

Massachusetts Division of Insurance

2020 Annual Report



Table of Contents

Division of Insurance	7
Mission	7
Primary Activities.....	7
Organizational Chart.....	10
Human Resources	11
Budget, Revenue & Assessments.....	11
Budget	11
Revenue & Assessments.....	11
The Massachusetts Insurance Marketplace	12
Massachusetts Domestics	12
Company Market Share	12
Financial Surveillance & Company Licensing.....	15
Mission	15
2020 Goals.....	15
Primary Activities.....	15
Financial Surveillance	16
Company Licensing	17
New Licenses, Authority or Eligibility.....	17
Notable Transactions.....	18
Financial Examinations.....	22
Mission	22
2020 Goals.....	22
Primary Activities.....	22
Financial Examinations	22
Other Insurance Entities	27
Special Brokers Tax Collection	27
Life Company Certification and Valuation Fees Collection.....	27
Special Activities	27
Training & Professional Accomplishments.....	27
Market Conduct.....	28
Mission	28
2020 Goals.....	28
Primary Activities.....	29

Examinations and Reviews	29
Market Analysis	29
Consumer Restitution.....	30
Monetary Fines.....	30
Producer Licensing.....	30
License Types	30
Mission	30
Primary Activities.....	31
Enforcement of Continuing Education (CE) Requirements	31
State Rating Bureau	31
Mission	31
2020 Goals.....	32
Primary Activities.....	32
Private Passenger Automobile Insurance	32
Transition to Competitive Rate Regulation	33
Residual Market Reform.....	34
Homeowners Insurance	34
Commissioner's Report on Home Insurance	34
Workers' Compensation Insurance.....	36
Rate Review	36
Monitoring the Workers' Compensation Residual Market	38
Responding to COVID-19.....	38
Medical Malpractice Insurance	39
Life Insurance	39
Policy Form Review	39
Mission	39
Paid Family and Medical Leave Policies.....	40
Bureau of Managed Care.....	41
Mission	41
Addressing COVID-19	41
Managed Care	42
Managed Care Accreditation Reviews	43
Mental Health Parity	43
Health Care Access Bureau.....	44
Risk Bearing Provider Organizations (RBPOs)	45

Analysis of Federal Health Market Rules.....	45
Small Group Rate Review and Medical Loss Ratio Rebates.....	45
Merged Market Advisory Council (MMAC).....	45
Administrative Simplification.....	46
Rate Review for Health-related Products.....	46
COVID-19 related activities:.....	46
Office of the General Counsel.....	47
Mission.....	47
Primary Activities.....	47
Hearings and Appeals.....	48
2020 Hearings and Appeals Highlights.....	48
Receiverships.....	49
Distributions to Creditors.....	50
Other Activities.....	50
Public Record Requests.....	50
1033 Committee Reviews.....	50
Special Investigations.....	50
Mission.....	50
2020 Accomplishments.....	51
Board of Appeal.....	52
Primary Activities.....	52
Hearings on At-fault Accident Determinations.....	52
Hearing Locations.....	53
RMV Appeal Hearings.....	53
Automobile Insurance Cancellation.....	55
Automobile Damage Appraiser Licensing Board.....	55
Mission.....	56
Consumer Services.....	56
Mission.....	56
2020 Goals.....	57
2020 Accomplishments.....	57
Consumer Hotline.....	57
Complaint Investigations: Protecting Policyholders.....	57
Online Consumer Publications and Information.....	58
COVID-19 Response.....	59

Administration.....	60
Mission.....	60
2020 Goals.....	60
Appendix A: Acts, Regulations and Bulletins.....	2
2020 Acts.....	2
2020 Regulations.....	5
2020 Bulletins.....	6
Appendix B: Select Financial Information from Massachusetts Domestic Insurance Companies.....	12
Property & Casualty Insurance Companies.....	12
Life Insurance Companies.....	13
Health Insurance Companies.....	14
Fraternal Organizations.....	14
Workers' Compensation Self-Insured Groups.....	14
Appendix C: Direct Premium Written by Line of Insurance.....	15
Accident & Health Insurance.....	15
Aircraft (All Perils).....	15
Annuities.....	16
Boiler & Machinery.....	16
Burglary & Theft.....	17
Commercial Auto.....	17
Commercial Multi-Peril.....	18
Credit.....	18
Deposit Funds.....	19
Fidelity & Surety.....	19
Fire.....	20
Fraternals.....	20
Health.....	21
Homeowner's Multi-Peril.....	21
Liability Other Than Auto.....	22
Life.....	22
Life All Lines.....	23
Life / Other Funds.....	23
Medical Malpractice.....	24
Mortgage & Financial Guaranty.....	24

Ocean & Inland Marine	25
Private Passenger Auto	25
Property & Casualty Total	26
Surplus Lines	26
Title Insurance	27
Workers' Compensation	27
Appendix C: 2019 Direct Written Premium by Line of Insurance	29
Accident & Health Insurance	29
Aircraft (All Perils)	29
Annuities	30
Boiler & Machinery	30
Burglary & Theft	31
Commercial Auto	31
Commercial Multi-Peril	32
Credit	32
Deposit Funds	33
Fidelity & Surety	33
Fire	34
Fraternal	34
Health	35
Homeowner's Multi-Peril	35
Liability Other Than Auto	36
Life	36
Life All Lines	37
Life / Other Funds	37
Medical Malpractice	38
Mortgage & Financial Guaranty	38
Ocean & Inland Marine	39
Private Passenger Auto	39
Property & Casualty Total	40
Surplus Lines	40
Title Insurance	41
Workers' Compensation	41

Division of Insurance

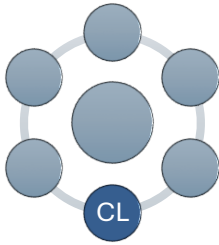
Mission

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 and thereby 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 about various types of insurance coverage through its website and assorted publications. The Division protects consumers by providing them with accurate and unbiased information with which they may make informed decisions and intervenes on behalf of consumers who believe they have been victimized by unfair business practices.

Primary Activities

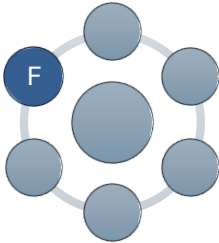
The Division protects consumers and promotes a fiscally sound insurance marketplace through the performance of six primary activities. Taken together, these activities represent the core of effective insurance regulation.





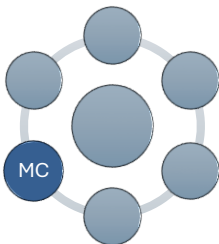
License Insurance Companies (CL)

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



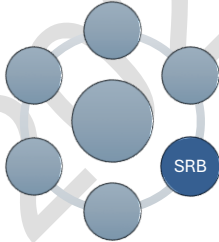
Examine the Financial Condition of Insurance Companies (F)

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.



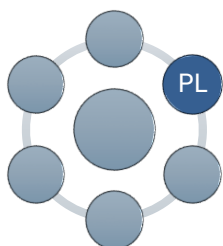
Examine the Market Conduct of Insurance Companies (MC)

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.



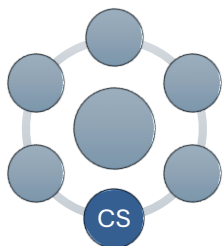
Regulate Insurance Policy Forms, Rates and Programs (SRB)

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)

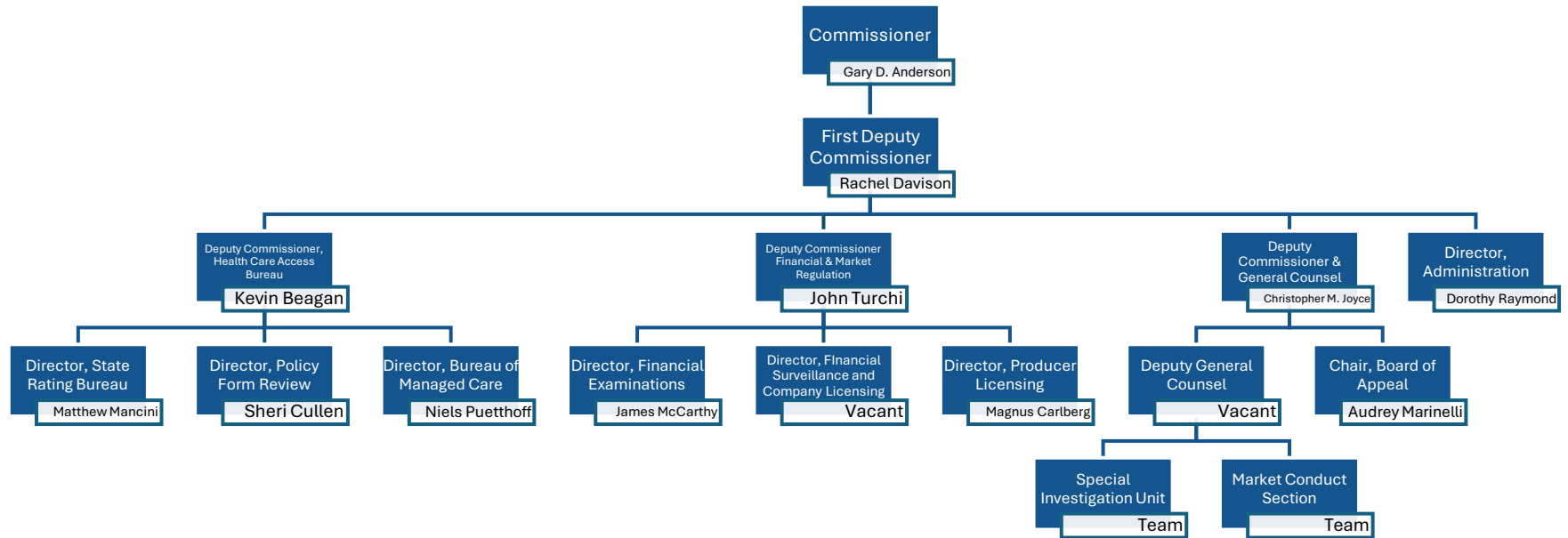
The process of licensing insurance producers and other key participants in the insurance industry allows the Division to promote a marketplace in which individuals and firms engaging in the business of insurance are qualified and are conducting business in compliance with the Commonwealth's laws and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

Organizational Chart



2020 ARI

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, 2022, the Division Employed 116 full-time employees.

Division of Insurance Staffing Levels

1979 – 193 staff
2020 – 116 staff

Budget, Revenue & Assessments

Budget

The Division receives an annual budget appropriation from the Massachusetts Legislature to main account 7006-0020, the value of which is then assessed back to the entities the Division regulates and Health Care Access Bureau account 7006-0029 – the value of which is then assessed back to carriers with insured health business in Massachusetts. 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.

Revenue & Assessments

The Division collects revenue from individual consumers, licensees and companies as part of its statutory responsibilities. The Division also bills 12 different annual 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 2020, the Division billed 12 assessments totaling over \$79 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, these revenue and assessment collections are typically nine to ten times greater than the Division's annual budget appropriation for the Division. In Fiscal Year 2020, (July 1, 2019) through June 30, 2020, the Division collected revenue in excess of \$186 million.

Division of Insurance Budget for FY2020	\$17,576,448
Total Collections for the General Fund for FY2020	\$186,480,224

The Massachusetts Insurance Marketplace

Massachusetts Domestics

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 premiums 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 2020, 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 insurers
- 21 workers' compensation self-insured groups
- 6 residual market pools; and
- 144 fraternal benefit and mutual aid societies.

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%

Financial Surveillance & Company Licensing

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.

2020 Goals

- (1) 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.
- (2) 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.
- (3) Process license and 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.
- (4) 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.

Primary Activities

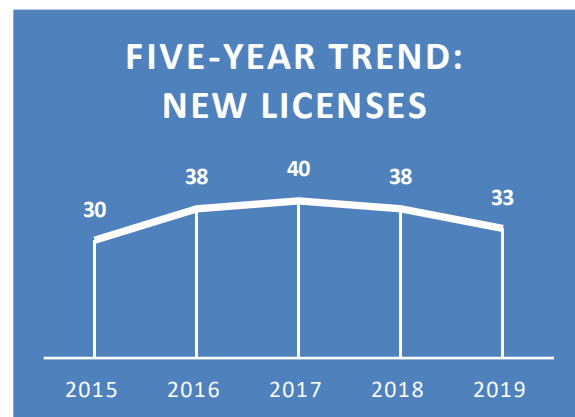
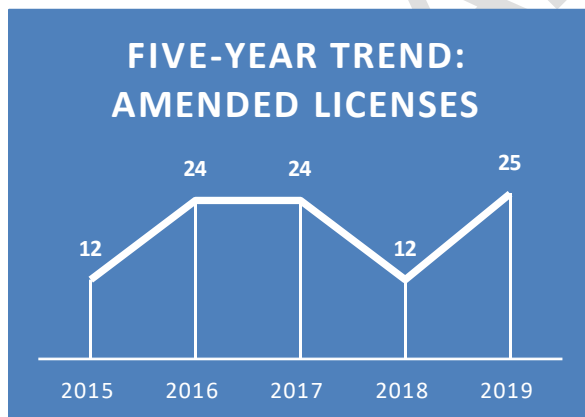
The Financial Surveillance and Company Licensing staff analyzes company annual statement findings, processes license certifications and manages the collection of related revenue, which totaled approximately \$658,000 in Fiscal Year 2019.

Financial Surveillance

The Financial Surveillance Section monitors the solvency of domestic and foreign (domiciled in another state) insurance companies. There are currently 1808 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 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

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, 12 companies became eligible alien unauthorized insurers.

New Licenses, Authority or Eligibility

Surplus Lines

ATEGRITY SPECIALTY COMPANY
HOUSING SPECIALTY INSURANCE COMPANY

Eligible Alien Unauthorized Insurers

CIGNA GLOBAL INSURANCE COMPANY LIMITED
CNA INSURANCE COMPANY (EUROPE) S.A.
COVEX INSURANCE UK LIMITED
DAC EVEREST INTERNATIONAL ASSURANCE, LTD.
EVEREST INSURANCE (IRELAND)
LLOYD'S SYNDICATE #1947
MAPFRE ESPAÑA COMPANA DE SEGUROS Y RESEGUROS, S.A.
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

SECURRANTY, 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.
PENNSYLVANIE MANUFACTURERS INDEMNITY COMPANY
SFM MUTUAL INSURANCE COMPANY
VAULT RECIPROCAL EXCHANGE
MEDICAL MUTUAL INSURANCE COMPANY OF NC
CM REGENT INSURANCE COMPANY
UTICAL NATIONAL INSURANCE COMPANY OF OHIO

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 paid in capital from its partner company in 2019.

Bunker Hill Ins. Casualty Co.

- The Company received \$2.4 million of paid capital from its parent company, BunkerHill Insurance Company.

Bunker Hill Ins. Co.

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

Bunker Hill Preferred Ins. Co.

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

Bunker Hill Property Ins. Co.

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

Bunker Hill Security Ins. Co.

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

CeltiCare Health Plans of Massachusetts, Inc.

- In 2019, the Company paid an extraordinary \$8 million 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 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, 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 Oppenheimer 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 \$64 million 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 \$10.0 million extraordinary dividend, which was approved by the Division in February 2020.

Financial Examinations

Mission

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

2020 Goals

Conduct financial examinations of domestic insurance companies 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.

Primary Activities

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
- Disaster Recovery Plan

In addition to this list, the review also includes other pertinent matters, so to provide a reasonable assurance that the company complies 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.

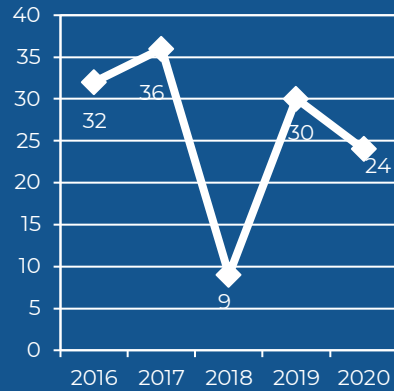
In 2020, the Financial Examination Section completed routine statutory examinations of twenty-four insuring organizations. These companies produced \$12.7 billion in premium nationwide - \$10.5 billion in Massachusetts.

