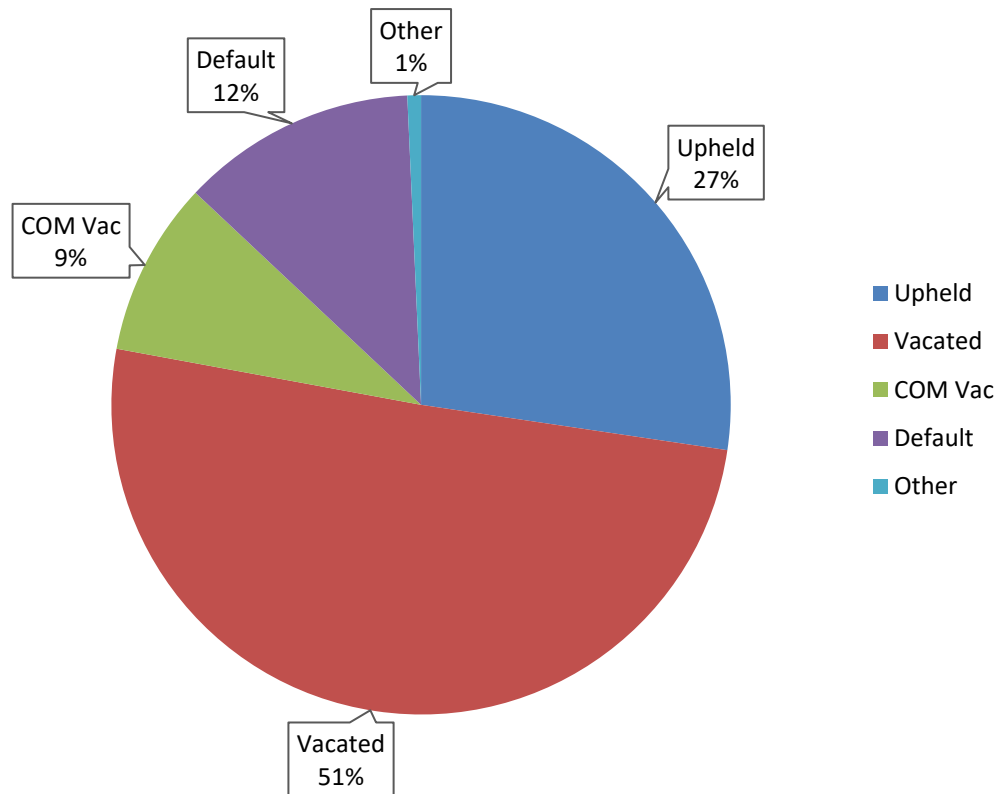
A driver who feels he or she is not at fault for an accident may elect to have a hearing in order to contest that at-fault determination. These hearings only look at whether a driver is more than 50% at fault for the accident. This process ensures that each company's merit rating plan is being run fairly and equitably. At the hearing, the appellant and the insurer have the right to present relevant facts and circumstances by oral testimony or by documentary evidence, as well as to present witnesses and question any testimony offered by the other party. The appellant may elect not to appear at a hearing and instead may submit a statement along with any relevant documents to the Board for an administrative review.

If the Board finds that the insurer's determination of fault was not in accordance with the Standards of Fault promulgated by the Commissioner pursuant to 211 CMR 74.00, the at-fault determination is vacated. The insurer must then refund to the appellant any additional collected premium that was specifically related to the vacated at-fault determination. If the Board finds that the insurer's determination of fault was in accordance with the Standards of Fault, the determination is upheld. The Board conducted 26,344 hearings on appeals of at-fault accident determinations in 2019.





## At-Fault Accident Decisions by Percentage 2019



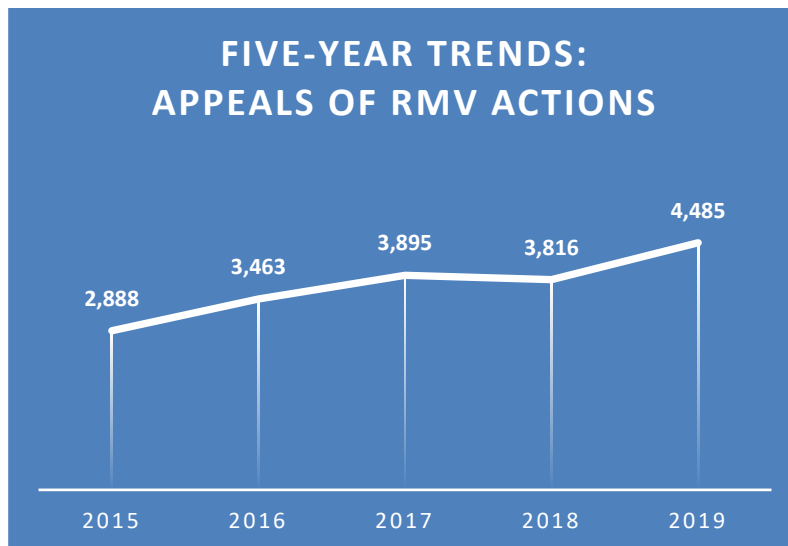
### 12.4 Hearing Locations

In order to provide greater convenience to consumers who need to schedule an appeal hearing, the Board held hearings at eleven satellite locations throughout the Commonwealth in addition to its primary office in Boston. In 2019, satellite locations included Dedham, Leominster, Marlboro, Peabody, Plymouth, Somerville, Somerset, Springfield, South Yarmouth, Waltham and Worcester.

BOSTON	2892
DEDHAM	3170
LEOMINSTER	1456
MARLBORO	1088
PEABODY	2659
PLYMOUTH	1652
SOMERVILLE	3637
SOMERSET	2043
SPRINGFIELD	2906
SOUTH YARMOUTH	274
WALTHAM	2134
WORCESTER	2426
<b>Total</b>	<b>26,344</b>

## **12.5 RMV Appeal Hearings**

The Board was created by M.G.L. c. 26 § 8A and is given broad discretion through M.G.L. c. 90 § 28 to entertain appeals from any decision made by the RMV. The majority of the appeals the Board hears involve driver's license suspensions, inspection station suspensions, school bus operator 7D certificates and ignition interlock violations. The Board reviews applicable law, sworn testimony, and relevant documentation from both an RMV representative and the appellant. After the hearing, the Board decides whether to affirm the Registry's decision or ruling, or whether to modify their decision in any way. If the decision allows a license privilege to be reinstated partially or fully, to become reinstated the appellant must take the decision to the RMV to complete the required administrative procedures. A favorable decision is not equivalent to an operator's license being reinstated; it authorizes the appellant to go the RMV to become reinstated with or without restriction. The Board does not review license suspensions arising from a chemical test refusal or statutory revocation pursuant to a court order. In 2019, the Board received 5,474 RMV hearing appeal requests and conducted and decided 4,485 hearings on appeals from RMV decisions.



### **Breakdown of Types of RMV Appeals Heard and Decided by the Board in 2019**

Interlock Violations	93
Interlock Device	150
Operating Under the Influence	1,258
4 yr. loss Habitual Traffic Offender	128
Immediate Threat	695
Drug Charge	33
30-day suspension/Handicap Placard Misuse	1
30-day suspension/3 Speeding Tickets	19
45-day suspension/5 Surchargeable Events	0
60-day suspension/Driving to Endanger/Recklessly	242
60-day suspension/7 Surchargeable Events	115
CDL Loss	154
Complaint Fraudulent License	224
Operating After Suspension	59

Inspection Sticker	21
Inspector	15
Dealer/Repair/Farm	0
Handicap Placard Refusal	48
Fatal Accident Preliminary	5
Vehicular Homicide	39
Leaving the Scene/Property damage	22
Leaving the Scene/Personal injury	6
Medical Problem	133
Student Transport 7D License	7
JOL Speeding	133
No Insurance	6
Driving school	1
Tinted Windows	11
Other	876
<b>Total:</b>	<b>4,354</b>

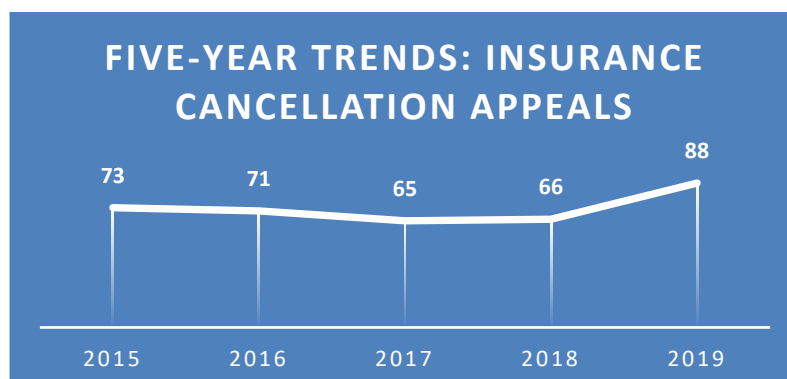
Note: The total number of RMV decisions rendered in 2019 will vary from the total number of RMV appeal requests received in 2019, based on appeal requests received in 2018 that were decided in 2019 or appeal requests received in 2019 that were not decided in 2019.

## 12.6 Automobile Insurance Cancellations

The Board also hears complaints arising from automobile insurance cancellations. If a cancellation is at issue, the complaint must be filed with the Board before the cancellation date. If the complaint is timely filed, the policy will remain in effect until the Board has issued its decision. If an appeal is filed after the cancellation date, but within 10 days of cancellation, the appeal will be heard by the Board, but the cancellation nevertheless will take effect. There were 88 insurance cancellations appeals heard in 2019.

A complaint may not be filed:

- If a policy has been secured from another insurance company;
- For non-payment of premium on a registered taxicab or fleet of taxicabs;
- On a cancellation of a policy effected by a finance company; or
- If a company refuses to renew a policy after the expiration of said policy.



## **13 Automobile Damage Appraiser Licensing Board**

### **13.1 Mission**

Pursuant to M.G.L. c. 26, § 8G, there is within the Division the Automobile Damage Appraiser Licensing Board (“ADALB” or “Board”). The ADALB is responsible for the regulation of motor vehicle damage appraisers in Massachusetts. Four of five ADALB members are appointed by the Governor, two of whom shall be affiliated with the auto body repair industry, and two of whom shall be affiliated with insurance companies writing casualty insurance within the Commonwealth. The fifth member, who is not affiliated with the auto body industry or insurance industry, is appointed by the Commissioner of Insurance and serves as the ADALB's chairperson. The ADALB institutes and maintains standards for the conduct of motor vehicle damage appraisers. It conducts licensing examinations, processes applications, and issues and renews licenses. The Board can suspend, cancel, and revoke licenses, following a hearing process that originates from complaints that are filed before the ADALB. The Board also may decline to renew licenses when allegations of misconduct have been brought against licensees. The ADALB sets licensing eligibility requirements, approves training programs, administers the practical portion of the license examination (Part-II), and establishes license revocation guidelines. It also holds frequent public meetings throughout the year.