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 twenty-four full-scope financial examinations with an "as of" date of December 31, 2018. All these examinations were completed by June 30, 2020, within the "18 Month Rule" timeframe noted above.

Eighteen examinations were in progress at year's end, representing approximately \$26.8 billion in premium nationwide - \$2.9 billion in Massachusetts.

Five Year Trends: Completed Examinations



2020 Completed Examinations

3 Life, Accident & Health Insurers

16 Property & Casualty Ins.

3 Health Insurers

0 Residual Market

2 Self-Insured Groups

0 Fraternal Insurers

Examination Reports In Progress 12/31/2020

	US Direct Premium	MA Direct Premium	Surplus
Property & Casualty Insurers			
Bay State Insurance Company	90,047,000	61,273,000	404,169,000
Cambridge Mutual Fire Insurance Company	128,936,000	14,570,000	638,698,000
Dorchester Mutual Insurance Company	40,589,000	40,470,000	51,395,000
Fitchburg Mutual Insurance Company	35,656,000	1,000	73,331,000
Merrimack Mutual Insurance Company	366,566,000	152,889,000	1,158,604,000
New England Mutual Insurance Company	11,651,000	9,128,000	44,125,000
Norfolk & Dedham Mutual Fire Insurance Company	180,644,000	172,278,000	236,794,000
Quincy Mutual Fire Insurance Company	220,647,000	167,197,000	1,234,584,000
Health Insurers			
Dental Service of Massachusetts, Inc.	239,264,000	239,264,000	59,871,000
Dentegra Insurance Company of New England	3,345,000	3,377,000	6,138,000
DSM Massachusetts Insurance Company	19,848,000	19,848,000	9,461,000

Health New England, Inc.	730,312,000	360,253,000	86,983,000
HNE Insurance Company	1,781,000	1,781,000	5,076,378
Life, Accident & Health Insurers			
Commonwealth Annuity & Life Insurance Company	777,064,000	3,635,000	2,845,836,000
First Allmerica Financial Life Insurance Company	51,281,000	617,529	245,635,000
John Hancock Life & Health Insurance Company	161,983,000	1,997,000	1,108,839,000
Massachusetts Mutual Life Insurance Company	23,763,742,000	1,612,099,000	18,892,910,000
Fraternal Insurers			
Catholic Association of Foresters	112,000	95,000	3,180,000
TOTALS	26,823,468,000	2,860,772,529	27,105,629,378

Examination Reports Issued 12/31/2020			
	US Direct Premium	MA Direct Premium	Surplus
Property & Casualty Insurers			
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
Health Insurers			
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
Life, Accident & Health Insurers			
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
Self-Insurance Groups			
Massachusetts Interlocal Insurance	85,862,000	85,862,000	125,853,000

Association			
Massachusetts Bay Self Insurance Group	3,185,000	3,185,000	1,418,000
TOTALS	\$12,745,691,000	\$10,500,977,000	\$23,495,688,000

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.

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 2020 for business written in calendar year 2019 totaled \$50.0 million on written premium of \$1.25 billion.

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 2020 amounted to \$511,885.

Special Activities

Training & Professional Accomplishments

Several Financial Examination Section staff attended virtual training sessions and webinars presented by the Society of Financial Examiners and the National Association of Insurance Commissioners (NAIC). The Society of Financial Examiners (SOFE) is a professional society made up of state insurance examiners throughout the United States and its territories. The NAIC is the U.S. Standard setting and regulatory support organization created and governed by the chief insurance regulators from the 50 states, District of Columbia, and five U.S. territories. Through these sessions 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, ethics, and the latest legislation, auditing, and regulatory issues.

Market Conduct

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.

2020 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.

Primary Activities

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 2020, 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 2020.

- The Commerce Insurance Company and Citation Insurance Company; and
- Liberty Mutual Insurance Group.

Market Analysis

In 2020, the Market Conduct Section completed market analysis reviews on 75 companies for specific lines of business (homeowners, private passenger automobile, pet insurance, individual life, and individual annuity). Examiners conducted limited scope analysis of examinations of 32 companies; 44 of the 75 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.

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 to provide restitution to disabled Massachusetts claimants. As of December 31, 2020 over \$16.7 million has been paid or reserved for payment to future claimants.

Monetary Fines

The Market Conduct Section collected \$77,300 in fines in 2020 as a result of a regulatory settlement agreement entering into with a domestic insurance company.

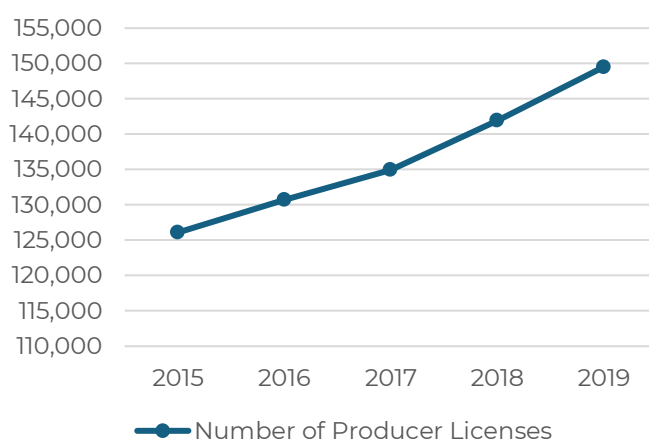
Producer Licensing

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

Five-Year Licensing Trend: Producer Licenses



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 licenses 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.

Primary Activities

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.

State Rating Bureau

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.

2020 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 spreadsheets to capture data required by the statute. Prepare data for report due to legislature April of 2020.
- Support consumers and industry through Covid-19 Pandemic. Develop Filing Guidance Notices to guide industry about how to respond to pressures of the Covid-19 Pandemic, including promoting flexibility in maintaining coverage for those employers and individuals displaced by the economic impacts of the COVID-19 responses, expediting the review of Private Passenger Auto filings and issuing credits/rebates in response to COVID-19 changes to driving patterns.

Primary Activities

As the technical advisor to the Commissioner, the work of the SRB covers many different areas of the insurance marketplace. In 2020, the SRB performed reviews and analyses in the following areas of insurance:

- Private passenger automobile
- Homeowners
- Workers' compensation
- Medical malpractice
- Life
- Accident and sickness

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:

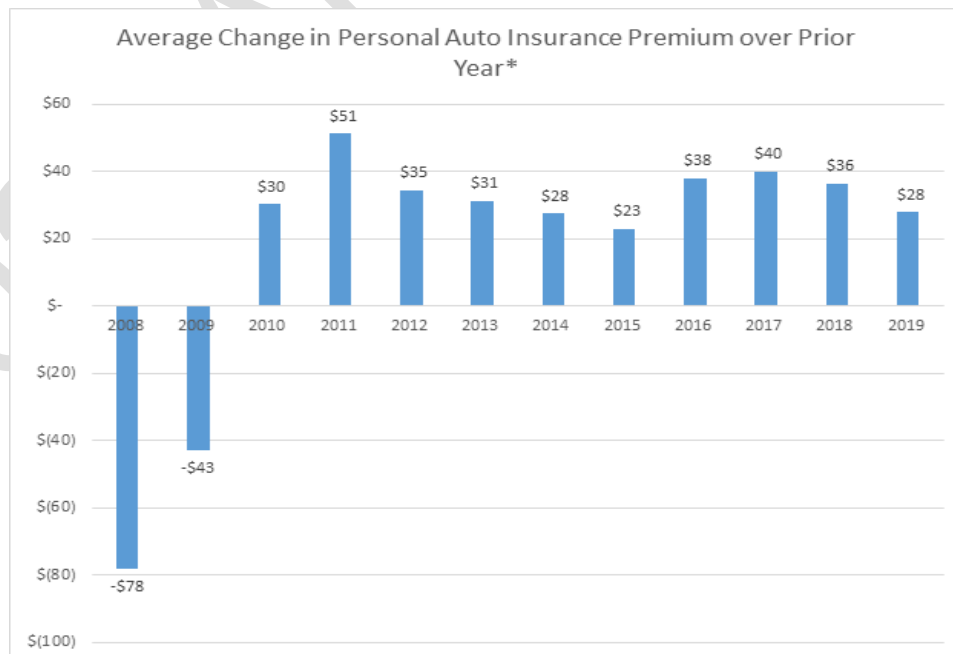
- Monitoring the activities of the residual market administered through Commonwealth Automobile Reinsurers ("CAR");
- Reviewing all company and CAR form, rule and rate filings; and
- Reviewing statistical plan filings.

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

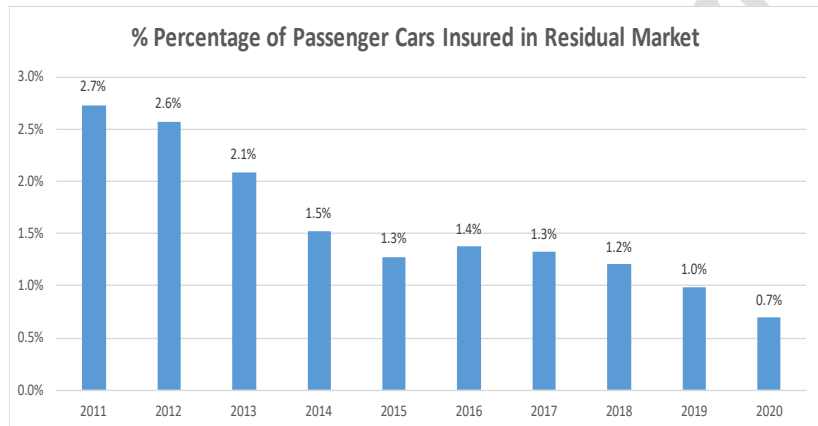
AIG PRIVATE CLIENT
ALLSTATE
AMERIPRISE (IDS)
BANKERS STANDARD
BERKLEY
CINCINNATI
ESURANCE
GEICO
GREEN MOUNTAIN
HARLEYSVILLE
HARTFORD (TRUMBULL)
MIDVALE (AMERICAN FAMILY)
PERMANENT GENERAL
PRAETORIAN
PREFERRED MUTUAL
PROGRESSIVE
SAFECO
VERMONT MUTUAL



*The most recent two years of data are estimates as the final historic NAIC data is not yet available. The estimated 2020 average personal automobile premium per vehicle is \$220 more than it was in 2007, prior to the introduction of competitive rate regulation.

Residual Market Reform

Massachusetts completed its transition to an assigned risk plan (the Massachusetts Automobile Insurance Plan or “MAIP”) for the Private Passenger Automobile residual market in 2009. Since 2009, the residual market has declined from 2.7% of the total market at year-end 2009 to 0.3% by year-end 2020.



Since 2009, CAR has implemented many significant procedural changes to provide incentives for insurance companies to voluntarily insure policies that otherwise would likely be insured through the MAIP. By developing a more transparent and objective process, actual changes in residual market share continued to drive the indicated and actual credits in the market.

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:

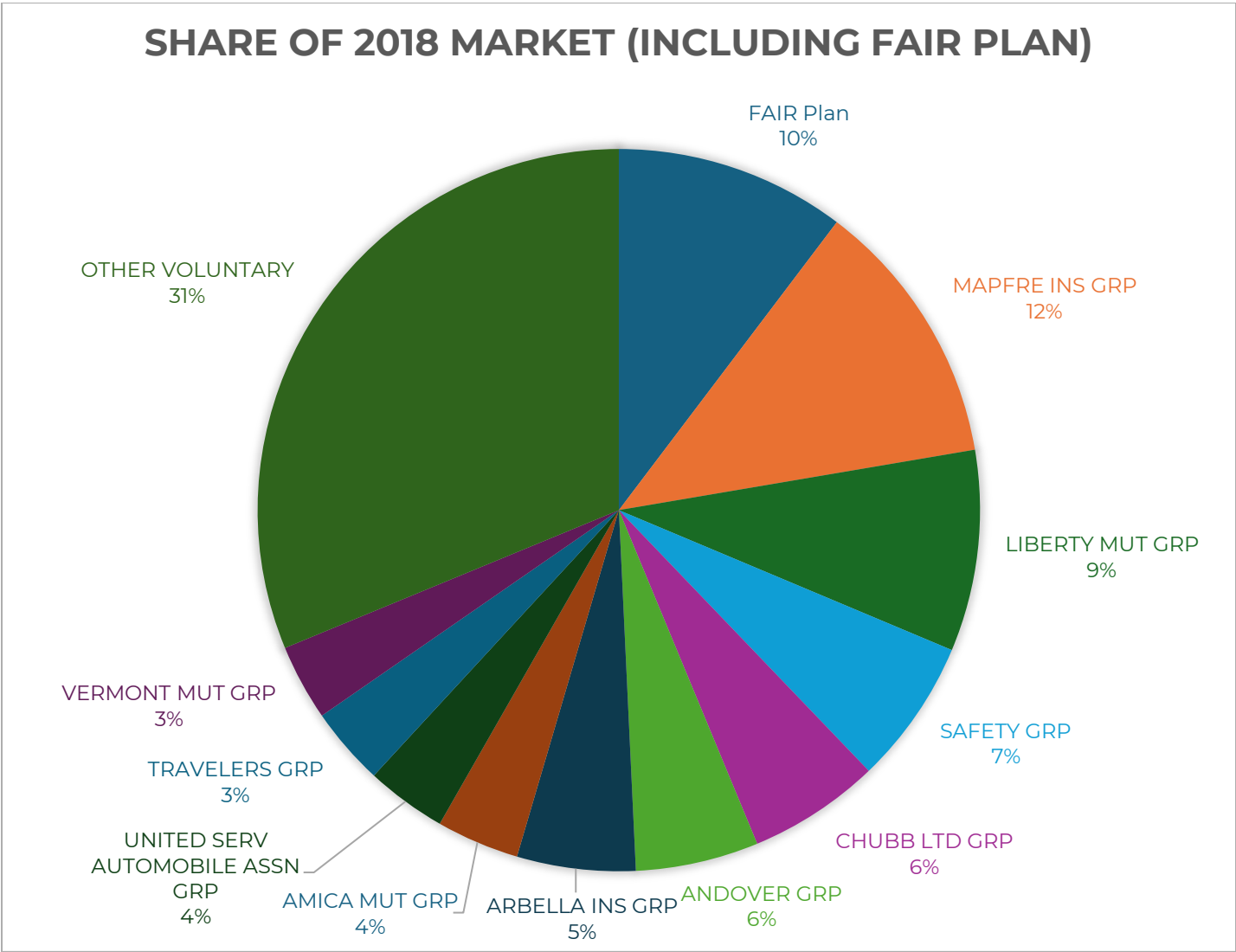
- Monitoring the market for coverage;
- Reviewing the activities of the residual market administered through the Massachusetts Property Insurance and Underwriting Association (the “FAIR Plan”); and
- Reviewing all company and FAIR Plan form, rule and rate submissions.

Commissioner's Report on Home Insurance

In 2020, 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 2017 and 2019 increased by approximately 61,542 policies.

Between 2017 and 2019, the average premium for homeowner policies increased by \$126 from \$1,520 to \$1,646, the average premium for condominium policies increased \$10 from \$473 to \$483; and the average premium for tenant policies decreased by \$20 from \$218 to \$198.



The following chart identifies FAIR Plan rate changes since 1996. There have been no change in 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

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.

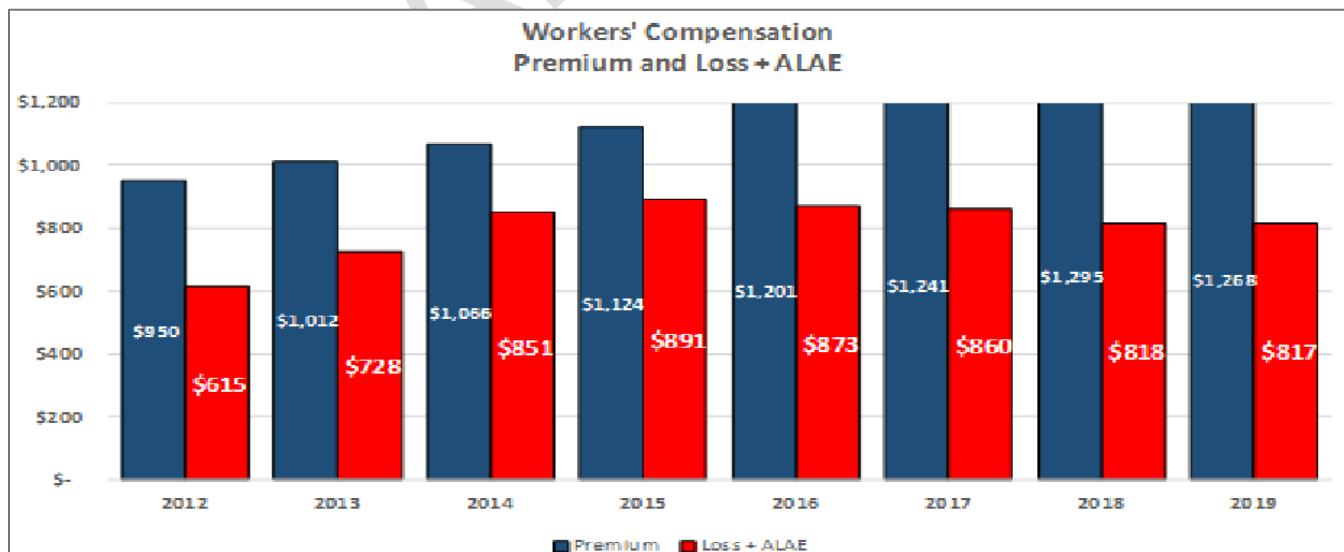
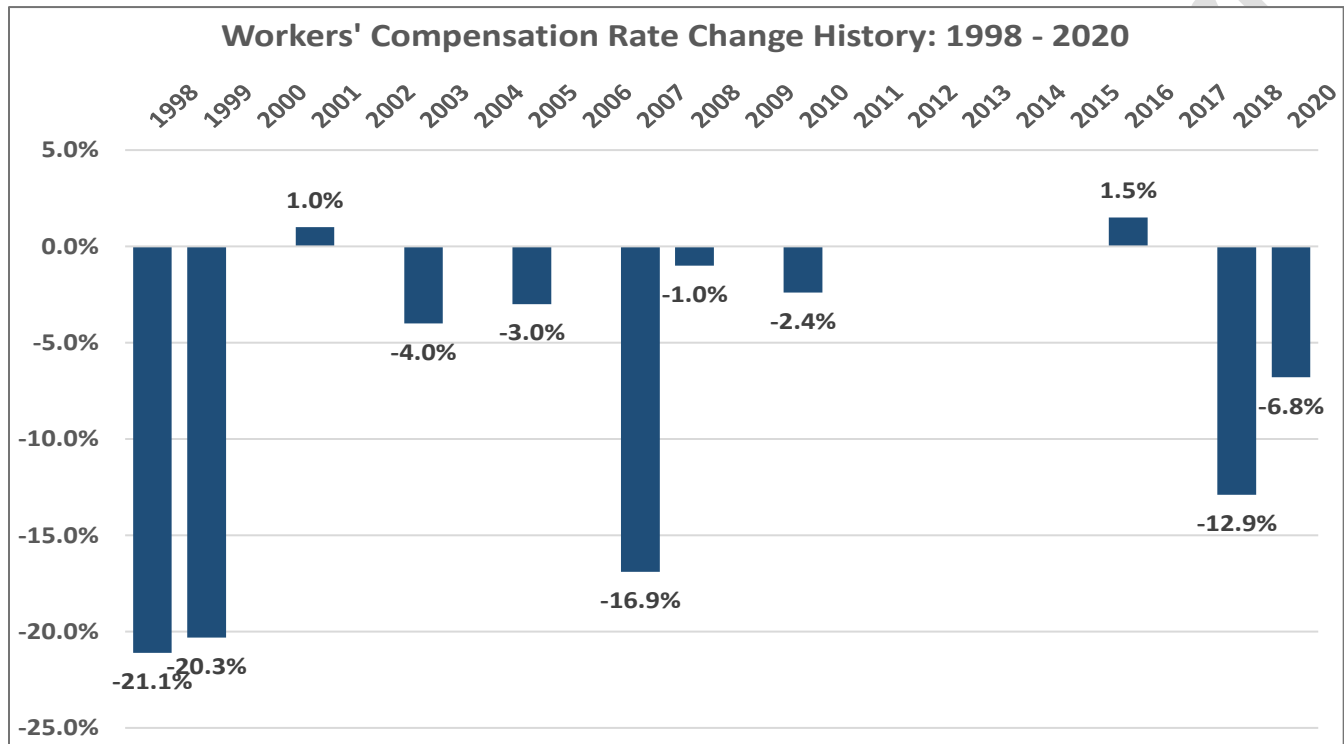
Rate Review

The WCRIBMA filed for a 3.8% decrease in average rates On December 20th of 2019 with an effective date of July 1, 2020. Hearings were initiated in the spring of 2020 and were resolved by a stipulation entered into by all parties on March 27, 2020. As a result of the stipulation, the overall rates were recued by -6.8% representing an annual savings of approximately \$84 million for Massachusetts policyholders.

Carriers are permitted to file to apply rates that are lower than the approved rates. A total of 49 carrier groups and ten Self-Insurance Groups were approved for downward deviations in 2020, including 18 individual companies with 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.

In December 2019 WCRIBMA had filed its final version of modifications to the workers'

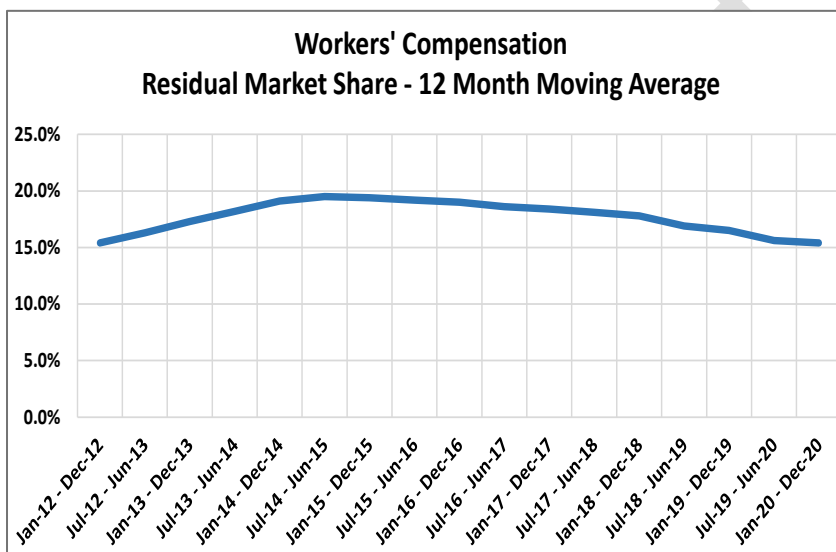
compensation manual and new endorsements in order to accommodate regulation, 454 CMR 30.00. This regulation was promulgated by the Massachusetts Department of labor Standards on April 19, 2019, to facilitate the regulation of Professional Employer Organizations in the Commonwealth. Among other initiatives the regulation provides for an employee leasing entity to allocate responsibility for workers' compensation insurance to the client company, whereas under the previously existing regulation the employee leasing entity alone would have responsibility for workers' compensation insurance.



It is worth noting that the calendar year information displayed below suggests that, in spite of the many rate reductions and downward company deviations over the last two decades, workers' compensation insurance continues to be a profitable line in Massachusetts.

Monitoring the Workers' Compensation Residual Market

Workers' compensation companies are permitted to decline risks, which can then obtain coverage through the Massachusetts Workers' Compensation Assigned Risk Pool. The Division monitors whether companies are increasing the number of risks covered through the pool.



Responding to COVID-19

Governor Baker declared a state of emergency March 10th, 2020, as a result of the outbreak of coronavirus. The SRB in conjunction with DOI senior leadership collaborated with the WCRIBMA to respond to this ongoing and unprecedented challenge to the Commonwealth.

On July 17th, 2020, the Division approved a WCRIBMA filing to allow carriers to report paid furlough payrolls using statistical code 0012. Payroll reported under code 0012 is effectively charged a zero-premium rate. Beginning in June 2020, the DOI directed the WCRIBMA to collect COVID-19 data retroactive to the beginning of the pandemic in order to quantify the impact of the pandemic on Massachusetts workers' compensation payrolls and premium volumes in comparison to 2019 levels. The Division also requested claim counts and loss amounts for fatal and non-fatal COVID-19 claims.

The WCRIBMA reported that as of December 31, 2020, voluntary market policy counts had increased by an estimated 2% over 2019 while voluntary market premium had decreased by an estimated 2%. Residual market estimated policy counts fell by 9% and residual market premium slipped by an estimated 10%, compared to 2019 figures.

With regard to the COVID-19 claims data, through year-end 2020 there had been eleven (11) non-zero fatal claims reported by the 16 Massachusetts workers compensation writers who have a market share of 1% or more (together representing 85% of the market). These fatal claims had generated \$585,250 of medical incurred losses and \$1,678,059 of indemnity

incurred losses. At year-end there were 2,449 reported non-fatal COVID-19 claims with non-zero paid losses or non-zero case reserves. These claims had \$6,826,823 of incurred medical losses and \$6,889,937 of indemnity losses incurred.

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 2020, SRB staff completed a report titled “Medical Malpractice Insurance in the Massachusetts Market 2019,” 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.

Life Insurance

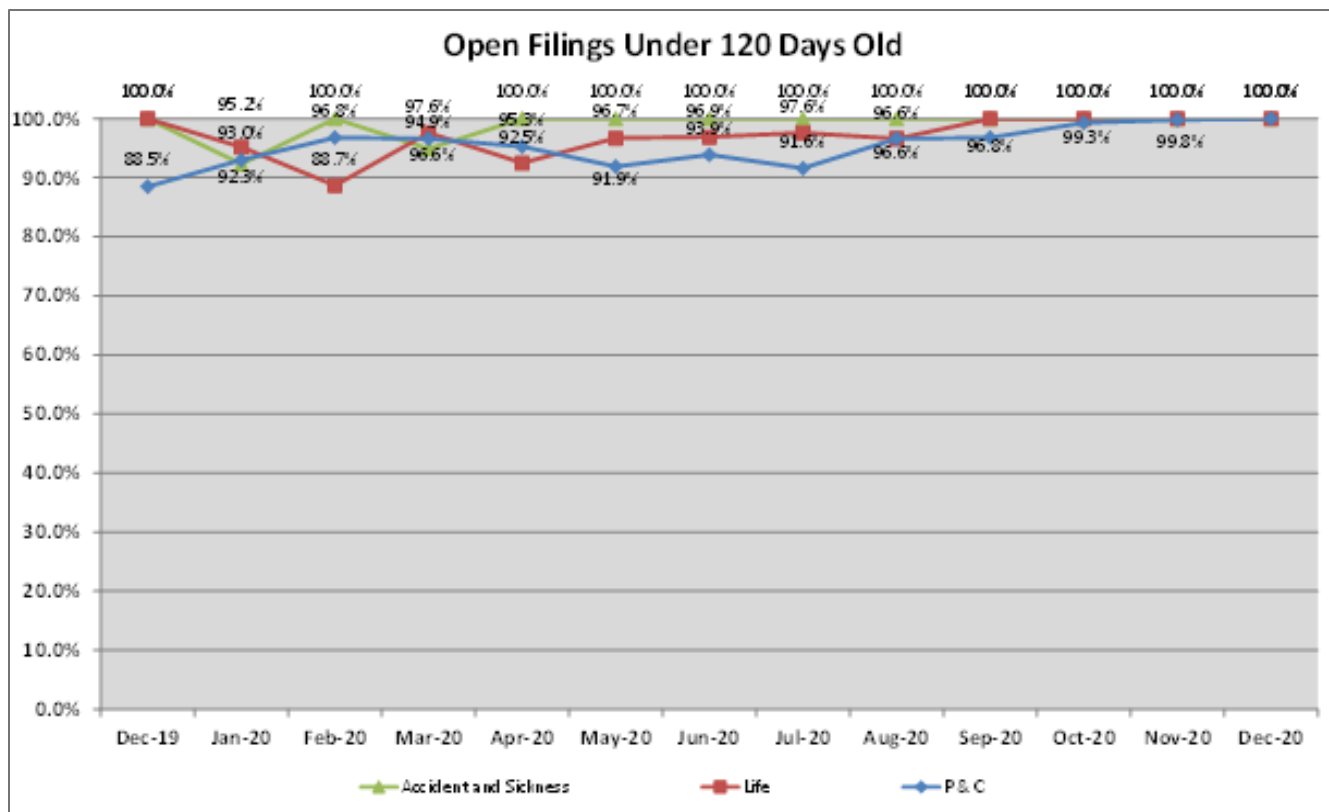
The Division promulgated no new life insurance regulations and issued no new life insurance bulletins during calendar year 2020.

Policy Form Review

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.



Paid Family and Medical Leave Policies

Beginning on January 1, 2021, M.G.L. c. 175H requires most Massachusetts employees to be able to apply for certain paid family and medical leave (PFML) benefits through a qualified employer plan if certain qualifying events occur, including the following:

- medical leave for an individual's own serious health condition
- family leave to bond with a child during the first 12 months after the child's birth, adoption or foster care placement
- family leave to care for a covered family member with a serious health condition
- family leave for a qualifying exigency arising out of the fact a covered individual's family member is a current member of the Armed Forces
- family leave to care for a family member who is or was a member of the Armed Forces and who requires medical care as a result of an illness or injury related to the family member's active service.

The Policy Form Review Section coordinated numerous meetings with the Department of Family and Medical Leave (DFML) and representatives of the insurance industry to establish guidelines for the development of new PFML products for employers that would cover the new M.G.L. c. 175H mandate. These sessions were designed to develop policy templates that carriers would use to develop their products that would later be reviewed by Policy Form Review staff for compliance with DFML rules and standards. Once the Policy Form Review section found that the products met the appropriate standards,

employers could be assured that they were providing a qualified program that would meet DFML standards by the required date of January 1, 2021.

Continuing with the process of developing standards the Policy Form Review section coordinated the development of Filing Guidance Notice 2020-A (“Guidelines for Carriers Offering Paid Family and Medical Leave Coverage in Massachusetts to Submit Policies for Division of Insurance Review for Consistency with Department of Family and Medical Leave Standards”) and Filing Guidance Notice 202-E (Updated Guidelines For Carriers Offering Paid Family and Medical Leave Coverage in Massachusetts to Submit Policies for Division of Insurance Review for Consistency with the Department of Family and Medical Leave Standards).

In total products from 19 carriers’ products were acknowledged as being consistent with the DFML standards and were offered to employers to satisfy the requirements of the PFML for the January 1, 2021 deadline.

Bureau of Managed Care

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
- Evidences 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.