In 2019, the ADALB issued 183 new licenses and approved 4,832 license renewals. The ADALB received 16 complaints and no licenses were suspended, revoked, or cancelled. It held 4 license exams in 2019 that were taken by 199 applicants.

## **14 Consumer Services**

### **14.1 Mission**

The Consumer Services Unit (“CSU”) responds to inquiries and assists consumers in resolving insurance complaints or disputes against insurers, producers and other licensees. The Unit works to ensure that consumers are being treated in a fair and consistent manner by licensees. CSU helps consumers resolve various issues including claims, billing, benefits, underwriting and misrepresentation of policies, premium refunds, and cancellation concerns. The Unit protects policyholders by empowering and educating the public about insurance coverage, laws, and regulations. Unit personnel work to provide consumer education through consumer advisories and online resources. When appropriate, the Unit offers referral services to other organizations and state agencies, including the Massachusetts Health Connector, US Department of Labor, and Office of Patient Protection.

## **14.2 2019 Goals**

- Investigate the majority of complaints within six months of receipt.
- Provide a customized and comprehensive response to all consumer inquiries in a timely manner.
- Respond to formal complaints with a customized letter detailing findings and, whenever applicable, assist consumers in receiving justifiable recoveries, such as required claim payments and premium refunds.
- Monitor reported consumer complaints for issue trends or patterns of improper business practices. Collaborate with the Market Conduct and Special Investigation Units on notable concerns.

## **14.3 2019 Accomplishments**

- CSU staff handled approximately 195 formal written information requests. The majority of questions from consumer's concerned continuation of coverage, company contact information, denied claims, claim settlement delays, and premium rates.
- Insurance examiners received 2,285 new formal complaints and investigated and closed 2,890 cases.
- CSU resolved most complaint investigations within an average of 100 days of receiving the full complaint file and obtained \$1,281,334.28 in recovered funds on behalf of consumers for the people of Massachusetts.

## **14.4 Consumer Hotline**

Insurance consumers can receive personal assistance from the CSU by calling the Consumer hotline Monday through Friday, 8:45 am to 5:00 pm. CSU responds to consumer issues in real-time, and, in an average year, CSU staff responds to over 10,000 calls.

## **14.5 Complaint Investigations: Protecting Policyholders**

When a consumer files a formal complaint with CSU, after confirming jurisdiction the licensee named in the complaint is contacted in order to gather and review information. The complaint is then assigned to an insurance examiner to investigate the allegations and to work with the consumer and licensee toward a resolution. Complaints are investigated in accordance with applicable insurance laws, regulations, and contract provisions.

Complaints address consumer protection issues, such as delays in claim payment, concerns about increasing premiums, and cancellation of coverage. CSU closely monitors and tracks complaints in order to detect possible systemic concerns. Consistently, the top three common types of insurance coverage which the CSU

receives complaints in regard to are auto, home, and health insurance. Some formal complaint investigations may have findings that the concern was unjustified; namely, when there is no apparent violation of a policy provision, contract provision, rule or statute, or there is no valid concern that a prudent layperson would regard as a practice or service that is below customary business practice.

Complaint resolution may result in recovered monies or realized coverage for consumers. The Unit received an average of 190 formal written complaints each month in 2019. Below are the 5 top reasons for complaints, as well as the top 5 companies complained against in 2019:

#### **Top 5 Reasons for Complaints in 2019 – All Complaints**

- 1) Denial of Claim
- 2) Claim Delay
- 3) Adjuster Handling
- 4) Unsatisfactory Settlement/Offer
- 5) Authorization Dispute

#### **Top 5 Companies Complained Against in 2019– All Complaints**

- 1) Commerce Insurance Company
- 2) Government Employees Insurance Company
- 3) Blue Cross and Blue Shield of Massachusetts, Inc.
- 4) Liberty Mutual Insurance Company
- 5) Safety Insurance Company

## **14.6 Online Consumer Publications and Information**

As part of its mission to provide insurance consumers with accurate and useful information, the Division produced a variety of consumer advisories and informational blogs in 2019. These materials deliver information on relatively complicated insurance topics in a manner that is accessible and easily understood by consumers.

- Consumer advisory on Unlicensed Health Plans that warns consumers of the risks of purchasing a health plan that is not approved by the Division of Insurance, with tips for choosing the right health plan for them.
- Informational blog post on how to perform a home inventory of one's personal belongings for claim filing purposes.
- Informational blog post on automobile physical damage coverage.
- Informational blog post on optional insurance coverages homeowners can purchase for their home.

The Unit also revamped the consumer-focused information on the Division's website including updating information on the three major lines of coverage, centralizing the most frequently requested consumer resources and developing informational pages on pet insurance, title insurance, disability income insurance, and developed a Q&A to help short-term rental operators understand the added insurance requirements under the short-term rental law that went into effect on July 1, 2019.

# 15 Administration

## 15.1 Mission

The Administration Unit is responsible for providing Division employees with various operational and administrative services related to the Division's budget; supply procurement, personnel and hiring; and workplace safety and comfort. It ensures that other agency departments have the necessary resources to carry out the Division's regulatory mission.

The Administration Department's mission is to ensure:

- The availability of adequate funding to carry out the Division's mission;
- The efficient, accurate and secure receipt of revenue associated with fees, fines and assessments;
- Communication of and compliance with federal, state and collective bargaining labor requirements;
- The availability of knowledgeable, motivated and trained human resources capable of carrying out the Division's mission;
- The timely payment of all Division fiscal obligations;
- The best value procurement of goods and services;
- The safety and security of employees, visitors, and property; and
- A comfortable work environment for employees and visitors.

## 15.2 2019 Goals

- Complete billing of assessments according to timelines, so to ensure collection of all open receivables before year-end and ensure compliance with state Comptroller guidelines and Division internal control plan.
- Timely and accurately collect all revenue while ensuring compliance with Comptroller guidelines and the Division internal control plan.
- Timely complete all hiring and staffing requests to ensure sufficient available human resources to carry out the Division's mission.
- Guide agency users in drafting and issuing bid requests for various necessary professional services. Assist in evaluating and selecting qualified vendors. Ensure procurements are completed in compliance with Operational Services Division requirements.

# Appendix A: Acts, Regulations and Bulletins

## Acts of 2019

Chapter 41 - AN ACT MAKING APPROPRIATIONS FOR THE FISCAL YEAR 2020 FOR MAINTENANCE OF THE DEPARTMENTS, BOARDS, COMMISSIONERS, INSTITUTIONS AND CERTAIN ACTIVITIES OF THE COMMONWEALTH, FOR INTEREST, SINKING FUND AND SERIAL BOND REQUIREMENTS AND FOR CERTAIN PERMANENT IMPROVEMENTS.

Sections 53-58 of the Act amended M.G.L. c. 175, M.G.L. c. 176A, M.G.L. c. 176B, and M.G.L. c. 176G to prohibit a carrier from retroactively denying a behavioral health services claim unless: 1) the denial occurs less than 12 months from the time of submission of the claim, 2) the carrier has furnished the provider with a written reason for the claim denial and what is required to be provided to have the claim approved, and 3) the carrier allows the provider 30 days to submit the additional documentation required for payment of the claim. The amendments provided that a retroactive claim denial may be allowed after 12 months only if the claim was submitted fraudulently, the claim or services for which the claim was submitted is subject to legal action, the claim payment was incorrect because the provider was paid or the insured already paid for the services or the services identified in the claim were never delivered by the provider. If a retroactive claim denial is imposed because the payment is subject to adjustment due to expected payment from any other party, the Act required the carrier to notify the provider within 15 days before imposing the retroactive claim denial. The Act permitted the provider 12 months from the denial date to determine if the claim should be paid by a secondary insurer.

Chapter 122 – AN ACT REQUIRING THE HANDS-FREE USE OF MOBILE TELEPHONES WHILE DRIVING

This Act amended M.G.L. c. 90 to permit the use of electronic devices while driving on a public way only if the device is in hands-free mode. The Act applied to drivers of all ages. First and second offenses under the Act are not surchargeable offenses for insurance purposes, however a third offense may result in a premium increase. All violations by operators of public vehicles such as public bus or a school bus are surchargeable offenses under either M.G.L. c. 175 or M.G.L. c. 90.

Chapter 147 – AN ACT PRESERVING THE COMPETITIVENESS OF GROUP AUTO AND HOMEOWNERS INSURANCE PLANS

This chapter created a free-standing Act providing that a group marketing plan approved and in effect pursuant to M.G.L. c. 175, § 193R during calendar years 2020-2024 may be approved on renewal notwithstanding that less than 35% of its members were insured during the calendar years 2020 to 2024.

## 2019 Regulations

211 CMR 71.00 – Medicare Supplement Insurance to Facilitate the Implementation of M.G.L. c. 176K and Section 1882 of the Federal Social Security Act



This regulation was amended to conform the regulation to revised federal statutory requirements for Medicare Supplement insurance policies, which establish uniform standards for the contents, disclosures and marketing of Medicare Supplement Insurance policies. The amendments deleted eight appendices to the current regulation as the information in those appendices will be amended as required and reissued in the form of Filing Guidance.

## **2019 Bulletins**

### **Bulletin 2019-01 – Information about Certain Prescriptions Used in Underwriting Analyses**

This Bulletin was issued to provide guidance to insurance companies making underwriting decisions for individual accident and sickness policies, life insurance policies and annuity contracts regarding how insurers may consider certain medication information. The Bulletin discusses how to address certain medications not relevant to an applicant's health, and preventative medications prescribed for certain illnesses and diseases. Specifically, the Bulletin addresses prescriptions for naloxone when naloxone or another opioid antagonist is prescribed to permit the applicant to prevent the opioid overdose of another person.

### **Bulletin 2019-02 – Addendum to “2019 Guide to Health Insurance for People with Medicare”**

This Bulletin was issued to provide a downloadable PDF version of the “Massachusetts Bulletin for People with Medicare” to be provided by carriers with the annual federal publication “Choosing a MediGap Policy: A Guide to Health Insurance for People with Medicare” to persons eligible for Medicare.