Addressing COVID-19

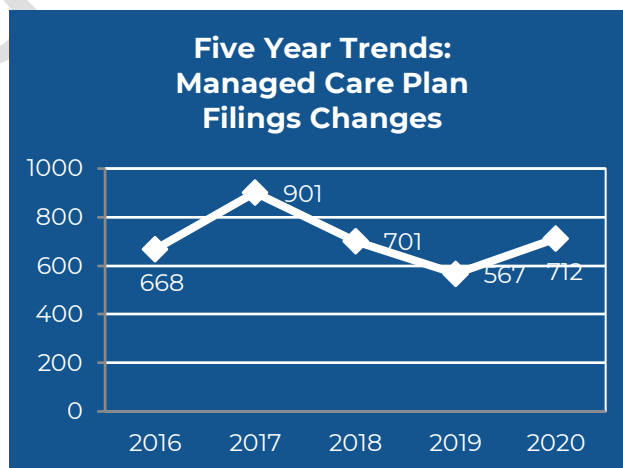
On March 15, 2020, Governor Baker issued an “Order Expanding Access to Telehealth Services and To Protect Health Care Providers” (“Emergency Order”) that is effective as of March 16, 2020. The public health and societal impact resulting from the spread of the Coronavirus dramatically impacted the Commonwealth. The Division issued a number of bulletins to provide guidance to insurance carriers because it was essential that government and business leaders take all appropriate steps to safeguard the general public and well-being of the Commonwealth’s citizens.

Especially since health insurance coverage plays a critical role in the public's actual and perceived affordability of and access to health care services and Coronavirus imposed unique risks to our insurance market that Massachusetts has not faced for at least a generation, the Division issued many bulletins to advise carriers regarding the need for flexibility in managed care practices to properly test, treat and provide vaccines against the Coronavirus, and to relax administrative and utilization review procedures to enable out-of-state providers to be available to treat coronavirus, to transfer patients from inpatient facilities to step-down facilities and home, to ease access to early intervention services and provide access to telehealth services to reduce the spread of the Coronavirus.

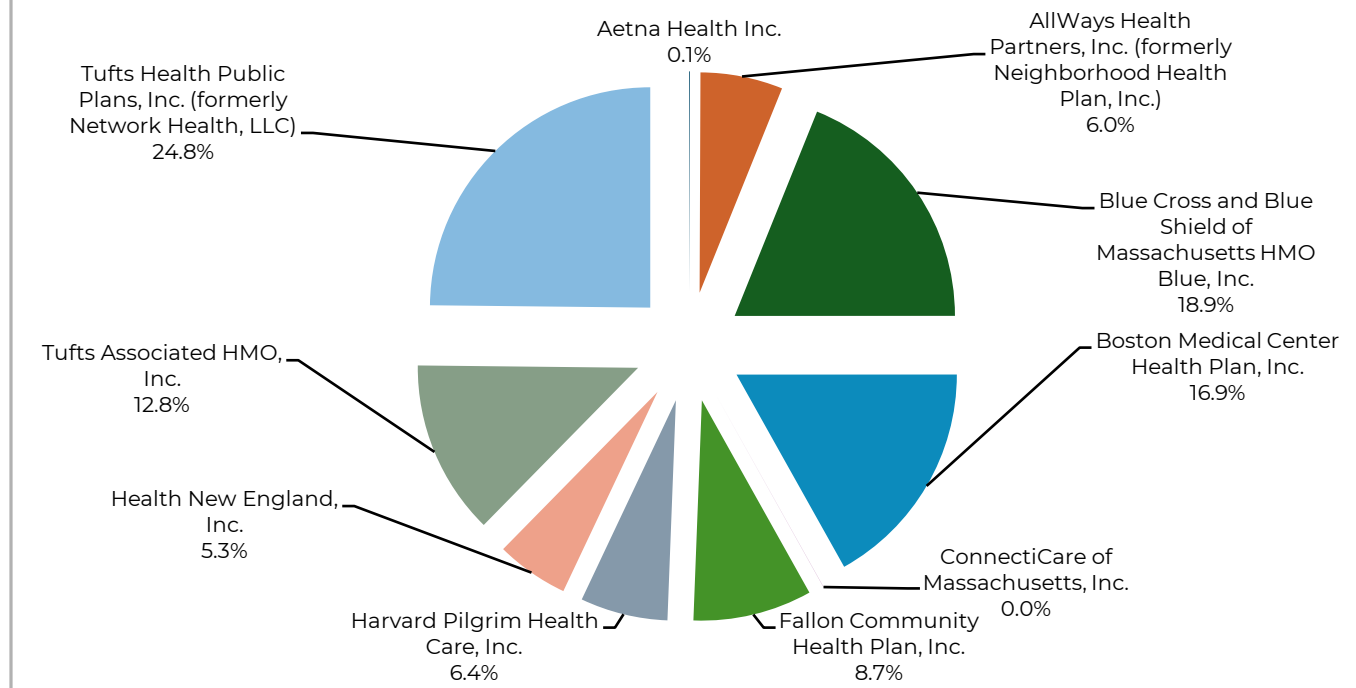
Along the way, the Managed Care Bureau coordinated conference calls and developed guidance and question and answer documents to assist insurance carriers, providers and consumers to understand how to obtain access to needed coverage under their plans. Until the coronavirus risk has been mitigated and the economy is able to revive, the Bureau of Managed Care is ready to respond to provide guidance so that carriers are taking all necessary steps to provide access to services that will stop the spread of the virus and provide all necessary treatment for those afflicted by the virus. In addition, the Bureau of Managed Care was involved in guidance developed for carriers to take all appropriate steps to be flexible with individuals and employers to maintain coverage by exploring ways to extend premium payments or grace periods where needed.

Managed Care

Health maintenance organizations ("HMO") 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 3rd quarter of 2020 is shown below.



HMO Market Share 3rd Quarter, 2020



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.

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 2019 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.

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, the Division issued a Bulletin in 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.

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 was produced in 2020 along with the development of proposed regulatory changes to accomplish the work of the task force.

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. Certain coverage requirements went into effect in 2019, while additionally services are covered starting in 2020. This work has continued during 2020 in collaboration with the Department of Mental Health.

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.

Health Care Access Bureau

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.

Risk Bearing Provider Organizations (RBPOs)

HCAB staff worked closely with the Legal and Financial staff to review 11 risk certification waiver applications as well as 37 risk certification applications to be effective between March 1, 2021 and February 28, 2022.

Analysis of Federal Health Market Rules

In 2020 the Division continued to work closely with other state agencies to analyze health market rules proposed by the federal government's Centers for Medicare and Medicaid Services to determine how these rules would impact the availability and affordability of coverage in Massachusetts. Where appropriate, the Division worked with other agencies and carriers to develop guidance that would assist carriers as they developed products and rates for the Massachusetts' merged market.

Small Group Rate Review and Medical Loss Ratio Rebates

During calendar year 2020, the Division reviewed Massachusetts small group carriers' filings submitted for 2nd quarter, 3rd quarter, and 4th quarter 2020 rates, as well as the rates to be effective for 1st quarter 2021. 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:

Quarter	Statewide Average Rate change
2Q20	+7.9
3Q20	+7.5
4Q20	+8.1
1Q21	+7.9

The Health Care Access Bureau reviewed carriers' annual merged market Medical Loss Ratio (MLR) rebate filings for the period 2017-2019 and calculated that there should be an overall rebate amount of over \$44 million returned to policyholders.

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 ensuring 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 2021 along with the development of proposed recommendations for future legislative or regulatory action.

Administrative Simplification

HCAB staff continued in 2020 to work with the Center for Health Information and Analysis (“CHIA”) toward the goal of sourcing health insurance data from CHIA’s All Payers Claim Database (“APCD”) instead of from insurer-generated data calls and reports. The focus in 2020 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, and reports are now provided every other quarter for use in assessing trends by carrier and in the market as a whole. It is hoped that 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.

Rate Review for Health-related Products

HCAB staff are responsible for the review of rates for a number of health-related products, in order to ensure compliance with applicable statutory requirements. They include:

- Long-term Care Insurance
- Specified Disease Insurance
- Accident Only Insurance
- Credit Life, Disability, and Involuntary Unemployment Insurance
- Disability Insurance
- Medicare Supplement Products

During 2020, rates for such products were either reviewed by internal staff or coordinated with external consulting actuaries (the latter in cases where the material is highly technical or controversial.) Associated retrospective experience submissions (e.g., Medicare Supplement Minimum Loss Ratio Reports) were also reviewed by staff for compliance with statutory or regulatory requirements.

COVID-19 related activities:

The HCAB conducted a number of special projects in order to monitor impacts of the pandemic on the health insurance marketplace and take action as necessary. Examples of

projects include special examinations to understand a monthly membership and utilization levels in order to assess the impact of changes on health coverage and a special examination of all carriers to ensure that provider reimbursement for COVID testing is at required levels. HCAB staff met frequently throughout the year with the major health carriers in order to gather perspectives relative to the state of the market as respects COVID-19 impacts. Finally, HCAB staff reviewed and approved requests from carriers to offer premium reductions or credits on health insurance and dental coverage, in order to fairly compensate insureds for the reduction in medical services for non-COVID treatments and dental procedures during the year.

Office of the General Counsel

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.

Primary Activities

- 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.

Hearings and Appeals

Massachusetts statutes require the Division to conduct hearings on a variety of matters. The Hearings and Appeals Unit consists of two hearing officers and a docket clerk who manage all aspects of the hearing process, from initial docketing to final decision. In any year, the case load may include:

- Insurance rates for workers' compensation insurance coverage
- Insurance rates for property insured through the Massachusetts Property Insurance Underwriting Association (the "FAIR Plan")
- Proposed new regulations or amendments to current regulations
- Disciplinary actions initiated by the Division against licensees
- Appeals from Division decisions denying license applications
- Matters relating to the residual market for automobile insurance managed by Commonwealth Automobile Reinsurers ("CAR"), including CAR's Rules of Operation and appeals from decisions of CAR's Governing Committee
- Appeals from employers about their workers' compensation insurance premiums
- Appeals from FAIR Plan decisions denying insurance coverage
- Insurance company mergers or acquisitions; and
- The state of the market for Medicare supplement insurance.

In addition, a Hearings and Appeals staff attorney is the Commissioner's designee to serve as chair of the Board of the Review in the Division of Insurance. That Board is authorized to hear disputes between medical service corporations and providers of health care services (M.G.L. c. 176A, §12), dental service corporations and participating dentists (M.G.L. c. 176E, §12), and optometric service corporations and participating optometrists (M.G.L. c. 176F, §12), as well as disputes involving legal service plans (M.G.L. c. 176H, §12).

2020 Hearings and Appeals Highlights

In 2020, the Division filed two new orders to show cause and Hearings and Appeals staff issued eleven decisions in enforcement actions filed in 2019. Nine of those decisions resulted in revocation of a producer's license; two actions were dismissed. In addition, a hearing on the December, 2019 filing by the Workers' Compensation Rating and Inspection Bureau of Massachusetts for a general revision of workers' compensation insurance risks and premiums was completed and a stipulation resolving the matter was approved in March, 2020.

Three financial matters were filed in 2020. Health Care Holdings, Inc., formerly known as Tufts Health Plan, sought approval of a proposed acquisition of Harvard Pilgrim Health Care and its subsidiaries. The required hearing was held by virtual means in early December and a decision approving the acquisition was issued later in that month. Hearings, to be held in January 2021, were scheduled in two other matters, the Proposed Acquisition of Control of Commonwealth Annuity and Life Insurance Company and First Allmerica Financial Life Insurance Company by the KKR Group, and the Proposed

Acquisition of Control of Coface North America Insurance Company by the Arch Group.

In December 2020, CAR submitted proposed amendments to the two sets of Performance Standards applicable to the handling of claims made, respectively, under commercial or private passenger motor vehicle policies. A hearing will be held early in 2021.

In 2017, the Point Insurance Agency appealed to the Commissioner a CAR decision that affirmed insurer procedures for determining eligibility for commercial insurance coverage through the residual market. In 2019, after the Commissioner upheld CAR's decision, Point appealed to the Superior Court. On May 28, 2020, the Superior Court issued a decision affirming the Commissioner's decision. Point appealed that decision to the Appeals Court where it was docketed but no further action was taken.

Two matters filed in prior years by employers questioning their workers' compensation insurance premiums were also resolved in 2020.

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 in 2018			
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			
None in 2020			

Distributions to Creditors

\$1,826,544.78 in distributions to Eastern Casualty Insurance Company's policyholders and creditors in New Hampshire and Rhode Island from deposits held in those states pursuant to agreements entered into by the Liquidator and the New Hampshire Insurance Commissioner and the Superintendent of the Rhode Island Department of Business Regulation, Insurance Division respectively were made in 2020.

Other Activities

Public Record Requests

The OGC provides the Records Access Officer for the Division and supervised and assisted in responding to more than 520 public records requests in 2020 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.

1033 Committee Reviews

In 2020, 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

Special Investigations

Mission

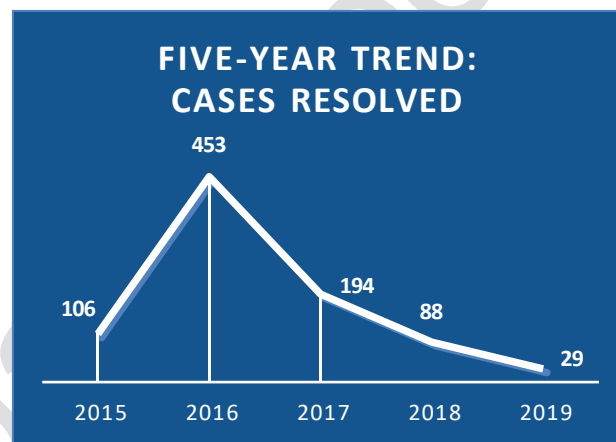
The Special Investigations Unit ("SIU") investigates allegations of misconduct by licensees and certain non-licensees and recommends enforcement action where appropriate. These

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.

2020 Accomplishments

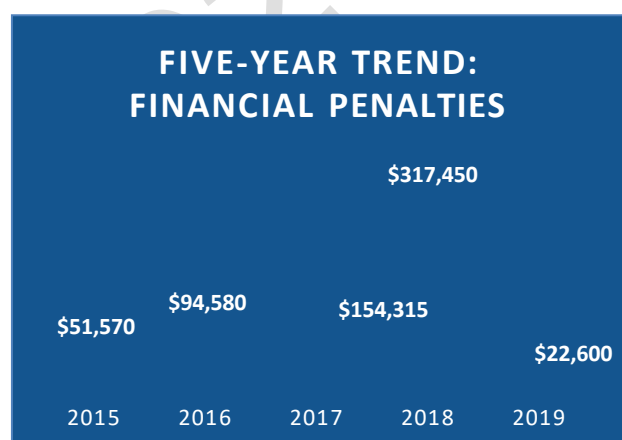
The SIU and enforcement sections closed a total of 63 cases in calendar year 2020. Common allegations investigated in this group of cases include:

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



Results among the 18 enforcement cases resolved in 2020 include the revocation of 10 individual producer licenses. There were 7 settlement agreements to cease and desist from improper conduct and/or from transacting insurance business in Massachusetts. There were 11 additional cease and desist orders issued by a Hearing Officer.

- Opened 50 investigations and referred 13 cases from the SIU to Enforcement.
- Assessed financial penalties in the amount of \$12,900.00.
- Scanned approximately 16 closed cases in its on-going project to digitize its closed inventory.



Board of Appeal

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.

Primary Activities

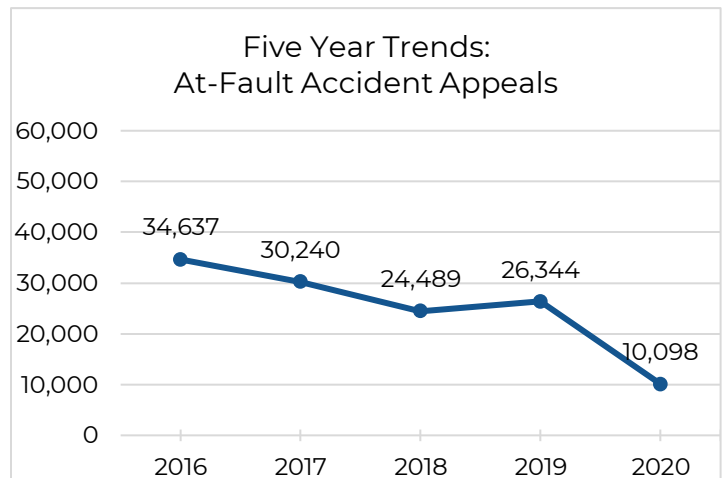
On average, the Board’s hearing officers hear approximately 25,000 – 40,000 at-fault accident determination appeal cases and 2,500 – 6,000 appeals of RMV actions per year. In 2020, the Board received 18,208 new appeals, with 10,098 live hearings scheduled. Due to the COVID-19 pandemic in 2020, the Board experienced a downturn in the amount of appeals received and hearings conducted as fewer drivers were on the roadways during this time. 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.

Hearings on At-fault Accident Determinations

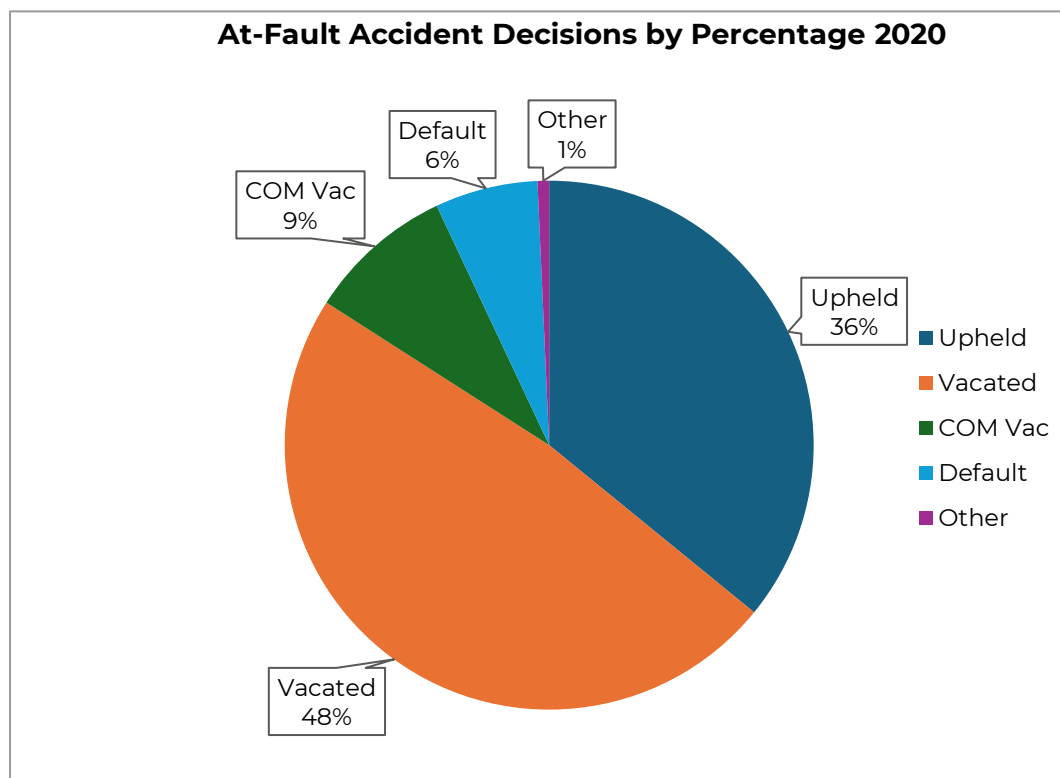
Each automobile insurance carrier administers a unique system of adjusting premiums based on an operator’s driving record. Typically, these merit rating plans decrease premiums for years of incident-free driving and increase premiums for operators with at-fault accidents or traffic citations. These premium 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 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 10,098 hearings on appeals of at-fault accident determinations in 2020.

Hearing Locations

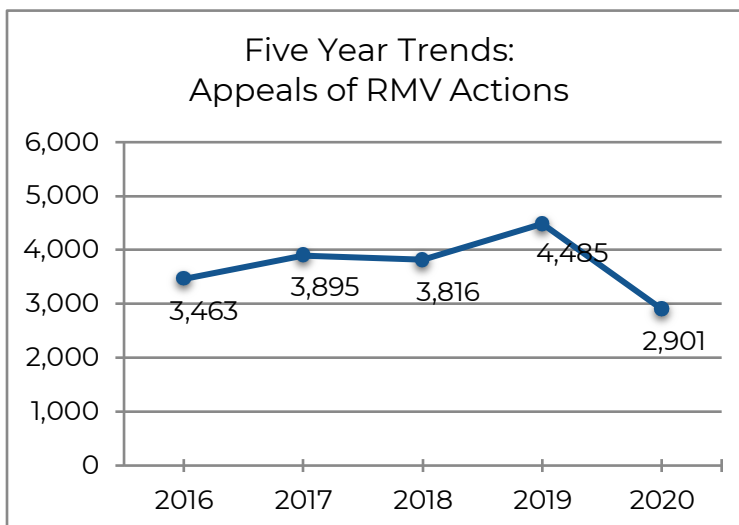
In order to provide greater convenience to consumers who need to schedule an appeal hearing, the Board held hearings at eleven satellite locations throughout the Commonwealth in addition to its primary office in Boston. In 2020, satellite locations included Dedham, Leominster, Marlboro, Peabody, Plymouth, Somerville, Somerset, Springfield, Waltham and Worcester. Due to the COVID-19 pandemic, however, the Board of Appeal solely conducted "Administrative Hearings" beginning on March 15, 2020 through to the end of December 2020.

BOSTON	257
DEDHAM	666
LEOMINSTER	330
MARLBORO	117
PEABODY	308
PLYMOUTH	309
SOMERVILLE	895
SOMERSET	338
SPRINGFIELD	587
WALTHAM	422
WORCESTER	557

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 2020, the Board received 2,486 RMV hearing appeal requests and conducted and decided 2,901 hearings on appeals from RMV decisions. Due to the COVID-19 pandemic, the Board used a hybrid system for hearings in 2020. Of the 2901 hearings decided in 2020, the Board conducted 1090 in-person hearings, 498 administrative hearings and 1303 virtual hearings.



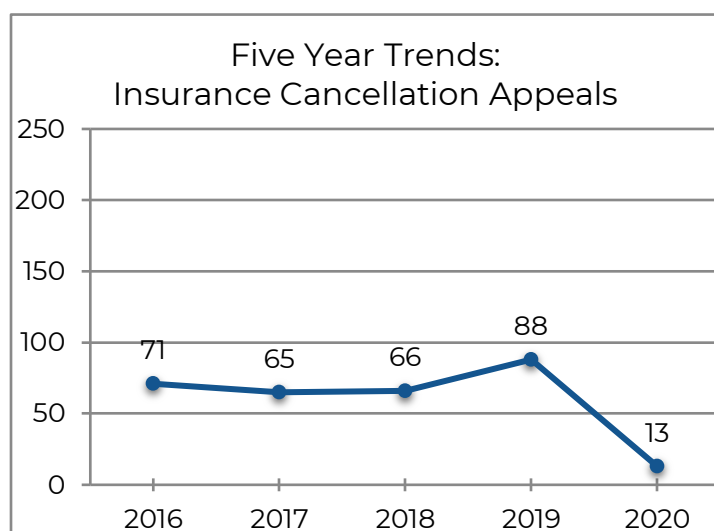
Breakdown of Types of RMV Appeals Heard and Decided by the Board in 2020

Interlock Violations	66
Interlock Device	48
Operating Under the Influence	540
4 yr. loss Habitual Traffic Offender	1
Immediate Threat	312
Drug Charge	6
30 day suspension/Handicap Placard Misuse	1
30 day suspension/3 Speeding Tickets	58
45 day suspension/5 Surchargeable Events	1
60 day suspension/Driving to Endanger/Recklessly	437
60 day suspension/7 Surchargeable Events	242
CDL Loss	47
Complaint Fraudulent License	146
Operating After Suspension	61
Inspection Sticker	9
Inspector	3
Handicap Placard Refusal	24
Fatal Accident Preliminary	5

Vehicular Homicide	2
Leaving the Scene/Property damage	20
Leaving the Scene/Personal injury	4
Medical Problem	61
Student Transport 7D License	5
JOL Speeding	112
No Insurance	20
Tinted Windows	4
<u>Other</u>	575
TOTAL	2810

Note: The total number of RMV decisions rendered in 2020 will vary from the total number of RMV appeal requests received in 2020, based on appeal requests received in 2019 that were decided in 2020 or appeal requests received in 2020 that were not decided in 2020.

Automobile Insurance Cancellation



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 filed timely, 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 13 insurance cancellations appeals heard in 2020.

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.

Automobile Damage Appraiser Licensing Board

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.

Because of the COVID-19 pandemic, the Emergency Orders issued by the Governor to curtail gatherings of large groups of people at public events, the inability of the Board to hold public meetings or hearings, and Due Process rights granted to licensed motor vehicle damage appraisers under Massachusetts Law, the ADALB did not process any complaints filed against licensed appraisers in 2020. The ADALB anticipates that it will be able to hold public meetings in 2021, at which time complaints will be processed and reviewed during the public meetings of the ADALB.

In 2020, the ADALB issued 108 new licenses and approved 4,922 license renewals. It held 3 exams in 2020, which were taken by 147 applicants.

Consumer Services

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.

2020 Goals

- Investigate the majority of complaints within five months of receipt.
- Timely provide a customized and comprehensive response to all consumer inquiries.
- 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 Market Conduct and Special Investigation Units on notable concerns.

2020 Accomplishments

- CSU staff handled approximately 100 formal written information requests. The majority of questions from consumers concerned continuation of coverage, company contact information, denied claims, claim settlement delays, and premium rates.
- Insurance examiners received 2,005 new formal complaints and investigated and closed 2,575 cases.
- CSU resolved most complaint investigations within an average of 70 days of receiving the full complaint file and recovered \$5,459,807.76 on behalf of consumers.

Consumer Hotline

Insurance consumers can receive personalized assistance from the CSU by calling the consumer hotline Monday through Friday, 8:45 am to 5:00 pm. As a result of the Division's offices being closed during the COVID-19 public health crisis, consumers were encouraged to leave a voicemail, and a member of the Consumer Services Unit returned the call within 24 hours.

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 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 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 170 formal written complaints each month in 2020. Below are the 5 top reasons for complaints, as well as the top 5 companies complained against in 2020.

Top 5 Reasons for Complaints in 2020 – All Complaints

- 1) Denial of Claim
- 2) Claim Delay
- 3) Unsatisfactory Settlement/Offer
- 4) Premium & Rating
- 5) Cancellation

Top 5 Companies Complained Against in 2020– All Complaints

- 1) Commerce Insurance Company (MAPFRE insurance group)
- 2) Blue Cross and Blue Shield of Massachusetts, Inc. (BCBSMA)
- 3) Government Employees Insurance Company (GEICO)
- 4) Dental Service of Massachusetts, Inc. (Delta Dental of Massachusetts)
- 5) LM General Insurance Company (Liberty Mutual insurance group)

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 in 2020. These materials deliver information on relatively complicated insurance topics in a manner that is accessible and easily understood by consumers.

- Consumer advisory on the NAIC Life Insurance Locator Tool. At least once per week, CSU receives an inquiry from Massachusetts consumers wondering how to find a loved one's missing life insurance policy. Since its inception in 2016, the NAIC Life Insurance Locator Tool has matched over 81,349 requests nationwide with claim amounts totaling over one billion.
- Consumer advisory on the risks of purchasing a health plan that is not approved by the Division of Insurance during open enrollment. As consumers across the state began to experience unemployment and the loss of employer-sponsored health care, it was necessary to help consumers understand how to find the plan right for them and not purchase health insurance that would not meet their needs.

- Consumer advisory on travel insurance. In March, as the COVID-19 public health crisis accelerated, CSU prepped for an increase in travel-insurance related complaints as travel planned for upcoming months began to be cancelled.
- Consumer advisory on severe weather events and hurricane season. Massachusetts experienced several significant weather events during the summer of 2020, with hail, strong winds and heavy, localized rainfall. While many residents were impacted by these storms fortunately did not have substantial damage, these weather events serve as a timely reminder for consumers to know what their policy does and does not cover and how to better prepare their homes for severe weather.

COVID-19 Response

The Division recognized early in the COVID-19 public health crisis that both consumers and businesses throughout Massachusetts may struggle with many economic and resource challenges resulting from the pandemic. As a result, and throughout 2020, the Division issued 31 Bulletins to promote clarity and consistency across the insurance market, establishing expectations for insurance companies and instructing them on how to meet the insurance needs of Massachusetts residents during the COVID-19 public health crisis. The Division developed and updated its website with a comprehensive list of frequently asked questions (FAQs) pertaining to testing for and treatment of the virus, including limits to cost-sharing and prior authorizations requirements. CSU staff responded to numerous consumer/provider inquiries about telehealth, and questions about COVID-19 testing, treatment and vaccines. In all cases, staff helped consumers to understand DOI and other state websites so that consumers could best learn how to get appropriate access to COVID-19 testing, treatment and vaccines under their health coverage.

CSU staff responded to consumer complaints regarding cancellation or non-renewal of coverage and required insurers to explain how their actions were consistent with Bulletin 2020-05—and subsequent Bulletin 2020-30—in providing their policyholders with as much flexibility as possible during the period to maintain their existing coverage,(e.g., relax due dates for premiums payments; extend grace periods; waive late fees, non-sufficient funds fees, installment fees and penalties; allow payment plans for premiums payments; assist affected policyholders to find ways that insurance policies do not lapse; and consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage).

Administration

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.

2020 Goals

- Complete billing of assessments according to timelines 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

2020 Acts

Chapter 227 – AN ACT MAKING APPROPRIATIONS FOR THE FISCAL YEAR 2021 FOR THE MAINTENANCE OF THE DEPARTMENTS, BOARDS, COMMISSIONS, INSTITUTIONS AND CERTAIN ACTIVITIES OF THE COMMONWEALTH, FOR INTEREST, SINKING FUND AND SERIAL BOND REQUIREMENTS AND FOR CERTAIN PERMANENT IMPROVEMENTS

Sections 48 through 51 of the Act amended M.G.L. c. 175, § 46B; M.G.L. c. 176A, § 8A; M.G.L. c. 176B; § 4B and M.G.L. c. 176G, § 4M to prohibit insurers from denying coverage for any behavioral health services or any evaluation and management office visit only because the services and visit were delivered on the same day in the same practice or facility, unless the services, evaluation and management office visit were delivered by the same provider or by providers of the same specialty. The Division of Insurance will provide guidance for the implementation of these requirements.

Section 52 of the Act amended M.G.L. c. 176O by adding a new section 29 to require that the Bureau of Managed Care develop and implement standard credentialing forms for health care providers. The Bureau must promulgate regulations creating uniform standards and methodologies for credentialing. The regulations must include requirements that in conducting a credential review, a carrier, or any entity that manages or administers benefits for a carrier, will use and accept only the credentialing forms designated by the Commissioner, and the carrier will also review and respond to a credentialing form not more than 20 business days after receiving a completed request from a provider.

Nothing prohibits a carrier or a benefits manager for a carrier from using an electronic-based credentialing methodology instead of a paper form. A carrier or its benefits manager must provide a paper credentialing form to a health care provider if the provider requests it.

A carrier or a benefits manager for a carrier that performs or contracts for performance of the required functions is responsible for compliance with these requirements. The carrier shall be responsible for remedying a failure by the contracted entity to meet the requirements of this subsection and is subject to any penalties for failing to comply.

Chapter 260 - AN ACT PROMOTING A RESILIENT HEALTH CARE SYSTEM THAT PUTS PATIENTS FIRST

Chapter 46 of the Act repealed M.G.L. c. 175, § 47BB, regarding coverage for telemedicine.