### **Bulletin 2019-03 – Guidance Regarding Open Enrollment Period for Benefit Year 2020**

This Bulletin was issued in collaboration with the Commonwealth Health Insurance Connector Authority to provide guidance to consumers regarding the 2020 open enrollment period and the special open enrollment for Massachusetts.

### **Bulletin 2019-04 – Copayments for Partial Fills of Opioid Products**

This Bulletin was issued to provide guidance to health carriers to ensure that people electing to partially fill a prescription for opioids not incur an additional payment obligation if the remaining portion of the prescription is filled at a later date.

### **Bulletin 2019-05 – Standing Orders for Naloxone**

This Bulletin was issued to health carriers to inform them of a new statewide standing order issued by the Department of Public Health permitting any licensed pharmacist to dispense opioid antagonists to any resident of MA to assist in controlling opioid overdoses.

#### Bulletin 2019-06 – Guidelines for Pain Management Alternatives to Opiate Products

This Bulletin was issued to health carriers to establish alternatives to opiate products for treating pain, including alternative medications and other treatment options, subject to medical necessity and the appropriateness of the prescribed treatment.

#### Bulletin 2019-07 – Common Procedure Coding Systems for Opioid Agonists and Antagonist Treatments

This Bulletin was issued to provide guidance to health carriers and providers in regard to common coding procedure to be used when submitting claims for agonist or opioid antagonist treatments in certain provider settings. Carriers must make available at least one opioid agonist treatment and one partial opioid agonist treatment without preauthorization for the treatment of opioid use disorder.

#### Bulletin 2019-08 – Updated Protocols for Prevention of Emergency Department boarding of Patients with Acute Behavioral Health and/or Substance Use Disorder Emergencies

This Bulletin was issued jointly with the Department of Mental Health and the Department of Public Health to provide information to health carriers of the three agencies' expectations regarding changes to health carriers' systems for coordinating inpatient admissions from emergency departments. Covered members may not spend extended time in emergency departments waiting to be admitted to an inpatient facility. The Bulletin sets out guidelines to coordinate the transfer of persons needing treatment for behavioral health and/or substance use disorders from an emergency department to an inpatient facility. The Bulletin updated and replaced Bulletin 2018-01.

#### Bulletin 2019-09 – Deviated Case Rates for Credit life and Credit Accident and Health Insurance Sold by Motor Vehicle Dealers effective Between January 1, 2020 and December 31, 2022

This Bulletin was issued to all insurers writing credit life and credit accident and health insurance that is sold by motor vehicle dealers informing them that the Commissioner shall review the combined experience of all insurers writing this business to compute the deviated case rates for these lines of business for policies issued or renewed between January 1, 2020 through December 31, 2022.

#### Bulletin 2019-10 – State and Federal Requirements that Carriers Cover Certain Tobacco Cessation Products Without Consumer Cost Sharing

This Bulletin was issued to health carriers to remind them that the law requires that certain covered benefits for tobacco cessation counseling and FDA-approved generic tobacco cessation products must be provided without cost sharing. This Bulletin updates and replaces Bulletin 2016-01 that was issued on January 19, 2016

## Appendix B: Select Financial Information from Massachusetts Domestic Insurance Companies

### Property & Casualty Insurance Companies

NAIC#	Company Name	Total Premium Written in MA 2019	Total Premium Written 2019	Total Net Assets as of 12/31/2019	Total Liabilities as of 12/31/2019	Total Surplus as of 12/31/2019
10017	Arbella Ind Ins Co	\$21,093,760	\$22,644,241	\$58,555,617	\$38,645,680	\$19,909,937
10206	Medical Professional Mut Ins Co	67,754,654	67,754,654	3,380,780,018	1,752,405,006	1,628,375,012
10394	Plymouth Rock Home Assur Corp	37,117,359	50,477,201	91,499,221	37,589,473	53,909,748
10664	Endeavour Ins Co	3,298,041	3,298,041	6,566,773	11,499	6,555,274
11104	Associated Employers Ins Co	38,267,233	40,159,097	6,648,861	491,631	6,157,230
11984	Independence Cas Ins Co	22,874,807	22,874,807	4,925,217	8,685	4,916,532
12154	Encompass Ins Co of MA	(28)	(28)	6,292,630	60,582	6,232,048
12725	New England Mut Ins Co	9,128,302	11,651,023	47,744,698	3,619,442	44,125,256
12808	Safety Prop & Cas Ins Co	25,294,267	26,000,339	51,735,219	27,874,121	23,861,099
12886	Massachusetts Employers Ins Co	14,233,288	14,233,288	4,561,099	750,134	3,810,965
13163	Hospitality Mut Ins Co	7,073,490	7,073,490	62,956,760	42,619,932	20,336,828
13374	Arrow Mut Liab Ins Co	6,211,179	6,586,965	58,027,842	25,937,056	32,090,786
13463	Barnstable Cnty Mut Ins Co	26,768,100	26,768,100	115,784,917	21,911,105	93,873,813
13643	Bunker Hill Ins Cas Co	9,918,320	9,918,320	26,221,665	15,298,041	10,923,624
13706	Dorchester Mut Ins Co	40,470,256	40,588,654	107,582,210	56,186,745	51,395,464
13943	Fitchburg Mut Ins Co	1,215	35,656,186	151,764,254	78,432,812	73,331,442
14192	Hingham Mut Fire Ins Co	10,494,934	10,494,934	72,918,232	23,665,418	49,252,814
14486	Liberty Mut Mid Atlantic Ins Co	-	181,127,130	21,565,117	25,688	21,539,430
14613	Montgomery Mut Ins Co	-	130,173,441	55,041,531	98,453	54,943,078
14737	Plymouth Rock Assur Corp	361,416,850	394,461,945	902,448,096	529,750,682	372,697,414
15067	Quincy Mut Fire Ins Co	167,197,176	220,647,029	1,882,930,731	648,347,205	1,234,583,526
16035	Bunker Hill Preferred Ins Co	8,243,651	8,243,651	25,515,219	15,181,310	10,333,909
16036	Bunker Hill Prop Ins Co	7,030,231	7,030,231	24,884,339	14,561,361	10,322,978
16037	Bunker Hill Ins Co	8,581,110	8,581,110	25,365,112	15,031,473	10,333,639
16375	AllWays Health Partners Ins Co	6,731,190	6,731,190	32,974,088	30,056,917	2,917,171
17000	Arbella Mut Ins Co	565,139,188	565,139,188	1,594,074,306	859,249,626	734,824,680
19763	Bay State Ins Co	61,273,238	90,047,026	635,526,307	231,357,230	404,169,078
19771	Cambridge Mut Fire Ins Co	14,570,020	128,936,387	1,132,298,242	493,100,195	639,198,046
19798	Merrimack Mut Fire Ins Co	152,888,874	366,565,907	1,862,379,770	703,775,582	1,158,604,189
21261	Electric Ins Co	23,535,101	258,443,615	1,242,205,989	847,423,348	394,782,641
21750	Pilgrim Ins Co	67,553,676	67,553,676	120,042,368	86,845,219	33,197,149
23043	Liberty Mut Ins Co	364,918,229	2,323,069,478	51,103,579,523	34,292,195,090	16,811,384,434
23965	Norfolk & Dedham Mut Fire Ins Co	172,277,599	180,644,297	496,700,552	259,906,603	236,793,949
31887	Coface N Amer Ins Co	2,577,511	118,693,906	156,391,086	106,971,870	49,419,217
33618	Safety Ind Ins Co	156,257,340	163,984,313	139,709,929	67,382,305	72,327,624
33758	Associated Industries Of MA Mut Ins	95,375,511	112,008,445	697,109,029	402,043,623	295,065,405
34754	Commerce Ins Co	1,510,396,683	1,537,801,694	2,184,845,078	1,570,410,283	614,434,795
37346	Danbury Ins Co	7,366,886	7,366,886	13,454,382	5,512,673	7,941,709
39454	Safety Ins Co	637,982,207	662,418,862	1,614,032,140	909,855,304	704,176,836
40274	Citation Ins Co	237,138,134	237,138,134	234,205,738	169,615,091	64,590,647
41360	Arbella Protection Ins Co	200,721,342	236,338,746	356,492,108	238,007,743	118,484,365
41955	Barnstable Cnty Ins Co	2,687,534	2,687,534	27,134,820	2,477,546	24,657,274
44326	Atlantic Charter Ins Co	33,909,088	41,782,962	170,646,556	101,602,611	69,043,945
<b>TOTAL</b>		<b>\$5,205,767,546</b>	<b>\$8,453,796,095</b>	<b>\$71,006,117,389</b>	<b>\$44,726,292,393</b>	<b>\$26,279,825,000</b>

## Life Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2019	Total Premium Written 2019	Total Net Assets as of 12/31/2019	Total Liabilities as of 12/31/2019	Total Surplus as of 12/31/2019
61476	Boston Mut Life Ins Co	\$40,356,616	\$179,362,297	\$1,529,501,927	\$1,283,602,164	\$245,899,763
65935	Massachusetts Mut Life Ins Co	243,340,644	9,281,062,467	268,249,285,895	249,356,375,724	18,892,910,171
66265	Monarch Life Ins Co	30,884	891,194	615,388,569	611,583,166	3,805,400
67598	Paul Revere Life Ins Co	404,080	13,788,413	3,213,512,467	3,040,342,942	173,169,525
69140	First Allmerica Fin Life Ins Co	613,438	56,562,386	3,233,830,907	2,988,196,149	245,634,758
70435	The Savings Bank Mut Life Ins Co	148,317,548	338,069,256	3,407,591,581	3,213,689,489	193,902,092
71714	Berkshire Life Ins Co of Amer	583,058	9,376,251	4,181,541,749	3,961,652,137	219,889,612
74920	Regal Reins Co	-	-	6,172,806	205,259	5,967,546
80896	Centre Life Ins Co	-	-	1,591,491,289	1,504,203,330	87,287,959
84824	Commonwealth Ann & Life Ins Co	2,415,949	46,768,407	23,125,955,201	20,280,118,738	2,845,836,463
91626	New England Life Ins Co	13,743,357	169,208,257	9,118,516,375	9,002,712,145	115,804,230
93610	John Hancock Life & Hlth Ins Co	42,998	698,584	16,068,034,070	14,959,195,407	1,108,838,663
<b>TOTAL</b>		<b>\$449,848,572</b>	<b>\$10,095,787,512</b>	<b>\$334,340,822,836</b>	<b>\$310,201,876,650</b>	<b>\$24,138,946,182</b>

## Health Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2019	Total Premium Written 2019	Total Net Assets as of 12/31/2019	Total Liabilities as of 12/31/2019	Total Surplus as of 12/31/2019
11109	Allways Hlth Partners Inc	\$793,172,269	\$793,172,269	\$276,614,743	\$115,861,854	\$160,752,888
12210	Dentegra Ins Co of New England	3,345,472	3,377,153	6,695,001	557,188	6,137,813
12219	BCBS of MA HMO Blue Inc	5,197,605,825	5,197,605,825	2,551,490,500	920,552,083	1,630,938,417
13203	Boston Medical Center Hlth Plan Inc	2,179,956,168	2,667,102,493	657,550,836	337,446,340	320,104,495
13632	Celticare Hlth Plan of MA Inc	164,421	164,421	16,505,749	9,744,452	6,761,294
14131	Tufts Hlth Public Plans Inc	2,168,212,175	2,219,049,805	767,664,310	437,151,442	330,512,868
14198	HNE Ins Co	1,781,276	1,781,276	5,664,189	587,811	5,076,378
15497	DSM MA Ins Co Inc	19,847,689	19,847,689	11,019,961	1,558,667	9,461,294
18975	HPHC Ins Co Inc	330,501,254	683,861,341	256,546,756	138,028,852	118,517,904
52060	Dental Serv of MA Inc	239,264,493	239,264,493	136,075,262	76,203,942	59,871,320
53228	BCBS of MA	3,188,827,499	3,188,827,499	2,466,338,983	1,645,876,827	820,462,156
60117	Tufts Ins Co Inc	290,012,563	315,524,735	132,040,727	57,936,688	74,104,038
66828	Fallon Hlth & Life Assur Co	22,859,858	22,859,858	25,310,687	19,303,702	6,006,985
95299	Connecticare Of MA Inc	1,274,540	1,274,540	4,426,838	1,640,904	2,785,934
95541	Fallon Comm Hlth Plan Inc	1,570,080,449	1,570,080,449	431,676,504	287,057,104	144,619,400
95673	Health New England Inc	726,044,820	730,311,817	227,813,369	140,830,236	86,983,133
95688	Tufts Associated Hlth Maintenance Organization	2,669,996,740	2,709,824,813	1,170,000,040	421,676,878	748,323,162
96717	Harvard Pilgrim Health Care New England	2,277,884	508,855,836	147,882,247	78,867,396	69,014,851
96911	Harvard Pilgrim Hlth Care Inc	1,253,981,399	1,684,850,084	1,056,552,105	418,545,187	638,006,918
<b>TOTAL</b>		<b>\$20,659,206,794</b>	<b>\$22,557,636,396</b>	<b>\$10,347,868,807</b>	<b>\$5,109,427,553</b>	<b>\$5,238,441,248</b>

## Fraternal Organizations

NAIC #	Company Name	Total Premium Written in MA 2019	Total Premium Written 2019	Total Net Assets as of 12/31/2019	Total Liabilities as of 12/31/2019
58130	Catholic Assn of Foresters	\$94,770	\$112,145	\$10,212,835	\$7,032,986
58181	Supreme Council of The Royal Arcanum	3,085,970	6,568,143	109,606,990	97,468,550
<b>TOTAL</b>		<b>\$3,180,740</b>	<b>\$6,680,288</b>	<b>\$119,819,825</b>	<b>\$104,501,536</b>

## Workers' Compensation Self-Insured Groups

Company Name	Premium Written 2019	Gross Premium Written 2019	Net Premium 12/31/2019	Total Net Assets as of 12/31/2019	Total Liabilities as of 12/31/2019	Total Surplus as of 12/31/19
ABC Massachusetts Workers Compensation Self-Insurance Group, Inc.	\$3,418,831	\$2,772,947	\$5,745,600	\$5,745,600	\$0	
Automotive Industries Compensation Corp	8,835,210	8,160,314	8,819,724	8,819,724	0	
Commonwealth Manufacturers Compensation Corp (runoff since 1/1/1996)	0	0	101,565	101,566	0	
Commonwealth Transportation Compensation Corp (runoff since 1/31/2016)	0	0	689,205	689,205	0	
Independent Schools Compensation Corp	10,076,818	9,719,204	23,824,870	23,824,870	0	
Manufacturers of Massachusetts Compensation Group (runoff since 1/1/2012)	0	0	1,288,820	1,293,356	-4,536	(4,536)
Massachusetts Bay Self-Insurance Group, Inc.	2,835,972	2,486,471	7,155,752	5,518,820	1,636,932	1,636,932
Massachusetts Care Self-Insurance Group, Inc.	5,619,146	5,223,732	6,377,127	6,819,859	-442,732	(442,732)
Massachusetts Catholic Self-Insurance Group, Inc. Y/E- 3/31/2019	3,756,380	3,487,583	15,020,902	5,403,249	9,617,653	9,617,653
Massachusetts Education & Government Assn. P-C Group (MEGA) Y/E- 6/30/2019	15,464,999	14,678,594	28,195,639	22,504,640	5,690,999	5,690,999
Massachusetts Healthcare Self-Insurance Group, Inc.	7,332,534	6,524,966	6,184,245	6,184,245	0	
Massachusetts High Technology Self-Insurance Group (runoff 1/1/2020)	552,145	410,475	1,335,744	1,335,744	0	
Massachusetts Manufacturing Self-Insurance Group, Inc.	3,810,989	3,474,253	7,725,804	7,625,804	100,000	100,000
Massachusetts McDonald's Operators Workers' Compensation Group, Inc.	1,967,220	1,786,550	3,471,667	3,471,667	0	
Massachusetts NAHRO Insurance Group, Inc.	5,121,324	4,218,102	11,442,209	8,991,274	2,450,935	2,450,935
Massachusetts Retail Merchants Workers' Comp. Self-Insurance Group, Inc.	21,576,572	19,896,177	37,147,032	37,147,032	0	
Massachusetts Trade Self-Insurance Group, Inc.	6,833,280	6,003,506	9,532,869	9,532,869	0	
MIIA Property-Casualty Group, Inc. Y/E- 6/30/2019	87,962,104	65,689,490	294,654,026	165,910,188	128,743,838	128,743,838
NEEIA Compensation, Inc.	7,828,854	7,472,701	25,935,550	25,935,550	0	
Self Insured Lumber Businesses Assn, Inc. (STAM) School Transportation Assn. of MA	4,996,207	4,387,042	6,928,672	6,886,705	41,967	41,967
Self-Insurance Group, Inc.	4,270,517	3,803,778	6,552,314	6,552,314	0	
Wholesale/Retail Suppliers Compensation Corporation (runoff since 1/1/2010)	0	0	166,212	166,212	0	
<b>TOTAL</b>		<b>\$202,259,102</b>	<b>\$170,195,885</b>	<b>\$508,295,548</b>	<b>\$360,460,493</b>	<b>147,835,056</b>

## Appendix C: 2019 Direct Written Premium by Line of Insurance

### ACCIDENT & HEALTH INSURANCE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
79413	UNITEDHEALTHCARE INS CO	CT	1,362,238,602	35.48%
67369	CIGNA HLTH & LIFE INS CO	CT	329,193,545	8.57%
60054	AETNA LIFE INS CO	CT	298,832,175	7.78%
65978	METROPOLITAN LIFE INS CO	NY	232,593,776	6.06%
62235	UNUM LIFE INS CO OF AMER	ME	175,508,581	4.57%
64246	GUARDIAN LIFE INS CO OF AMER	NY	92,218,070	2.40%
80802	US BR SUN LIFE ASSUR CO OF CANADA	MI	91,192,461	2.37%
70025	GENWORTH LIFE INS CO	DE	69,695,088	1.82%
65315	LINCOLN LIFE ASSUR CO OF BOSTON	NH	68,706,016	1.79%
60380	AMERICAN FAMILY LIFE ASSUR CO OF COL	NE	58,963,328	1.54%
65838	JOHN HANCOCK LIFE INS CO USA	MI	56,305,511	1.47%
68241	PRUDENTIAL INS CO OF AMER	NJ	53,939,542	1.40%
65498	LIFE INS CO OF N AMER	PA	52,414,861	1.37%
70815	HARTFORD LIFE & ACCIDENT INS CO	CT	49,675,789	1.29%
62049	COLONIAL LIFE & ACCIDENT INS CO	SC	48,535,609	1.26%
68381	RELIANCE STANDARD LIFE INS CO	IL	43,432,719	1.13%
61271	PRINCIPAL LIFE INS CO	IA	40,575,548	1.06%
69019	STANDARD INS CO	OR	35,116,758	0.91%
67091	NORTHWESTERN MUT LIFE INS CO	WI	33,907,741	0.88%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	33,625,138	0.88%

Total Companies Writing in MA	226
Top 20 Companies	\$3,226,670,858
Direct Written Premium	84.0%
Remaining Companies	\$613,061,152
Direct Written Premium	16.0%
Total Direct Written Premium	\$3,839,732,010

### **AIRCRAFT (ALL PERILS)**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
38318	STARR IND & LIAB CO	TX	3,674,757	19.22%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	2,107,599	11.02%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	1,689,540	8.84%
20052	NATIONAL LIAB & FIRE INS CO	CT	1,442,241	7.54%
22667	ACE AMER INS CO	PA	1,442,234	7.54%
24147	OLD REPUBLIC INS CO	PA	1,204,418	6.30%
10641	ENDURANCE AMER INS CO	DE	1,154,156	6.04%
19720	AMERICAN ALT INS CORP	DE	892,330	4.67%
39217	QBE INS CORP	PA	716,837	3.75%
16691	GREAT AMER INS CO	OH	695,509	3.64%
37885	XL SPECIALTY INS CO	DE	637,558	3.33%
10945	TOKIO MARINE AMER INS CO	NY	464,569	2.43%
34274	CENTRAL STATES IND CO OF OMAHA	NE	429,274	2.25%
20362	MTSUI SUMITOMO INS CO OF AMER	NY	315,395	1.65%
10367	AVEMCO INS CO	MD	306,837	1.61%
33022	AXA INS CO	NY	261,822	1.37%
29700	NORTH AMER ELITE INS CO	NH	237,724	1.24%
29599	US SPECIALTY INS CO	TX	237,296	1.24%
34037	HALLMARK INS CO	AZ	232,032	1.21%
19410	COMMERCE & INDUSTRY INS CO	NY	212,327	1.11%