Chapter 47 of the Act created two new sections to M.G.L. c. 175. New section M.G.L. c. 175, § 47MM defines “behavioral health services” and “telehealth” and requires individual and group plans issued under M.G.L. c. 175, to cover telehealth services if those services are

offered in-person and if it is appropriate to offer those services by telehealth. Behavioral health services offered by telehealth must be reimbursed at the same level as if those services were provided in-person.

New section M.G.L. c. 175, §47NN requires coverage for the treatment of pediatric autoimmune neuropsychiatric disorders associated with streptococcal infections and pediatric acute-onset neuropsychiatric syndrome. Such treatment must include, but is not limited to, the use of intravenous immunoglobulin therapy.

Section 48 of the Act amended M.G.L. c. 176A by adding new section 80O that requires contracts issued between corporations organized under M.G.L. c. 176A and subscribers to include coverage for the treatment of pediatric autoimmune neuropsychiatric disorders associated with streptococcal infections and pediatric acute-onset neuropsychiatric syndrome. Treatment must include but not be limited to the use of intravenous immunoglobulin therapy.

Section 49 of the Act amended M.G.L. c. 176A by adding a new section 38 regarding telehealth. The section defines “behavioral health services” and “telehealth” and requires that individual and group plans issued under M.G.L. c. 176A cover telehealth services if those services are offered in-person and if it is appropriate to offer those services by telehealth. Behavioral health services offered by telehealth must be reimbursed at the same level as if those services were provided in-person.

Section 50 of the Act amended M.G.L. c. 176B by adding a new section 40O that requires contracts issued between corporations organized under M.G.L. c. 176B and subscribers to include coverage for the treatment of pediatric autoimmune neuropsychiatric disorders associated with streptococcal infections and pediatric acute-onset neuropsychiatric syndrome. Treatment must include but not be limited to the use of intravenous immunoglobulin therapy.

Section 51 of the Act amended M.G.L. c. 176B by adding a new section 25 regarding telehealth. The section defines “behavioral health services” and “telehealth” and requires that individual and group plans issued under M.G.L. c. 176B cover telehealth services if those services are offered in-person, and if it is appropriate to offer those services by telehealth. Behavioral health services offered by telehealth must be reimbursed at the same level as if those services were provided in-person.

Section 52 of the Act amended M.G.L. c. 176G by adding new section 4GG that requires that any individual or group HMO contract shall provide coverage for treatment of pediatric autoimmune neuropsychiatric disorders associated with streptococcal infections and pediatric acute-onset neuropsychiatric syndrome. Such treatment must include but not be limited to the use of intravenous immunoglobulin therapy.

Section 53 of the Act added new section 33 to M.G.L. c. 176G regarding telehealth. The new section defines “behavioral health services” and “telehealth” and requires that individual and group contracts issued under M.G.L. c. 176G cover telehealth services if those services are offered in-person, and if it is appropriate to offer those services by telehealth. Behavioral health services offered by telehealth must be reimbursed at the same level as if

those services were provided in-person.

Section 54 of the Act amended M.G.L. c. 176I by adding new section 13. Section 13 defines “behavioral health services” and “telehealth” and requires that individual and group contracts issued under M.G.L. c. 176I cover telehealth services if those services are offered in-person, and if it is appropriate to offer those services by telehealth. Behavioral health services offered by telehealth must be reimbursed at the same level as if those services were provided in-person.

Section 55 of the Act amended section 1 of M.G.L. c. 176O by adding the definition of “behavioral health services”, which are services for the care and services for the evaluation, diagnosis, treatment or management of patients with mental health, developmental or substance use disorders.

Section 56 of the Act amended section 1 of M.G.L. c. 176O by adding the definition of “chronic disease management”, which is care and services for the management of chronic conditions that include diabetes, chronic obstructive pulmonary disease, asthma, congestive heart failure, hypertension, history of stroke, cancer and coronary artery disease.

Section 57 of the Act amended section 1 of M.G.L. c. 176O by adding a definition of “primary care services”, which are services delivered by a primary care provider.

Section 58 of the Act amended section 2 of M.G.L. c. 176O which governs the accreditation of health insurers by the Bureau of Managed Care. The new language requires the Bureau of Managed Care to establish minimum standards for 1) pain management services and 2) behavioral health services, chronic disease management, and primary care services by telehealth.

Section 59 of the Act amended M.G.L. c. 176O, § 2(b) to require that the Bureau of Managed Care when establishing minimum standards for the accreditation of carriers in regard to access to behavioral health services, chronic disease management and primary care services via telehealth consult with the Health Policy Commission and the Center for Health Information and Analysis.

Section 60 of the Act made a grammatical change related to an amendment made in Section 61.

Section 61 of the Act amended M.G.L. c. 176O, § 6 regarding evidence of coverage. Carriers must provide a summary description of an insured’s telehealth coverage and access to telehealth services, including behavioral health services, chronic disease management and primary care services through telehealth, as well as the technology available to access telehealth services.

Section 62 amended M.G.L. c. 176O, § 23 by adding the requirement that carriers disclose the network status of providers.

Section 66 provides that for the purposes of most of the state health insurance statutes, network adequacy may be met through significant reliance on telehealth providers until

the termination of the Governor's March 10, 2020 declaration of a state of emergency.

Section 67 provides that the Health Policy Commission, in consultation with the Center for Health Information and Analysis, the Executive Office of Health and Human Services and the Division of Insurance shall report on the use of telehealth services in the Commonwealth and the effect of telehealth on health care access and system cost. Specific data must be included in the report such as the use of telehealth by patient demographics and geographic regions, barriers to the increased use of telemedicine, the estimated savings or costs of increased use of telemedicine as well as several other specific telehealth issues.

Section 68 requires the Group Insurance Commission, Division of Medical Assistance and health carriers to ensure that rates of payment for in-network providers for telehealth services are no different from the rates paid for in-person treatment. This section will be repealed by Section 77, which under Section 79 becomes effective 90 days after the expiration of Governor Baker's March 10, 2020, declaration of state of emergency.

Section 69 provides that the rate of payment for in-network providers of chronic disease management delivered via telehealth shall not be less than the rate of payment for the same service delivered via in-person methods.

Section 70 of the Act requires that the Group Insurance Commission, Division of Medical Assistance and all health carriers provide coverage, without any requirement for cost sharing by the insured, for all emergency, inpatient services and cognitive rehabilitation services, including all professional, diagnostic and laboratory services, related to the 2019 novel coronavirus, also known as COVID-19, at both in-network and out-of-network providers.

Section 71 of the Act requires that the Secretary of Health and Human Services, in consultation with the Health Policy Commission, the Center for Health Information Analysis and the Division of Insurance, develop a report and make recommendations regarding a noncontracted, out-of-network commercial payment rate for emergency health care services and a noncontracted, out-of-network commercial payment rate for non-emergency health care services in the Commonwealth. The section set out the specific parameters of the report and requires that it be completed and be submitted to the Joint Committee on Health Care Financing and the House and Senate Committees on Ways and Means not later than September 1, 2021.

2020 Regulations

211 CMR 26.00 - ANNUAL FINANCIAL REPORTING FOR YEARS ENDING 2010 AND AFTER

The regulation was amended to include requirements for the internal audit functions of insurance companies to conform to the requirements of NAIC Model Regulation #205.

2020 Bulletins

Bulletin 2020-01 - Addendum to “2020 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 2020-02 – Addressing COVID-19 (Coronavirus) Testing and Treatment

This Bulletin was issued to provide information to health carriers about the coverage of testing and treatment for COVID-19. The Bulletin sets out the Division’s expectations for health carriers regarding prevention, testing and treatment options in accordance with the Massachusetts Department of Public Health and the federal Centers for Disease Control and Prevention, as well as guidelines for when to contact the local board of health or your health care provider. It includes the Division’s specific expectations for carriers regarding, but not limited to, telehealth, prior approval requirements, cost sharing and copayments.

Bulletin 2020-03 – Special Open Enrollment Period Effective Immediately Until April 25

This Bulletin was issued in collaboration with the Commonwealth Health Insurance Connector Authority for individuals in the Commonwealth not currently enrolled in a health insurance plan. In light of the spread of COVID-19, individuals without health insurance may enroll through a special open enrollment period through April 25, 2020.

Bulletin 2020-04 - Emergency Measures to Address and Stop the Spread of COVID-19 (Coronavirus)

This Bulletin was issued to supplement and at times supersede the provisions of Bulletin 2020-02. The Bulletin provides guidance to health carriers relative to the implementation of Governor Baker’s March 16, 2020, Emergency Order expanding access to telehealth and protecting health care providers. The Bulletin provides guidelines so that the cost of testing, diagnosing and treating COVID-19 infections are not barriers to Massachusetts residents. The use of telehealth should be expanded for medically necessary treatment of covered health conditions so that the transmission of COVID-19 will be reduced by limiting the number of face-to-face office visits with health care providers.

Bulletin 2020-05 – Flexibility in the Issuance and Administration of Insurance during COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to all insurance carriers regardless of line of coverage and self-insurance groups advising them to provide employers and covered individuals with as much flexibility as reasonable to maintain existing coverage. The need for flexibility is due to concerns over insureds' ability to remit timely premium payments during the COVID-19 public health crisis.

Bulletin 2020-06 – Administration of Prescription Drug Benefits during COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to health carriers regarding the Division's expectations for steps carriers should take to protect pharmacists and the public during the COVID-19 public health crisis. Carriers are advised to provide flexibility in the administration and delivery of prescription drug coverage, such as eliminating signature requirements for prescriptions, facilitating in-home or mailed prescription deliveries and to permit early refills. In addition, the Bulletin also provides the Division's expectations in regard to prior authorizations systems for the prescription drugs chloroquine and hydroxychloroquine.

Bulletin 2020-07 – Making Consumer Information Available during the COVID-19 Crisis

This Bulletin was issued to provide steps health carriers can take to educate consumers on how to use carriers' systems to obtain covered services for COVID-19 testing, diagnosis and treatment and how carriers can most efficiently process claims. The Bulletin advises carriers of certain information that must be provided to consumers either by phone service lines or on carriers' websites.

Bulletin 2020-08 – Flexibility in the Issuance and Administration of Medical Malpractice Insurance during COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to carriers offering medical malpractice coverage asking that they review existing coverages to ensure policies provide flexibility in coverage to health care providers providing treatment during the COVID-19 public health crisis.

Bulletin 2020-09 – Special Enrollment Period Effective Immediately until May 25

This Bulletin was issued to extend the open enrollment period granted in Bulletin 2020-03 to qualified individuals until May 25 in light of the ongoing COVID-19 public health crisis. This Bulletin was issued in collaboration with the Commonwealth Health Insurance Connector Authority.

Bulletin 2020-10-Credentialing and Prior Authorization during COVID-19 (Coronavirus) Health Crisis

This Bulletin was issued to provide information to health carriers regarding steps carriers are to take to ensure insureds can obtain medically necessary treatment during the COVID-

19 public health crisis. Carriers are encouraged to take advantage of the Governor Baker's emergency orders to permit covered providers to practice in different health care facilities than their usual facilities to prevent health care facilities from being overwhelmed.

Bulletin 2020-11- Flexibility for Compliance with Certain Filing Requirements in Light of COVID-19

This Bulletin was issued to inform all insurers about flexibility in the submission of certain required regulatory filings during the COVID-19 public health crisis. These filings include annual statements, insurance holding company filings, Form D filings, and the granting of extensions for Form B and F filings. The filing deadlines for certain other required submissions and reports were also extended.

Bulletin 2020-12-Individual Insurance Licensing during the COVID-19 (Coronavirus) Health Crisis

This Bulletin was issued to implement Governor Baker's March 18, 2020 Order extending the registrations of certain licensed professionals to provide those individuals licensed by the Division with information about the Division's efforts to address concerns about licensing during the COVID-19 health crisis.

Bulletin 2020-13-Coverage for COVID-19 Treatment and Out-of-Network Emergency and Inpatient Reimbursement during the COVID-19 Health Crisis

This Bulletin was issued to provide health carriers with information regarding appropriate coverage of treatment for COVID-19. This Bulletin also provides guidance to carriers regarding how to implement Governor Baker's April 9, 2020, Order expanding access to inpatient services.

Bulletin 2020-14 – Temporary Individual Producer Licenses during the COVID-19 (Coronavirus) Health Crisis

This Bulletin was issued to address the impact the COVID-19 health crisis might have on individuals interested in becoming licensed insurance producers in Massachusetts and sets out the requirements for new applicants to get temporary insurance producer licenses without requiring an examination.

Bulletin 2020-15 – Relaxing Certain Health Plan Administrative Procedures during the COVID-19 Health Emergency

This Bulletin was issued to health carriers to supplement prior Bulletins regarding steps carriers should take to streamline utilization review and other administrative processes during the public health crisis.

Bulletin 2020-16 – COVID-19 (Coronavirus) Testing

This Bulletin was issued to health carriers to inform them of the Division's expectations regarding the various types of medically necessary testing to diagnose or treat Coronavirus or other covered health conditions. Those expectations include relaxing prior approval requirements for testing in accordance with CDC and DPH guidelines, relaxing out of network requirements when treatment is not available in network, eliminating certain prior approval requirements and foregoing any cost sharing for medically necessary testing and counseling.

Bulletin 2020-17 – Flexibility in the Administration of Vacancy Clauses during COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to provide information to all insurance companies issuing property & casualty coverage in Massachusetts regarding steps they should take to address vacancy provisions in property policies during the public health crisis. Many businesses were not considered essential businesses, leading to their closing and their properties being unoccupied during the COVID-19 public health crisis. The Division expects carriers to be flexible in administering vacancy provisions in policies and to exclude days properties are vacant due to the Governor's Emergency Orders.

Bulletin 2020-18 – Special Enrollment Period Effective Immediately until June 23, 2020

This Bulletin was issued to extend the open enrollment period described in Bulletins 2020-03 and 2020-09 to permit uninsured residents additional time to enroll in health insurance plans. This Bulletin was issued in collaboration with the Commonwealth Health Insurance Connector Authority.

Bulletin 2020-19 – Flexibility with Early Intervention Services Due to the COVID-19 Health Emergency

This Bulletin was issued to provide information to health carriers regarding the Division's expectations regarding carrier flexibility in the administration of Early Intervention services. Emergency Orders issued in light of the pandemic and the impact on schools have delayed evaluations for early intervention services. The Division expects carriers to extend early intervention coverage in certain circumstances for children meeting certain criteria.

Bulletin 2020-20 – Special Open Enrollment Period Effective Immediately until July 23, 2020

This Bulletin was issued to extend until July 23, 2020 the open enrollment period described in Bulletins 2020-03, 2020-09 and 2020-18 for eligible individuals not currently enrolled in a

health plan. This Bulletin was issued in collaboration with the Commonwealth Health Insurance Connector Authority.

Bulletin 2020-21- Continued Relaxation of Prior Authorization Procedures in Response to the COVID-19 Health Emergency

This Bulletin was issued to health carriers concerning the required need to relax prior authorization procedures in response to the COVID-19 public health crisis. Until September 30, 2020, the Division expects carriers to forego prior authorization reviews for any scheduled surgeries and for behavioral and non-behavioral health admissions. Carriers are also expected to exhibit flexibility in other administrative processes as outlined in the Bulletin.

Bulletin 2020-22- Procedures Associated with the Weather Event in Norwood, MA and Its Vicinity on June 28, 2020

This Bulletin was issued to remind carriers of their obligations in light of the significant weather event that occurred in Norwood, Massachusetts on June 28, 2020. Carriers must promptly investigate all claims and issue prompt coverage decisions. Carriers may not cancel, re-rate, non-renew or underwrite based on the June 28 weather event.