Total Companies Writing in MA	28
Top 20 Companies	\$18,354,455
Direct Written Premium	96.0%
Remaining Companies	\$762,943
Direct Written Premium	4.0%
Total Direct Written Premium	\$19,117,398

## ANNUITIES

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	598,697,647	7.08%
65056	JACKSON NATL LIFE INS CO	MI	575,376,239	6.80%
65676	LINCOLN NATL LIFE INS CO	IN	568,074,949	6.72%
91596	NEW YORK LIFE INS & ANN CORP	DE	561,417,813	6.64%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	491,524,146	5.81%
86509	VOYA RETIREMENT INS & ANN CO	CT	431,420,893	5.10%
62944	AXA EQUITABLE LIFE INS CO	NY	328,371,419	3.88%
61689	ATHENE ANN & LIFE CO	IA	298,823,157	3.53%
60488	AMERICAN GEN LIFE INS CO	TX	274,377,921	3.24%
66869	NATIONWIDE LIFE INS CO	OH	263,445,372	3.11%
90611	ALLIANZ LIFE INS CO OF N AMER	MN	253,900,111	3.00%
91642	FORETHOUGHT LIFE INS CO	IN	238,492,573	2.82%
92657	NATIONWIDE LIFE & ANN INS CO	OH	197,408,052	2.33%
65005	RIVERSOURCE LIFE INS CO	MN	179,741,332	2.12%
67466	PACIFIC LIFE INS CO	NE	177,643,300	2.10%
68241	PRUDENTIAL INS CO OF AMER	NJ	177,102,562	2.09%
61271	PRINCIPAL LIFE INS CO	IA	173,162,316	2.05%
79227	PRUCO LIFE INS CO	AZ	158,846,974	1.88%
87726	BRIGHTHOUSE LIFE INS CO	DE	156,632,172	1.85%
68675	SECURITY BENEFIT LIFE INS CO	KS	152,215,193	1.80%
Total Companies Writing in MA				184
Top 20 Companies			\$6,256,674,141	
Direct Written Premium				74.0%
Remaining Companies			\$2,201,905,780	
Direct Written Premium				26.0%
Total Direct Written Premium			\$8,458,579,921	



## **BOILER & MACHINERY**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
21482	FACTORY MUT INS CO	RI	10,902,158	30.33%
20281	FEDERAL INS CO	IN	3,083,657	8.58%
25674	TRAVELERS PROP CAS CO OF AMER	CT	2,367,476	6.59%
10014	AFFILIATED FM INS CO	RI	1,842,831	5.13%
20443	CONTINENTAL CAS CO	IL	1,502,176	4.18%
26247	AMERICAN GUAR & LIAB INS	NY	990,179	2.75%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	951,256	2.65%
29700	NORTH AMER ELITE INS CO	NH	906,944	2.52%
16535	ZURICH AMER INS CO	NY	889,354	2.47%
43001	NARRAGANSETT BAY INS CO	RI	833,488	2.32%
24554	XL INS AMER INC	DE	795,427	2.21%
25658	TRAVELERS IND CO	CT	791,797	2.20%
11452	HARTFORD STEAM BOIL INSPEC & INS CO	CT	776,082	2.16%
20303	GREAT NORTHERN INS CO	IN	749,653	2.09%
23035	LIBERTY MUT FIRE INS CO	WI	676,928	1.88%
19259	SELECTIVE INS CO OF SC	IN	617,549	1.72%
31325	ACADIA INS CO	IA	467,642	1.30%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	455,302	1.27%
25844	UNION INS CO	IA	394,378	1.10%
20397	VIGILANT INS CO	NY	374,430	1.04%

Total Companies Writing in MA	120
Top 20 Companies	\$30,368,707
Direct Written Premium	84.5%
Remaining Companies	\$5,577,395
Direct Written Premium	15.5%
Total Direct Written Premium	\$35,946,102

## **BURGLARY & THEFT**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	3,690,132	37.60%
20281	FEDERAL INS CO	IN	1,034,747	10.54%
10200	HISCOX INS CO INC	IL	979,000	9.98%
16535	ZURICH AMER INS CO	NY	608,976	6.21%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	484,655	4.94%
37885	XL SPECIALTY INS CO	DE	473,706	4.83%
22292	HANOVER INS CO	NH	392,533	4.00%
20443	CONTINENTAL CAS CO	IL	371,757	3.79%
29700	NORTH AMER ELITE INS CO	NH	176,366	1.80%
29599	US SPECIALTY INS CO	TX	163,789	1.67%
32603	BERKLEY INS CO	DE	148,928	1.52%
10030	WESTCHESTER FIRE INS CO	PA	138,318	1.41%
29459	TWIN CITY FIRE INS CO	IN	115,619	1.18%
10120	EVEREST NATL INS CO	DE	94,059	0.96%
23647	IRONSHORE IND INC	MN	87,708	0.89%
18058	PHILADELPHIA IND INS CO	PA	85,337	0.87%
20346	PACIFIC IND CO	WI	67,697	0.69%
24554	XL INS AMER INC	DE	66,681	0.68%
19682	HARTFORD FIRE INS CO	CT	59,428	0.61%
27154	ATLANTIC SPECIALTY INS CO	NY	49,300	0.50%

Total Companies Writing in MA	101
Top 20 Companies	\$9,288,736
Direct Written Premium	94.7%
Remaining Companies	\$524,838
Direct Written Premium	5.3%
Total Direct Written Premium	\$9,813,574

## COMMERCIAL AUTO

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	126,437,899	13.01%
39454	SAFETY INS CO	MA	96,385,813	9.91%
41360	ARBELLA PROTECTION INS CO	MA	94,766,249	9.75%
21750	PILGRIM INS CO	MA	48,109,779	4.95%
33618	SAFETY IND INS CO	MA	40,809,936	4.20%
18058	PHILADELPHIA IND INS CO	PA	39,137,994	4.03%
24260	PROGRESSIVE CAS INS CO	OH	24,292,735	2.50%
16535	ZURICH AMER INS CO	NY	21,582,430	2.22%
41840	ALLMERICA FIN BENEFIT INS CO	MI	21,400,297	2.20%
19046	TRAVELERS CAS INS CO OF AMER	CT	19,647,651	2.02%
31325	ACADIA INS CO	IA	17,821,487	1.83%
24082	OHIO SECURITY INS CO	NH	15,228,102	1.57%
14788	NGM INS CO	FL	14,480,501	1.49%
23035	LIBERTY MUT FIRE INS CO	WI	14,461,328	1.49%
25658	TRAVELERS IND CO	CT	13,122,247	1.35%
40274	CITATION INS CO	MA	12,022,593	1.24%
25615	CHARTER OAK FIRE INS CO	CT	11,983,365	1.23%
32620	NATIONAL INTERSTATE INS CO	OH	11,808,613	1.21%
25674	TRAVELERS PROP CAS CO OF AMER	CT	9,705,989	1.00%
11770	UNITED FINANCIAL CAS CO	OH	9,551,740	0.98%

Total Companies Writing in MA	200
Top 20 Companies	\$662,756,748
Direct Written Premium	68.2%
Remaining Companies	\$309,434,727
Direct Written Premium	31.8%
Total Direct Written Premium	\$972,191,475

## COMMERCIAL MULTI-PERIL

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
18058	PHILADELPHIA IND INS CO	PA	81,552,588	6.44%
41360	ARBELLA PROTECTION INS CO	MA	80,733,017	6.37%
25992	NORTHERN SECURITY INS CO INC	VT	73,692,346	5.82%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	59,643,020	4.71%
20281	FEDERAL INS CO	IN	45,029,179	3.55%
24082	OHIO SECURITY INS CO	NH	39,540,803	3.12%
31534	CITIZENS INS CO OF AMER	MI	36,489,681	2.88%
19046	TRAVELERS CAS INS CO OF AMER	CT	27,287,570	2.15%
25623	PHOENIX INS CO	CT	26,759,618	2.11%
29939	MAIN ST AMER ASSUR CO	FL	26,434,855	2.09%
15067	QUINCY MUT FIRE INS CO	MA	26,048,252	2.06%
25674	TRAVELERS PROP CAS CO OF AMER	CT	23,503,852	1.86%
22292	HANOVER INS CO	NH	23,293,671	1.84%
25666	TRAVELERS IND CO OF AMER	CT	22,631,982	1.79%
26018	VERMONT MUT INS CO	VT	22,345,974	1.76%
23876	MAPFRE INS CO	NJ	21,633,021	1.71%
22306	MASSACHUSETTS BAY INS CO	NH	21,166,363	1.67%
29459	TWIN CITY FIRE INS CO	IN	20,872,035	1.65%
25615	CHARTER OAK FIRE INS CO	CT	20,871,190	1.65%
19720	AMERICAN ALT INS CORP	DE	18,354,596	1.45%

Total Companies Writing in MA	216
Top 20 Companies	\$717,883,613
Direct Written Premium	56.7%
Remaining Companies	\$549,080,310
Direct Written Premium	43.3%
Total Direct Written Premium	\$1,266,963,923

## CREDIT

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
27154	ATLANTIC SPECIALTY INS CO	NY	7,325,205	18.97%
16691	GREAT AMER INS CO	OH	7,134,094	18.48%
20516	EULER HERMES N AMER INS CO	MD	5,825,234	15.09%
26565	OHIO IND CO	OH	3,738,773	9.68%
26344	GREAT AMER ASSUR CO	OH	3,150,683	8.16%
31887	COFACE N AMER INS CO	MA	2,577,511	6.68%
25422	ATRADIUS TRADE CREDIT INS CO	MD	1,986,290	5.14%
29980	FIRST COLONIAL INS CO	FL	1,273,577	3.30%
11150	ARCH INS CO	MO	1,228,682	3.18%
39217	QBE INS CORP	PA	1,221,195	3.16%
25011	WESCO INS CO	DE	938,409	2.43%
23728	NATIONAL GEN INS CO	MO	749,763	1.94%
29599	US SPECIALTY INS CO	TX	599,280	1.55%
24147	OLD REPUBLIC INS CO	PA	316,240	0.82%
20699	ACE PROP & CAS INS CO	PA	294,447	0.76%
10847	CUMIS INS SOCIETY INC	IA	123,840	0.32%
10111	AMERICAN BANKERS INS CO OF FL	FL	51,258	0.13%
22667	ACE AMER INS CO	PA	49,055	0.13%
16667	UNITED GUAR RESIDENTIAL INS CO OF NC	NC	15,970	0.04%
34274	CENTRAL STATES IND CO OF OMAHA	NE	5,300	0.01%

Total Companies Writing in MA	22
Top 20 Companies	\$38,604,806
Direct Written Premium	100.0%
Remaining Companies	\$5,216
Direct Written Premium	0.0%
Total Direct Written Premium	\$38,610,022

## DEPOSIT FUNDS

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
86509	VOYA RETIREMENT INS & ANN CO	CT	570,454,049	35.86%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	353,225,917	22.21%
61271	PRINCIPAL LIFE INS CO	IA	181,606,081	11.42%
65056	JACKSON NATL LIFE INS CO	MI	101,273,962	6.37%
93629	PRUDENTIAL RETIREMENT INS & ANN CO	CT	68,868,336	4.33%
69868	UNITED OF OMAHA LIFE INS CO	NE	55,477,747	3.49%
60488	AMERICAN GEN LIFE INS CO	TX	53,387,510	3.36%
69019	STANDARD INS CO	OR	40,145,396	2.52%
88072	TALCOTT RESOLUTION LIFE INS CO	CT	19,380,532	1.22%
58033	KNIGHTS OF COLUMBUS	CT	17,759,373	1.12%
70238	VARIABLE ANN LIFE INS CO	TX	16,914,703	1.06%
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	16,145,495	1.02%
91596	NEW YORK LIFE INS & ANN CORP	DE	13,841,974	0.87%
92622	WESTERN SOUTHERN LIFE ASSUR CO	OH	9,546,457	0.60%
67172	OHIO NATL LIFE INS CO	OH	9,539,659	0.60%
66583	NATIONAL GUARDIAN LIFE INS CO	WI	7,039,495	0.44%
68241	PRUDENTIAL INS CO OF AMER	NJ	7,008,923	0.44%
91642	FORETHOUGHT LIFE INS CO	IN	5,881,616	0.37%
60142	TIAA CREF LIFE INS CO	NY	3,485,669	0.22%
60054	AETNA LIFE INS CO	CT	3,361,043	0.21%

Total Companies Writing in MA	83
Top 20 Companies	\$1,554,343,937
Direct Written Premium	97.7%
Remaining Companies	\$36,267,766
Direct Written Premium	2.3%
Total Direct Written Premium	\$1,590,611,703

### **FIDELITY & SURETY**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
23043	LIBERTY MUT INS CO	MA	29,531,198	14.29%
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	27,723,240	13.42%
20281	FEDERAL INS CO	IN	18,686,661	9.04%
13188	WESTERN SURETY CO	SD	17,258,531	8.35%
39306	FIDELITY & DEPOSIT CO OF MD	IL	16,331,460	7.90%
29874	NORTH AMER SPECIALTY INS CO	NH	5,530,813	2.68%
16691	GREAT AMER INS CO	OH	4,826,866	2.34%
24074	OHIO CAS INS CO	NH	4,595,176	2.22%
22292	HANOVER INS CO	NH	4,271,392	2.07%
14788	NGM INS CO	FL	3,939,636	1.91%
19682	HARTFORD FIRE INS CO	CT	3,833,863	1.86%
18058	PHILADELPHIA IND INS CO	PA	3,782,602	1.83%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	3,693,072	1.79%
27154	ATLANTIC SPECIALTY INS CO	NY	3,517,943	1.70%
32603	BERKLEY INS CO	DE	3,348,965	1.62%
11150	ARCH INS CO	MO	3,321,664	1.61%
36226	UNITED CAS & SURETY INS CO	NE	2,728,443	1.32%
20443	CONTINENTAL CAS CO	IL	2,365,010	1.14%
11592	INTERNATIONAL FIDELITY INS CO	NJ	2,176,852	1.05%
10030	WESTCHESTER FIRE INS CO	PA	2,088,714	1.01%

Total Companies Writing in MA	168
Top 20 Companies	\$163,552,101
Direct Written Premium	79.2%
Remaining Companies	\$43,046,390
Direct Written Premium	20.8%
Total Direct Written Premium	\$206,598,491

## FIRE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	23,128,816	9.03%
21482	FACTORY MUT INS CO	RI	15,421,950	6.02%
19798	MERRIMACK MUT FIRE INS CO	MA	14,863,856	5.80%
26018	VERMONT MUT INS CO	VT	14,781,358	5.77%
29700	NORTH AMER ELITE INS CO	NH	13,788,793	5.38%
10014	AFFILIATED FM INS CO	RI	13,085,819	5.11%
25658	TRAVELERS IND CO	CT	9,855,985	3.85%
13604	STARR SURPLUS LINES INS CO	TX	9,181,459	3.58%
42978	AMERICAN SECURITY INS CO	DE	7,884,058	3.08%
16535	ZURICH AMER INS CO	NY	7,656,034	2.99%
23035	LIBERTY MUT FIRE INS CO	WI	6,550,114	2.56%
24554	XL INS AMER INC	DE	5,939,766	2.32%
11185	FOREMOST INS CO GRAND RAPIDS MI	MI	5,691,774	2.22%
17000	ARBELLA MUT INS CO	MA	5,565,098	2.17%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	5,106,463	1.99%
26298	METROPOLITAN PROP & CAS INS CO	RI	4,683,246	1.83%
13803	FARM FAMILY CAS INS CO	NY	4,541,559	1.77%
26247	AMERICAN GUAR & LIAB INS	NY	4,462,762	1.74%
39454	SAFETY INS CO	MA	4,458,906	1.74%
25674	TRAVELERS PROP CAS CO OF AMER	CT	4,074,832	1.59%

Total Companies Writing in MA	189
Top 20 Companies	\$180,722,648
Direct Written Premium	70.5%
Remaining Companies	\$75,472,329
Direct Written Premium	29.5%
Total Direct Written Premium	\$256,194,977



## FRATERNALS

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
58033	Knights Of Columbus	CT	51,327,309	59.13%
56014	Thrivent Financial For Lutherans	WI	16,403,676	18.90%
58068	Independent Order Of Foresters Us Br	NY	9,283,400	10.69%
58181	Supreme Council The Royal Arcanum	MA	3,076,392	3.54%
57541	Modern Woodmen Of Amer	IL	2,315,391	2.67%
57010	William Penn Assn	PA	861,556	0.99%
57967	Luso Amer Life Ins Society	CA	690,033	0.79%
57487	Catholic Order Of Foresters	IL	667,404	0.77%
57622	Polish Natl Alliance Us Of Na	IL	637,935	0.73%
56030	Catholic Financial Life	WI	513,180	0.59%
57770	Catholic Holy Family Society	IL	350,411	0.40%
57320	Woodmen World Life Ins Soc	NE	213,085	0.25%
56820	Polish Falcons Of Amer	PA	113,435	0.13%
56758	Loyal Christian Benefit Assn	PA	100,238	0.12%
58130	Catholic Assn Of Foresters	MA	94,626	0.11%
57142	Sons Of Norway	MN	54,178	0.06%
57215	Ukrainian Natl Assn Inc	NJ	34,927	0.04%
57630	Polish Roman Catholic Union Of Amer	IL	34,593	0.04%
56340	First Cath Slovak Union Of US & CN	OH	10,101	0.01%
57193	Slovak Catholic Sokol	NJ	6,755	0.01%

Total Companies Writing in MA	24
Top 20 Companies	\$86,788,625
Direct Written Premium	100.0%
Remaining Companies	\$16,019
Direct Written Premium	0.0%
Total Direct Written Premium	\$86,804,644

## HEALTH

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
12219	BCBS OF MA HMO BLUE INC	MA	5,197,605,825	24.41%
53228	BCBS OF MA	MA	3,188,827,499	14.98%
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	MA	2,669,996,740	12.54%
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	MA	2,179,956,168	10.24%
14131	TUFTS HLTH PUBLIC PLANS INC	MA	2,168,212,175	10.18%
95541	FALLON COMM HLTH PLAN INC	MA	1,570,080,450	7.37%
96911	HARVARD PILGRIM HLTH CARE INC	MA	1,253,981,399	5.89%
11109	ALLWAYS HLTH PARTNERS INC	MA	793,172,269	3.73%
95673	HEALTH NEW ENGLAND INC	MA	731,177,095	3.43%
18975	HPHC INS CO INC	MA	330,501,254	1.55%
60117	TUFTS INS CO INC	MA	290,026,577	1.36%
52060	DENTAL SERV OF MA INC	MA	239,264,493	1.12%
95149	UNITEDHEALTHCARE OF NEW ENGLAND INC	RI	207,460,229	0.97%
12575	SILVERSCRIPT INS CO	TN	93,593,911	0.44%
73288	HUMANA INS CO	WI	80,810,376	0.38%
10155	WELLCARE PRESCRIPTION INS INC	FL	74,186,550	0.35%
52632	ALTUS DENTAL INS CO INC	RI	71,620,113	0.34%
39616	VISION SERV PLAN INS CO	OH	41,774,303	0.20%
66828	FALLON HLTH & LIFE ASSUR CO	MA	22,859,859	0.11%
15497	DSM MA INS CO INC	MA	19,847,689	0.09%

Total Companies Writing in MA	33
Top 20 Companies	\$21,224,954,974
Direct Written Premium	99.7%
Remaining Companies	\$68,118,538
Direct Written Premium	0.3%
Total Direct Written Premium	\$21,293,073,512

## HOMEOWNER'S MULTI-PERIL

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
40274	CITATION INS CO	MA	212,216,621	8.34%
17000	ARBELLA MUT INS CO	MA	129,495,449	5.09%
34754	COMMERCE INS CO	MA	124,238,604	4.88%
33618	SAFETY IND INS CO	MA	106,747,561	4.20%
19976	AMICA MUT INS CO	RI	106,360,493	4.18%
19798	MERRIMACK MUT FIRE INS CO	MA	99,119,673	3.90%
26018	VERMONT MUT INS CO	VT	92,308,885	3.63%
23035	LIBERTY MUT FIRE INS CO	WI	75,328,441	2.96%
36447	LM GEN INS CO	IL	67,443,737	2.65%
43001	NARRAGANSETT BAY INS CO	RI	59,295,603	2.33%
23043	LIBERTY MUT INS CO	MA	54,233,060	2.13%
39454	SAFETY INS CO	MA	54,016,170	2.12%
26298	METROPOLITAN PROP & CAS INS CO	RI	53,896,323	2.12%
10969	UNITED PROP & CAS INS CO	FL	50,984,102	2.00%
15067	QUINCY MUT FIRE INS CO	MA	49,697,786	1.95%
19763	BAY STATE INS CO	MA	49,569,489	1.95%
31534	CITIZENS INS CO OF AMER	MI	47,424,787	1.86%
25941	UNITED SERV AUTOMOBILE ASSN	TX	45,068,263	1.77%
20346	PACIFIC IND CO	WI	44,782,301	1.76%
15024	PREFERRED MUT INS CO	NY	44,586,266	1.75%