Bulletin 2020-23 – Updated Guidance for COVID-19 (Coronavirus) PCR and Antigen Testing

This Bulletin was issued to supplement information contained in prior Bulletins regarding testing for COVID-19. Carriers are required to cover PCR or antigen testing for members who are symptomatic, who have had close contact with COVID-19 positive or symptomatic people, and anyone regardless of symptoms on inpatient admission to a health care facility.

Bulletin 2020-24 – Continued Flexibility for Compliance with Certain Filing Requirements in Light of COVID-19

This Bulletin was issued to all insurance companies and other businesses required to make filings with the Division to provide continued flexibility in the submission of certain regulatory filings during the COVID-19 public health crisis.

Bulletin 2020-25 – Easing Administrative Billing for PCR and Antigen Testing

This Bulletin was issued to health carriers to update prior Bulletins regarding COVID-19 testing and to provide information about the Division's expectations regarding Carriers' easing administrative billing for COVID-19 testing. Carriers are expected to permit and pay for covered tests by laboratories with which they do not yet have an administrative relationship.

Bulletin 2020-26 – Massachusetts Requirement that Carriers Cover Certain Contraceptive Services Without Consumer Cost-Sharing

This Bulletin was issued to health carriers to rescind Bulletin 2016-03, which informed health carriers of a federal requirement to cover certain contraceptives without cost-sharing. The Bulletin also reminds carriers that Massachusetts law contains requirements for carriers to cover certain contraceptives without cost-sharing, as provided by Chapter 120 of the Acts of 2017.

Bulletin 2020-27 – Guidance Regarding Open Enrollment Period for Benefit Year 2021

This Bulletin was issued in collaboration with the Health Connector regarding a special open enrollment period from November 1, 2020 to January 23, 2021. To ensure that the open enrollment dates both on and off the Connector are the same, the 2021 benefit-year open enrollment on for the commercial non-group market will be also run from November 1, 2020 to January 23, 2021.

Bulletin 2020-28 – Continued Relaxation of Certain Administrative Procedures in Response to the COVID-19 Health Emergency

This Bulletin was issued to health carriers about the Division's expectations regarding the continued need to relax prior authorization procedures in response to the COVID-19 public health crisis. Additionally, carriers should not conduct retroactive reviews and deny as not medically necessary emergency or inpatient hospital services that were provided to treat COVID-19 during the State of Emergency.

Bulletin 2020-29 – Individual Insurance License Extensions Granted during the COVID-19 (Coronavirus) Health Crisis

This Bulletin was issued in response to Governor Baker's June 26, 2020 COVID-19 Order No. 41 as it related to individual insurance licenses issued by the Division. Pursuant to the Bulletin individuals that had been granted renewal extension time due to the COVID-19 health crisis were required to renew their licenses by December 31, 2020, as well as complete their continuing education requirements by that date.

Bulletin 2020-30 – Continued Flexibility in the Issuance and Administration of Insurance during the COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to remind carriers across all lines of coverage and self-insurance groups to continue to provide flexibility to their insureds to allow them to retain coverage during the COVID-19 public health crisis.

Bulletin 2020-31 – Continued Flexibility in Efforts to Treat and Restrict the Spread of COVID-19

This Bulletin was issued to remind carriers of their obligations to provide flexibility and coverage for the testing and treatment of COVID-19. The Division expects carriers to provide flexibility to their members for the testing, treatment and vaccines for COVID-19 and reminds carriers of the expectations the Division provided in prior Bulletins.

Bulletin 2020-32 – Addressing COVID-19 (Coronavirus) Vaccines

This Bulletin was issued to health carriers regarding the Division's expectations relative to appropriate coverage for COVID-19 vaccines. Carriers' members are expected to have access to coverage for COVID-19 vaccines, and the cost of a vaccine may not be a barrier to obtaining a vaccine. Carriers must provide information to covered individuals to assist them in obtaining a vaccine.

Bulletin 2020-33 - Flexibility in the Issuance and Administration of Liquor Liability and Workers' Compensation Insurance during the COVID-19 (Coronavirus) Public Health Crisis

This Bulletin was issued to provide information to carriers selling liquor liability and workers' compensation coverage about the Division's expectations regarding the insurance-related provisions of COVID-19 Order No. 53 issued by Governor Baker on November 2, 2020 which noted that liquor licensees that remained closed due to the COVID-19 public health crisis would not have to provide proof of liquor liability or workers' compensation insurance in order to renew licenses issued under M.G.L. c. 138, § 12 but must provide proof of appropriate insurance on re-opening.

Appendix B: Select Financial Information from Massachusetts Domestic Insurance Companies

Property & Casualty Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2020	Total Premium Written 2020	Total Net Assets as of 12/31/2020	Total Liabilities as of 12/31/2020	Total Surplus as of 12/31/2020
10017	Arbella Ind Ins Co	\$25,073,425	\$26,378,695	\$60,787,280	\$38,388,892	\$22,398,389
10206	Medical Professional Mut Ins Co	63,657,224	63,657,224	3,519,281,893	1,955,645,619	1,563,636,274
10394	Plymouth Rock Home Assur Corp	40,265,166	64,472,964	120,340,940	56,774,508	63,566,432
10664	Endeavour Ins Co	3,880,184	3,880,184	6,683,143	10,417	6,672,726
11104	Associated Employers Ins Co	34,925,135	36,903,405	6,683,947	436,718	6,247,229
11984	Independence Cas Ins Co	21,369,023	21,369,023	5,000,940	8,483	4,992,456
12154	Encompass Ins Co of MA	-	-	5,752,563	30,301	5,722,262
12725	New England Mut Ins Co	8,252,742	10,684,189	48,565,500	3,382,560	45,182,940
12808	Safety Prop & Cas Ins Co	25,681,550	26,474,363	55,908,492	28,523,019	27,385,473
12886	Massachusetts Employers Ins Co	12,431,238	12,431,238	4,668,056	785,135	3,882,921
13163	Hospitality Mut Ins Co	3,408,443	3,408,443	57,040,569	37,102,349	19,938,220

13374	Arrow Mut Liab Ins Co	5,525,054	5,787,037	46,353,267	14,754,074	31,599,193
13463	Barnstable Cnty Mut Ins Co	26,949,352	26,949,352	130,953,566	30,714,965	100,238,601
13643	Bunker Hill Ins Cas Co	12,560,421	12,560,421	34,330,152	21,465,694	12,864,458
13706	Dorchester Mut Ins Co	41,431,209	41,629,320	114,916,929	56,673,649	58,243,280
13943	Fitchburg Mut Ins Co	1,220	34,265,169	161,244,854	78,423,368	82,821,486
14192	Hingham Mut Fire Ins Co	10,325,259	10,325,259	74,737,549	26,309,437	48,428,112
14486	Liberty Mut Mid Atlantic Ins Co	-	166,754,313	23,589,383	1,659,877	21,929,506
14613	Montgomery Mut Ins Co	405,039	136,834,003	56,164,434	165,279	55,999,155
14737	Plymouth Rock Assur Corp	361,157,919	394,702,634	987,284,124	553,347,664	433,936,460
15067	Quincy Mut Fire Ins Co	167,416,468	224,386,690	2,011,416,352	714,788,716	1,296,627,636
16035	Bunker Hill Preferred Ins Co	14,989,107	14,989,107	34,316,689	22,145,455	12,171,234
16036	Bunker Hill Prop Ins Co	11,617,093	11,617,093	33,196,145	21,046,463	12,149,682
16037	Bunker Hill Ins Co	14,266,561	14,266,561	33,891,349	21,736,431	12,154,918
16375	AllWays Health Partners Ins Co	14,593,116	14,593,116	27,560,471	23,752,515	3,807,956
17000	Arbella Mut Ins Co	545,211,947	545,211,947	1,687,730,504	851,224,590	836,505,913
19763	Bay State Ins Co	70,701,195	100,059,037	681,065,283	248,891,456	432,173,825
19771	Cambridge Mut Fire Ins Co	22,498,138	143,445,747	1,149,981,942	511,057,695	638,924,248
19798	Merrimack Mut Fire Ins Co	148,502,860	374,133,204	1,926,288,739	728,411,297	1,197,877,442
21261	Electric Ins Co	21,591,262	219,928,667	1,169,945,007	783,052,738	386,892,269
21750	Pilgrim Ins Co	58,882,606	58,882,606	130,152,409	92,030,355	38,122,054
23043	Liberty Mut Ins Co	324,728,061	2,552,879,605	58,048,967,865	39,029,092,737	19,019,875,128
23965	Norfolk & Dedham Mut Fire Ins Co	178,050,271	188,887,871	522,876,235	257,827,089	265,049,146
31887	Coface N Amer Ins Co	2,508,523	120,676,481	155,556,712	107,871,045	47,685,667
33618	Safety Ind Ins Co	159,817,342	168,272,900	153,082,212	71,792,934	81,289,278
33758	Associated Industries Of MA Mut Ins	83,358,387	101,712,384	732,876,927	414,056,723	318,820,203
34754	Commerce Ins Co	1,409,950,822	1,436,818,546	2,206,900,005	1,523,095,925	683,804,080
37346	Danbury Ins Co	8,818,400	8,818,400	14,138,955	6,367,956	7,771,000
39454	Safety Ins Co	578,979,894	603,964,694	1,656,723,224	902,657,016	754,066,208
40274	Citation Ins Co	236,728,857	236,728,857	217,023,824	150,163,794	66,860,030
41360	Arbella Protection Ins Co	199,513,304	241,771,320	366,260,228	233,705,256	132,554,972
41955	Barnstable Cnty Ins Co	4,279,638	4,279,638	30,032,633	4,145,679	25,886,954
44326	Atlantic Charter Ins Co	32,214,423	39,587,855	176,028,054	104,124,897	71,903,157
	TOTAL	\$5,006,517,878	\$8,525,379,562	\$78,686,299,345	\$49,727,640,770	\$28,958,658,573

Life Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2020	Total Premium Written 2020	Assets as of 12/31/2020	Liabilities as of 12/31/2020	Surplus as of 12/31/2020
61476	Boston Mut Life Ins Co	\$39,271,350	\$171,023,644	\$1,582,422,889	\$1,326,232,506	\$256,190,383
65935	Massachusetts Mut Life Ins Co	254,821,421	9,220,687,401	300,458,993,767	276,131,580,432	24,327,413,335
66265	Monarch Life Ins Co	29,771	790,316	620,254,509	616,886,368	3,368,139
67598	Paul Revere Life Ins Co	392,352	14,088,486	1,280,337,759	926,673,815	353,663,944
69140	First Allmerica Fin Life Ins Co	571,070	53,800,792	3,062,283,599	2,946,725,348	115,558,251
70435	The Savings Bank Mut Life Ins Co of	147,240,605	343,665,646	3,486,756,297	3,299,731,657	187,024,640
71714	Berkshire Life Ins Co of Amer	596,663	9,346,378	4,410,783,838	4,197,795,591	212,988,247
74920	Regal Reins Co	-	-	5,689,476	88,692	5,600,785
80896	Centre Life Ins Co	-	-	1,521,640,955	1,436,649,335	84,991,620
84824	Commonwealth Ann & Life Ins Co	2,351,800	44,534,235	42,763,755,378	39,397,302,686	3,366,452,692
91626	New England Life Ins Co	11,685,818	156,373,839	9,649,477,697	9,498,917,080	150,560,617
93610	John Hancock Life & Hlth Ins Co	13,963	351,310	19,136,740,304	17,852,673,212	1,284,067,092
	TOTAL	\$456,974,813	\$10,014,662,047	\$387,979,136,468	\$357,631,256,722	\$30,347,879,745

Health Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2020	Total Premium Written 2020	Assets as of 12/31/2020	Liabilities as of 12/31/2020	Surplus as of 12/31/2020
11109	Allways Hlth Partners Inc	\$859,113,733	\$859,113,733	\$286,402,099	\$130,483,727	\$155,918,372
12210	Dentegra Ins Co of New England	2,979,066	2,979,820	6,603,058	420,389	6,182,669
12219	BCBS of MA HMO Blue Inc	5,182,624,696	5,182,624,696	2,876,856,774	980,123,113	1,896,733,661
13203	Boston Medical Center Hlth Plan Inc	2,267,339,847	2,754,800,837	741,102,625	313,233,949	427,868,676
14131	Tufts Hlth Public Plans Inc	2,394,440,076	2,456,614,890	879,249,408	541,001,822	338,247,586
14198	HNE Ins Co	-	2,957,476	5,527,119	607,382	4,919,737
15497	DSM MA Ins Co Inc	23,097,586	23,097,586	10,979,750	1,800,760	9,178,992
16703	Always Hlth Partners Select LLC	-	-	1,106,902	-	1,106,902
18975	HPHC Ins Co Inc	357,814,420	670,765,721	287,685,413	151,428,411	136,257,002
52060	Dental Serv of MA Inc	211,524,207	211,524,207	126,861,337	85,960,442	40,900,895
53228	BCBS of MA	3,151,465,209	3,151,465,209	2,520,622,376	1,683,143,788	837,478,588
60117	Tufts Ins Co Inc	294,500,606	320,020,018	136,337,588	66,660,418	69,677,169
66828	Fallon Hlth & Life Assur Co	22,370,704	22,370,704	24,376,107	14,180,991	10,195,116
95299	Connecticare Of MA Inc	2,872,874	2,872,874	4,645,626	671,974	3,973,652
95541	Fallon Comm Hlth Plan Inc	1,630,022,479	1,630,022,479	581,147,077	348,879,380	232,267,697
95673	Health New England Inc	768,847,761	775,637,880	254,172,988	143,653,780	110,519,208
95688	Tufts Associated Hlth Maintenance Or	2,766,390,759	2,802,177,445	1,595,190,087	856,319,766	738,870,321
96717	Harvard Pilgrim Health Care New Eng	7,160,782	544,155,438	163,175,488	106,794,803	56,380,685
96911	Harvard Pilgrim Hlth Care Inc	1,272,484,352	1,753,232,624	1,187,274,125	460,398,090	726,876,035
	TOTAL	\$21,215,049,157	\$23,166,433,637	\$11,689,315,947	\$5,885,762,985	\$5,803,552,963

Fraternal Organizations

NAIC #	Company Name	Total Premium Written in MA 2020	Total Premium Written 2020	Assets as of 12/31/2020	Liabilities as of 12/31/2020	Surplus as of 12/31/2020
58130	Catholic Assn Of Foresters	\$90,166	\$106,511	\$10,198,633	\$6,973,162	\$3,225,471
58181	Supreme Council The Royal Arcanum	1,921,574	5,030,195	108,020,450	96,764,666	11,255,784
	TOTAL	\$2,011,740	\$5,136,706	\$118,219,083	\$103,737,828	\$14,481,255

Workers' Compensation Self-Insured Groups

Company Name	Gross Premium Written 2020	Net Premium Written in 2020	Total Net Assets as of 12/31/2020	Total Liabilities as of 12/31/2020	Total Surplus as of 12/31/2020
ABC Massachusetts Workers Compensation Self-Insurance Group, Inc.	\$3,482,114	\$2,805,504	\$6,514,259	\$6,514,259	\$0
Automotive Industries Compensation Corp.	7,822,948	7,165,326	9,424,059	9,424,059	0
Commonwealth Transportation Compensation Corporation (runoff since 1/31/2016)	0	0	71,716	71,716	0
Independent Schools Compensation Corporation	10,037,352	9,639,534	26,007,866	26,007,866	0
Manufacturers of Massachusetts Compensation Group (runoff since 1/1/2012)	0	0	1,233,834	1,238,323	(4,489)
Massachusetts Bay Self-Insurance Group, Inc.	2,590,549	2,275,332	7,220,379	5,312,675	1,907,704
Massachusetts Care Self-Insurance Group, Inc.	7,209,991	6,781,026	7,682,116	7,682,116	0
Massachusetts Catholic Self-Insurance Group, Inc. Y/E- 3/31/2020	3,706,247	3,417,509	15,277,680	6,607,554	8,670,126
Assn. P-C Group (MEGA) Y/E- 6/30/2020	16,669,694	15,934,677	33,336,728	22,807,549	10,529,179
Massachusetts Healthcare Self-Insurance	6,532,482	5,788,882	7,521,981	7,521,981	0