Total Companies Writing in MA	162
Top 20 Companies	\$1,566,813,614
Direct Written Premium	61.6%
Remaining Companies	\$977,583,679
Direct Written Premium	38.4%
Total Direct Written Premium	\$2,544,397,293

## LIABILITY OTHER THAN AUTO

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
20281	FEDERAL INS CO	IN	117,934,661	7.32%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	95,637,956	5.93%
37885	XL SPECIALTY INS CO	DE	69,803,820	4.33%
20443	CONTINENTAL CAS CO	IL	68,615,911	4.26%
22667	ACE AMER INS CO	PA	61,165,635	3.79%
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	45,403,963	2.82%
25674	TRAVELERS PROP CAS CO OF AMER	CT	42,350,488	2.63%
16535	ZURICH AMER INS CO	NY	41,033,773	2.55%
18058	PHILADELPHIA IND INS CO	PA	35,262,669	2.19%
22292	HANOVER INS CO	NH	27,655,587	1.72%
38318	STARR IND & LIAB CO	TX	25,646,946	1.59%
11150	ARCH INS CO	MO	25,034,087	1.55%
10641	ENDURANCE AMER INS CO	DE	24,384,507	1.51%
23035	LIBERTY MUT FIRE INS CO	WI	22,557,149	1.40%
37540	BEAZLEY INS CO INC	CT	22,535,600	1.40%
10120	EVEREST NATL INS CO	DE	22,259,894	1.38%
26247	AMERICAN GUAR & LIAB INS	NY	21,477,846	1.33%
37273	AXIS INS CO	IL	21,389,511	1.33%
29599	US SPECIALTY INS CO	TX	19,829,806	1.23%
19801	ARGONAUT INS CO	IL	18,628,159	1.16%

Total Companies Writing in MA	355
Top 20 Companies	\$828,607,968
Direct Written Premium	51.4%
Remaining Companies	\$783,577,033
Direct Written Premium	48.6%
Total Direct Written Premium	\$1,612,185,001

# LIFE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65676	Lincoln Natl Life Ins Co	IN	407,535,698	9.70%
67091	Northwestern Mut Life Ins Co	WI	310,739,926	7.40%
66915	New York Life Ins Co	NY	251,380,473	5.98%
65935	Massachusetts Mut Life Ins Co	MA	243,340,644	5.79%
65978	Metropolitan Life Ins Co	NY	221,755,326	5.28%
65838	John Hancock Life Ins Co USA	MI	182,481,321	4.34%
64246	Guardian Life Ins Co Of Amer	NY	170,794,709	4.06%
70435	The Savings Bank Mut Life Ins Co of	MA	148,317,548	3.53%
79227	Pruco Life Ins Co	AZ	131,021,278	3.12%
68241	Prudential Ins Co Of Amer	NJ	115,161,096	2.74%
91596	New York Life Ins & Ann Corp	DE	94,632,717	2.25%
87726	Brighthouse Life Ins Co	DE	88,564,750	2.11%
65315	Lincoln Life Assur Co of Boston	NH	84,439,954	2.01%
70815	Hartford Life & Accident Ins Co	CT	81,139,402	1.93%
66168	Minnesota Life Ins Co	MN	61,992,713	1.48%
60488	American Gen Life Ins Co	TX	58,162,160	1.38%
62235	Unum Life Ins Co Of Amer	ME	54,197,514	1.29%
67466	Pacific Life Ins Co	NE	52,451,007	1.25%
69868	United Of Omaha Life Ins Co	NE	49,908,316	1.19%
65005	RiverSource Life Ins Co	MN	48,500,064	1.15%

Total Companies Writing in MA	309
Top 20 Companies	\$2,856,516,616
Direct Written Premium	68.0%
Remaining Companies	\$1,345,098,396
Direct Written Premium	32.0%
Total Direct Written Premium	\$4,201,615,012

### **LIFE ALL LINES**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	Massachusetts Mut Life Ins Co	MA	1,931,700,021	10.91%
65978	Metropolitan Life Ins Co	NY	1,241,801,662	7.01%
86509	Voya Retirement Ins & Ann Co	CT	1,055,951,600	5.96%
65676	Lincoln Natl Life Ins Co	IN	975,610,647	5.51%
65838	John Hancock Life Ins Co USA	MI	919,175,848	5.19%
65056	Jackson Natl Life Ins Co	MI	691,310,788	3.90%
91596	New York Life Ins & Ann Corp	DE	669,892,504	3.78%
69345	Teachers Ins & Ann Assoc Of Amer	NY	627,622,806	3.54%
68241	Prudential Ins Co Of Amer	NJ	425,694,726	2.40%
60488	American Gen Life Ins Co	TX	385,927,591	2.18%
61271	Principal Life Ins Co	IA	370,812,678	2.09%
66915	New York Life Ins Co	NY	367,157,795	2.07%
67091	Northwestern Mut Life Ins Co	WI	366,700,373	2.07%
62944	AXA Equitable Life Ins Co	NY	359,008,092	2.03%
86231	Transamerica Life Ins Co	IA	343,087,127	1.94%
61689	Athene Ann & Life Co	IA	300,629,815	1.70%
79227	Pruco Life Ins Co	AZ	291,167,400	1.64%
66869	Nationwide Life Ins Co	OH	277,439,061	1.57%
90611	Allianz Life Ins Co Of N Amer	MN	263,086,430	1.49%
91642	Forethought Life Ins Co	IN	248,781,501	1.41%

Total Companies Writing in MA	317
Top 20 Companies	\$12,112,558,465
Direct Written Premium	68.4%
Remaining Companies	\$5,592,851,069
Direct Written Premium	31.6%
Total Direct Written Premium	\$17,705,409,534

## LIFE / OTHER FUNDS

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65978	Metropolitan Life Ins Co	NY	973,804,564	28.19%
65935	Massachusetts Mut Life Ins Co	MA	843,609,314	24.42%
65838	John Hancock Life Ins Co USA	MI	733,693,648	21.24%
86231	Transamerica Life Ins Co	IA	195,750,166	5.67%
93629	Prudential Retirement Ins & Ann Co	CT	138,554,657	4.01%
68241	Prudential Ins Co Of Amer	NJ	126,422,145	3.66%
66915	New York Life Ins Co	NY	90,194,994	2.61%
70688	Transamerica Financial Life Ins Co	NY	79,054,626	2.29%
86509	Voya Retirement Ins & Ann Co	CT	52,339,173	1.51%
88668	Mutual Of Amer Life Ins Co	NY	52,219,937	1.51%
69019	Standard Ins Co	OR	50,885,373	1.47%
62626	CMFG Life Ins Co	IA	33,210,527	0.96%
66168	Minnesota Life Ins Co	MN	29,077,606	0.84%
88072	Talcott Resolution Life Ins Co	CT	25,445,046	0.74%
66281	Transamerica Premier Life Ins Co	IA	22,523,787	0.65%
62944	AXA Equitable Life Ins Co	NY	4,160,405	0.12%
67172	Ohio Natl Life Ins Co	OH	2,988,863	0.09%
71153	Talcott Resolution Life & Ann Ins Co	CT	540,226	0.02%
78778	Guardian Ins & Ann Co Inc	DE	453,047	0.01%

Total Companies Writing in MA	19
Top 20 Companies	\$3,454,928,104
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$3,454,928,104

## MEDICAL MALPRACTICE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
10206	MEDICAL PROFESSIONAL MUT INS CO	MA	66,883,971	56.69%
11843	MEDICAL PROTECTIVE CO	IN	14,728,924	12.48%
20427	AMERICAN CAS CO OF READING PA	PA	8,043,995	6.82%
15890	CONNECTICUT MEDICAL INS CO	CT	6,621,098	5.61%
34495	DOCTORS CO AN INTERINS EXCH	CA	4,766,357	4.04%
10638	PROSELECT INS CO	NE	3,734,370	3.17%
42617	MAG MUT INS CO	GA	2,465,834	2.09%
14460	PROASSURANCE INS CO OF AMER	IL	1,748,268	1.48%
19917	LIBERTY INS UNDERWRITERS INC	IL	1,664,773	1.41%
22667	ACE AMER INS CO	PA	1,559,250	1.32%
36277	MEDICAL MUT INS CO OF ME	ME	1,483,346	1.26%
15865	NCMIC INS CO	IA	1,322,158	1.12%
35157	FAIR AMER INS & REINS CO	NY	829,824	0.70%
22730	ALLIED WORLD INS CO	NH	382,822	0.32%
10801	FORTRESS INS CO	IL	301,509	0.26%
13714	PHARMACISTS MUT INS CO	IA	285,009	0.24%
43460	ASPEN AMER INS CO	TX	225,910	0.19%
19720	AMERICAN ALT INS CORP	DE	223,043	0.19%
18767	CHURCH MUT INS CO	WI	186,013	0.16%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	122,948	0.10%

Total Companies Writing in MA	35
Top 20 Companies	\$117,579,422
Direct Written Premium	99.7%
Remaining Companies	\$404,543
Direct Written Premium	0.3%
Total Direct Written Premium	\$117,983,965



## **MORTGAGE & FINANCIAL GUARANTY**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
40266	ARCH MORTGAGE INS CO	WI	29,738,521	23.08%
29858	MORTGAGE GUAR INS CORP	WI	24,400,087	18.93%
33790	RADIAN GUAR INC	PA	17,757,644	13.78%
38458	GENWORTH MORTGAGE INS CORP	NC	17,382,376	13.49%
13634	ESSENT GUAR INC	PA	13,515,858	10.49%
15873	UNITED GUAR RESIDENTIAL INS CO	NC	10,486,357	8.14%
13695	NATIONAL MORTGAGE INS CORP	WI	9,928,918	7.70%
18287	ASSURED GUAR MUNICIPAL CORP	NY	2,448,184	1.90%
28452	REPUBLIC MORTGAGE INS CO	NC	1,373,205	1.07%
18708	AMBAC ASSUR CORP	WI	1,018,640	0.79%
18732	ARCH MORTGAGE GUAR CO	WI	711,086	0.55%
18740	MGIC IND CORP	WI	49,513	0.04%
14380	BUILD AMER MUT ASSUR CO	NY	19,800	0.02%
30180	ASSURED GUAR CORP	MD	18,973	0.01%
12041	MBIA INS CORP	NY	17,733	0.01%
16675	GENWORTH MORTGAGE INS CORP OF NC	NC	119	0.00%

Total Companies Writing in MA	16
Top 20 Companies	\$128,867,014
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$128,867,014

## OCEAN & INLAND MARINE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
19917	LIBERTY INS UNDERWRITERS INC	IL	82,857,273	12.18%
20443	CONTINENTAL CAS CO	IL	56,244,088	8.27%
11630	JEFFERSON INS CO	NY	29,675,967	4.36%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	27,617,431	4.06%
11991	NATIONAL CAS CO	OH	24,229,231	3.56%
12190	AMERICAN PET INS CO	NY	22,735,391	3.34%
21113	UNITED STATES FIRE INS CO	DE	21,621,562	3.18%
22667	ACE AMER INS CO	PA	21,211,263	3.12%
25674	TRAVELERS PROP CAS CO OF AMER	CT	15,360,697	2.26%
27154	ATLANTIC SPECIALTY INS CO	NY	12,350,624	1.82%
22292	HANOVER INS CO	NH	12,007,909	1.77%
10111	AMERICAN BANKERS INS CO OF FL	FL	11,774,846	1.73%
21482	FACTORY MUT INS CO	RI	11,414,105	1.68%
16691	GREAT AMER INS CO	OH	11,369,523	1.67%
31325	ACADIA INS CO	IA	9,069,086	1.33%
37923	GEICO MARINE INS CO	MD	8,851,073	1.30%
20346	PACIFIC IND CO	WI	8,678,393	1.28%
22837	AGCS MARINE INS CO	IL	7,906,341	1.16%
19402	AIG PROP CAS CO	IL	7,628,667	1.12%
16535	ZURICH AMER INS CO	NY	7,504,206	1.10%

Total Companies Writing in MA	282
Top 20 Companies	\$410,107,676
Direct Written Premium	60.3%
Remaining Companies	\$269,950,742
Direct Written Premium	39.7%
Total Direct Written Premium	\$680,058,418

## PRIVATE PASSENGER AUTO

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	1,225,323,020	22.00%
22063	GOVERNMENT EMPLOYEES INS CO	MD	574,006,228	10.31%
39454	SAFETY INS CO	MA	450,304,179	8.08%
17000	ARBELLA MUT INS CO	MA	418,054,513	7.51%
14737	PLYMOUTH ROCK ASSUR CORP	MA	356,664,109	6.40%
36447	LM GEN INS CO	IL	277,985,139	4.99%
23043	LIBERTY MUT INS CO	MA	257,633,303	4.63%
16322	PROGRESSIVE DIRECT INS CO	OH	239,892,849	4.31%
35882	GEICO GEN INS CO	MD	203,703,243	3.66%
26298	METROPOLITAN PROP & CAS INS CO	RI	190,685,651	3.42%
19070	STANDARD FIRE INS CO	CT	183,165,557	3.29%
19976	AMICA MUT INS CO	RI	156,026,842	2.80%
31534	CITIZENS INS CO OF AMER	MI	130,818,168	2.35%
19232	ALLSTATE INS CO	IL	90,170,697	1.62%
15067	QUINCY MUT FIRE INS CO	MA	79,531,819	1.43%
24260	PROGRESSIVE CAS INS CO	OH	76,439,179	1.37%
25968	USAA CAS INS CO	TX	61,864,544	1.11%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	59,376,036	1.07%
26018	VERMONT MUT INS CO	VT	56,023,116	1.01%
25941	UNITED SERV AUTOMOBILE ASSN	TX	47,554,323	0.85%

Total Companies Writing in MA	58
Top 20 Companies	\$5,135,222,515
Direct Written Premium	92.2%
Remaining Companies	\$434,944,454
Direct Written Premium	7.8%
Total Direct Written Premium	\$5,570,166,969

## PROPERTY & CASUALTY TOTAL

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	1,510,396,683	9.93%
39454	SAFETY INS CO	MA	637,982,207	4.19%
22063	GOVERNMENT EMPLOYEES INS CO	MD	579,739,744	3.81%
17000	ARBELLA MUT INS CO	MA	565,139,188	3.72%
23043	LIBERTY MUT INS CO	MA	364,918,229	2.40%
14737	PLYMOUTH ROCK ASSUR CORP	MA	361,416,850	2.38%
36447	LM GEN INS CO	IL	346,880,407	2.28%
19976	AMICA MUT INS CO	RI	276,716,185	1.82%
26298	METROPOLITAN PROP & CAS INS CO	RI	259,416,845	1.71%
20281	FEDERAL INS CO	IN	250,510,509	1.65%
16322	PROGRESSIVE DIRECT INS CO	OH	242,450,051	1.59%
40274	CITATION INS CO	MA	237,138,134	1.56%
31534	CITIZENS INS CO OF AMER	MI	226,435,555	1.49%
19070	STANDARD FIRE INS CO	CT	216,904,567	1.43%
26018	VERMONT MUT INS CO	VT	204,264,685	1.34%
35882	GEICO GEN INS CO	MD	203,703,242	1.34%
41360	ARBELLA PROTECTION INS CO	MA	200,721,342	1.32%
22667	ACE AMER INS CO	PA	174,564,409	1.15%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	172,277,599	1.13%
15067	QUINCY MUT FIRE INS CO	MA	167,197,176	1.10%

Total Companies Writing in MA	569
Top 20 Companies	\$7,198,773,607
Direct Written Premium	47.3%
Remaining Companies	\$8,012,264,743
Direct Written Premium	52.7%
Total Direct Written Premium	\$15,211,038,350

## **SURPLUS LINES**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
36940	INDIAN HARBOR INS CO	DE	59,184,558	6.27%
19437	LEXINGTON INS CO	DE	56,777,196	6.02%
20079	NATIONAL FIRE & MARINE INS CO	NE	54,890,210	5.82%
35378	EVANSTON INS CO	IL	47,859,403	5.07%
10725	LIBERTY SURPLUS INS CORP	NH	42,866,497	4.54%
25445	IRONSHORE SPECIALTY INS CO	AZ	41,844,273	4.43%
17370	NAUTILUS INS CO	AZ	38,123,327	4.04%
12203	JAMES RIVER INS CO	OH	34,497,594	3.66%
26883	AIG SPECIALTY INS CO	IL	28,408,301	3.01%
27960	ILLINOIS UNION INS CO	IL	26,415,374	2.80%
41297	SCOTTSDALE INS CO	OH	26,085,751	2.76%
13196	WESTERN WORLD INS CO	NH	20,191,584	2.14%
41718	ENDURANCE AMER SPECIALTY INS CO	DE	19,335,895	2.05%
25038	NORTH AMER CAPACITY INS CO	NH	18,179,221	1.93%
26620	AXIS SURPLUS INS CO	IL	17,017,907	1.80%
24856	ADMIRAL INS CO	DE	15,703,598	1.66%
10172	WESTCHESTER SURPLUS LINES INS CO	GA	15,414,898	1.63%
42374	HOUSTON CAS CO	TX	15,248,655	1.62%
31127	COLUMBIA CAS CO	IL	15,120,953	1.60%
37532	GREAT AMER E&S INS CO	DE	14,791,298	1.57%

Total Companies Writing in MA	109
Top 20 Companies	\$607,956,493
Direct Written Premium	64.4%
Remaining Companies	\$335,748,494
Direct Written Premium	35.6%
Total Direct Written Premium	\$943,704,987

## TITLE INSURANCE

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
50814	First Amer Title Ins Co	NE	94,331,711	29.35%
51268	Connecticut Attorneys Title Ins Co	VT	54,433,286	16.94%
50520	Old Republic Natl Title Ins Co	FL	47,284,594	14.71%
50229	Chicago Title Ins Co	FL	40,749,828	12.68%
51586	Fidelity Natl Title Ins Co	FL	25,297,173	7.87%
50083	Commonwealth Land Title Ins Co	FL	24,637,287	7.67%
50121	Stewart Title Guar Co	TX	18,460,053	5.74%
50050	Westcor Land Title Ins Co	SC	5,873,531	1.83%
51152	WFG Natl Title Ins Co	SC	4,765,333	1.48%
50016	Title Resources Guar Co	TX	3,269,822	1.02%
50130	North Amer Title Ins Co	CA	1,331,818	0.41%
51411	American Guar Title Ins Co	OK	722,145	0.22%
51020	National Title Ins Of NY Inc	NY	227,495	0.07%
51632	Radian Title Ins Inc	OH	33,174	0.01%
51578	AmTrust Title Ins Co	NY	6,117	0.00%

Total Companies Writing in MA	15
Top 20 Companies	\$321,423,367
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$321,423,367

## WORKERS' COMPENSATION

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
33758	ASSOCIATED INDUSTRIES OF MA MUT INS	MA	95,375,511	7.46%
23841	NEW HAMPSHIRE INS CO	IL	72,941,293	5.71%
22667	ACE AMER INS CO	PA	58,247,324	4.56%
25682	TRAVELERS IND CO OF CT	CT	49,889,231	3.90%
11104	ASSOCIATED EMPLOYERS INS CO	MA	38,267,233	2.99%
25666	TRAVELERS IND CO OF AMER	CT	38,175,420	2.99%
44326	ATLANTIC CHARTER INS CO	MA	33,909,088	2.65%
30104	HARTFORD UNDERWRITERS INS CO	CT	33,544,242	2.63%
42390	AMGUARD INS CO	PA	31,756,346	2.49%
40142	AMERICAN ZURICH INS CO	IL	31,095,561	2.43%
25658	TRAVELERS IND CO	CT	29,274,227	2.29%
33600	LM INS CORP	IL	28,697,532	2.25%
23035	LIBERTY MUT FIRE INS CO	WI	27,891,821	2.18%
31470	NORGUARD INS CO	PA	27,388,611	2.14%
16535	ZURICH AMER INS CO	NY	25,333,303	1.98%
29459	TWIN CITY FIRE INS CO	IN	24,600,153	1.93%
25674	TRAVELERS PROP CAS CO OF AMER	CT	23,748,931	1.86%
11984	INDEPENDENCE CAS INS CO	MA	22,874,807	1.79%
42404	LIBERTY INS CORP	IL	20,914,210	1.64%
19682	HARTFORD FIRE INS CO	CT	19,150,422	1.50%

Total Companies Writing in MA	Group Code
Top 20 Companies	\$733,075,266
Direct Written Premium	57.4%
Remaining Companies	\$544,631,953
Direct Written Premium	42.6%