Group, Inc.					
Massachusetts High Technology Self-Insurance Group (runoff 1/1/2020)	46,484	44,735	1,175,070	1,175,070	0
Massachusetts Manufacturing Self-Insurance Group, Inc.	4,029,257	3,682,045	7,022,865	6,922,865	100,000
Massachusetts McDonald's Operators Workers' Compensation Group, Inc.	1,945,380	1,784,176	3,937,157	3,937,157	0
Massachusetts NAHRO Insurance Group, Inc.	5,282,935	4,466,773	11,155,586	9,860,973	1,294,612
Massachusetts Retail Merchants Workers' Comp. Self-Insurance Group, Inc.	21,822,175	20,052,168	35,004,407	35,004,407	0
Massachusetts Trade Self-Insurance Group, Inc.	8,217,678	7,328,206	9,051,627	9,051,627	0
MIIA Property-Casualty Group, Inc. Y/E-6/30/2020	91,333,886	67,287,057	304,808,884	171,081,500	133,727,384
NEEIA Compensation, Inc.	8,082,595	7,712,458	25,597,752	25,597,752	0
Self- Insured Lumber Businesses Assn, Inc.	4,349,248	3,921,888	6,862,687	6,820,720	41,967
(STAM) School Transportation Assn. of MA	4,473,052	3,964,787	6,426,292	6,426,292	0
Self-Insurance Group, Inc.					
TOTAL		\$207,634,067	\$174,052,083	\$525,332,945	\$369,066,461

Appendix C: Direct Premium Written 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	1,462,381,525	35.18%
60054	AETNA LIFE INS CO	CT	433,023,520	10.42%
67369	CIGNA HLTH & LIFE INS CO	CT	373,088,436	8.98%
65978	METROPOLITAN LIFE INS CO	NY	221,276,050	5.32%
62235	UNUM LIFE INS CO OF AMER	ME	172,276,390	4.14%
80802	US BR SUN LIFE ASSUR CO OF CANADA	MI	103,404,408	2.49%
64246	GUARDIAN LIFE INS CO OF AMER	NY	97,751,047	2.35%
65315	LINCOLN LIFE ASSUR CO OF BOSTON	NH	75,123,360	1.81%
70025	GENWORTH LIFE INS CO	DE	69,158,645	1.66%
70815	HARTFORD LIFE & ACCIDENT INS CO	CT	63,905,874	1.54%
60380	AMERICAN FAMILY LIFE ASSUR CO OF COL	NE	56,649,945	1.36%
65498	LIFE INS CO OF N AMER	PA	56,411,365	1.36%
65838	JOHN HANCOCK LIFE INS CO USA	MI	54,579,796	1.31%
68241	PRUDENTIAL INS CO OF AMER	NJ	51,361,115	1.24%
62049	COLONIAL LIFE & ACCIDENT INS CO	SC	48,856,947	1.18%
68381	RELIANCE STANDARD LIFE INS CO	IL	43,093,254	1.04%
61271	PRINCIPAL LIFE INS CO	IA	41,512,326	1.00%
69019	STANDARD INS CO	OR	39,159,836	0.94%
71870	FIDELITY SECURITY LIFE INS CO	MO	36,086,989	0.87%
67091	NORTHWESTERN MUT LIFE INS CO	WI	34,890,458	0.84%

Total Companies Writing in MA	222
Top 20 Companies	\$ 3,533,991,286
Direct Written Premium	85.0%
Remaining Companies	\$ 622,688,791
Direct Written Premium	15.0%
Total Direct Written Premium	\$ 4,156,680,077

Aircraft (All Perils)

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
37885	XL SPECIALTY INS CO	DE	6,239,568	19.57%

19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	5,501,563	17.25%
38318	STARR IND & LIAB CO	TX	3,891,012	12.20%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	3,182,239	9.98%
20052	NATIONAL LIAB & FIRE INS CO	CT	1,815,529	5.69%
22667	ACE AMER INS CO	PA	1,815,515	5.69%
10641	ENDURANCE AMER INS CO	DE	1,677,293	5.26%
24147	OLD REPUBLIC INS CO	PA	1,635,196	5.13%
19720	AMERICAN ALT INS CORP	DE	1,268,563	3.98%
16691	GREAT AMER INS CO	OH	830,307	2.60%
39217	QBE INS CORP	PA	581,482	1.82%
10945	TOKIO MARINE AMER INS CO	NY	572,576	1.80%
34274	CENTRAL STATES IND CO OF OMAHA	NE	555,614	1.74%
10367	AVEMCO INS CO	MD	336,443	1.06%
25496	STARSTONE NATL INS CO	DE	281,627	0.88%
19941	AMERICAN COMMERCE INS CO	OH	280,875	0.88%
26433	HARCO NATL INS CO	IL	252,263	0.79%
13604	STARR SURPLUS LINES INS CO	TX	244,213	0.77%
29599	US SPECIALTY INS CO	TX	231,874	0.73%
34037	HALLMARK INS CO	AZ	220,394	0.69%

Total Companies Writing in MA	27
Top 20 Companies	\$31,414,146
Direct Written Premium	98.5%
Remaining Companies	\$470,552
Direct Written Premium	1.5%
Total Direct Written Premium	\$ 31,884,698

Annuities

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	784,146,073	9.65%
91596	NEW YORK LIFE INS & ANN CORP	DE	572,876,733	7.05%
65056	JACKSON NATL LIFE INS CO	MI	547,659,361	6.74%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	545,015,533	6.71%
86509	VOYA RETIREMENT INS & ANN CO	CT	432,428,878	5.32%
65676	LINCOLN NATL LIFE INS CO	IN	402,825,254	4.96%
61689	ATHENE ANN & LIFE CO	IA	358,471,151	4.41%
62944	EQUITABLE FINANCIAL LIFE INS CO	NY	317,888,645	3.91%
60488	AMERICAN GEN LIFE INS CO	TX	277,666,195	3.42%
66869	NATIONWIDE LIFE INS CO	OH	246,294,155	3.03%
68675	SECURITY BENEFIT LIFE INS CO	KS	226,977,672	2.79%
66044	MIDLAND NATL LIFE INS CO	IA	187,993,816	2.31%
90611	ALLIANZ LIFE INS CO OF N AMER	MN	187,177,757	2.30%
87726	BRIGHTHOUSE LIFE INS CO	DE	171,279,233	2.11%
65005	RIVERSOURCE LIFE INS CO	MN	165,311,381	2.03%
68322	GREAT W LIFE & ANN INS CO	CO	163,078,501	2.01%
92622	WESTERN SOUTHERN LIFE ASSUR CO	OH	145,501,211	1.79%
92657	NATIONWIDE LIFE & ANN INS CO	OH	137,609,505	1.69%
91642	FORETHOUGHT LIFE INS CO	IN	132,604,124	1.63%
67466	PACIFIC LIFE INS CO	NE	121,549,762	1.50%

Total Companies Writing in MA	177
Top 20 Companies	\$6,124,354,940
Direct Written Premium	75.3%
Remaining Companies	\$2,003,573,700
Direct Written Premium	24.7%
Total Direct Written Premium	\$8,127,928,640

Boiler & Machinery

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
21482	FACTORY MUT INS CO	RI	12,310,699	31.87%
20281	FEDERAL INS CO	IN	3,261,791	8.44%

25674	TRAVELERS PROP CAS CO OF AMER	CT	2,004,720	5.19%
10014	AFFILIATED FM INS CO	RI	1,672,614	4.33%
20443	CONTINENTAL CAS CO	IL	1,463,151	3.79%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	1,345,962	3.48%
16535	ZURICH AMER INS CO	NY	1,284,878	3.33%
25658	TRAVELERS IND CO	CT	877,668	2.27%
24554	XL INS AMER INC	DE	839,207	2.17%
43001	NARRAGANSETT BAY INS CO	RI	825,269	2.14%
11452	HARTFORD STEAM BOIL INSPEC & INS CO	CT	800,769	2.07%
20303	GREAT NORTHERN INS CO	IN	791,992	2.05%
26247	AMERICAN GUAR & LIAB INS	NY	692,380	1.79%
29700	NORTH AMER ELITE INS CO	NH	647,412	1.68%
39845	WESTPORT INS CORP	MO	618,542	1.60%
19259	SELECTIVE INS CO OF SC	IN	615,897	1.59%
31325	ACADIA INS CO	IA	477,557	1.24%
21458	EMPLOYERS INS CO OF WAUSAU	WI	469,607	1.22%
23035	LIBERTY MUT FIRE INS CO	WI	460,198	1.19%
25844	UNION INS CO	IA	448,537	1.16%

Total Companies Writing in MA	116
Top 20 Companies	\$31,908,850
Direct Written Premium	82.6%
Remaining Companies	\$6,724,372
Direct Written Premium	17.4%
Total Direct Written Premium	\$38,633,222

Burglary & Theft

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	3,636,318	35.91%
20281	FEDERAL INS CO	IN	1,219,260	12.04%
10200	HISCOX INS CO INC	IL	845,398	8.35%
37885	XL SPECIALTY INS CO	DE	746,716	7.37%
20443	CONTINENTAL CAS CO	IL	580,654	5.73%
16535	ZURICH AMER INS CO	NY	542,056	5.35%
22292	HANOVER INS CO	NH	436,408	4.31%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	299,855	2.96%
29599	US SPECIALTY INS CO	TX	281,520	2.78%
32603	BERKLEY INS CO	DE	157,737	1.56%
10120	EVEREST NATL INS CO	DE	156,853	1.55%
29459	TWIN CITY FIRE INS CO CO	IN	145,474	1.44%
29700	NORTH AMER ELITE INS CO	NH	119,079	1.18%
18058	PHILADELPHIA IND INS CO	PA	86,069	0.85%
19682	HARTFORD FIRE INS CO	CT	64,653	0.64%
42307	NAVIGATORS INS CO	NY	63,730	0.63%
20346	PACIFIC IND CO	WI	61,776	0.61%
27154	ATLANTIC SPECIALTY INS CO	NY	50,688	0.50%
22667	ACE AMER INS CO	PA	43,938	0.43%
10677	THE CINCINNATI INS CO	OH	40,792	0.40%

Total Companies Writing in MA	105
Top 20 Companies	\$9,578,974
Direct Written Premium	94.6%
Remaining Companies	\$548,067
Direct Written Premium	5.4%
Total Direct Written Premium	\$10,127,041

Commercial Auto

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	129,254,193	13.51%
41360	ARBELLA PROTECTION INS CO	MA	91,466,173	9.56%
39454	SAFETY INS CO	MA	66,141,697	6.91%

21750	PILGRIM INS CO	MA	45,782,274	4.78%
33618	SAFETY IND INS CO	MA	41,776,363	4.37%
18058	PHILADELPHIA IND INS CO	PA	35,694,964	3.73%
24260	PROGRESSIVE CAS INS CO	OH	29,546,573	3.09%
16535	ZURICH AMER INS CO	NY	21,851,760	2.28%
41840	ALLMERICA FIN BENEFIT INS CO	MI	21,827,268	2.28%
19046	TRAVELERS CAS INS CO OF AMER	CT	20,885,761	2.18%
31325	ACADIA INS CO	IA	16,976,665	1.77%
14788	NGM INS CO	FL	14,500,385	1.52%
23035	LIBERTY MUT FIRE INS CO	WI	13,839,199	1.45%
24082	OHIO SECURITY INS CO	NH	13,752,105	1.44%
24147	OLD REPUBLIC INS CO	PA	13,283,317	1.39%
25615	CHARTER OAK FIRE INS CO	CT	12,883,591	1.35%
25658	TRAVELERS IND CO	CT	12,710,424	1.33%
11770	UNITED FINANCIAL CAS CO	OH	12,157,542	1.27%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	11,932,820	1.25%
40274	CITATION INS CO	MA	11,451,448	1.20%

Total Companies Writing in MA	201
Top 20 Companies	\$637,714,522
Direct Written Premium	66.6%
Remaining Companies	\$319,196,398
Direct Written Premium	33.4%
Total Direct Written Premium	\$956,910,920

Commercial Multi-Peril

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
41360	ARBELLA PROTECTION INS CO	MA	82,143,230	6.19%
18058	PHILADELPHIA IND INS CO	PA	82,075,826	6.18%
25992	NORTHERN SECURITY INS CO INC	VT	81,302,667	6.13%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	64,326,217	4.85%
20281	FEDERAL INS CO	IN	46,087,538	3.47%
24082	OHIO SECURITY INS CO	NH	36,228,438	2.73%
31534	CITIZENS INS CO OF AMER	MI	35,259,236	2.66%
25623	PHOENIX INS CO	CT	28,615,821	2.16%
15067	QUINCY MUT FIRE INS CO	MA	27,031,139	2.04%
19046	TRAVELERS CAS INS CO OF AMER	CT	26,255,647	1.98%
25674	TRAVELERS PROP CAS CO OF AMER	CT	24,928,675	1.88%
29939	MAIN ST AMER ASSUR CO	FL	24,823,324	1.87%
22292	HANOVER INS CO	NH	24,197,690	1.82%
26018	VERMONT MUT INS CO	VT	22,621,684	1.70%
22306	MASSACHUSETTS BAY INS CO	NH	21,881,272	1.65%
25666	TRAVELERS IND CO OF AMER	CT	21,225,445	1.60%
23876	MAPFRE INS CO	NJ	20,525,855	1.55%
19801	ARGONAUT INS CO	IL	20,395,086	1.54%
29459	TWIN CITY FIRE INS CO CO	IN	19,496,003	1.47%
25615	CHARTER OAK FIRE INS CO	CT	19,125,910	1.44%

Total Companies Writing in MA	221
Top 20 Companies	\$728,546,703
Direct Written Premium	54.9%
Remaining Companies	\$598,610,719
Direct Written Premium	45.1%
Total Direct Written Premium	\$1,327,157,422

Credit

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
27154	ATLANTIC SPECIALTY INS CO	NY	7,803,664	19.56%
16691	GREAT AMER INS CO	OH	6,454,414	16.18%
20516	EULER HERMES N AMER INS CO	MD	5,318,115	13.33%
26565	OHIO IND CO	OH	3,792,776	9.51%

26344	GREAT AMER ASSUR CO	OH	3,527,263	8.84%
31887	COFACE N AMER INS CO	MA	2,508,523	6.29%
11150	ARCH INS CO	MO	2,004,616	5.02%
25422	ATRADIUS TRADE CREDIT INS CO	MD	1,943,854	4.87%
25011	WESCO INS CO	DE	1,268,244	3.18%
29980	FIRST COLONIAL INS CO	FL	1,179,207	2.96%
19429	INSURANCE CO OF THE STATE OF PA	IL	1,118,471	2.80%
39217	QBE INS CORP	PA	945,345	2.37%
10051	LYNDON SOUTHERN INS CO	DE	686,879	1.72%
29599	US SPECIALTY INS CO	TX	537,786	1.35%
23043	LIBERTY MUT INS CO	MA	186,233	0.47%
16535	ZURICH AMER INS CO	NY	155,000	0.39%
10847	CUMIS INS SOCIETY INC	IA	104,835	0.26%
16624	ALLIED WORLD SPECIALTY INS CO	DE	90,000	0.23%
10111	AMERICAN BANKERS INS CO OF FL	FL	83,536	0.21%
20699	ACE PROP & CAS INS CO	PA	75,557	0.19%

Total Companies Writing in MA	28
Top 20 Companies	\$39,784,318
Direct Written Premium	99.7%
Remaining Companies	\$113,303
Direct Written Premium	0.3%
Total Direct Written Premium	\$39,897,621

Deposit Funds

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	MASSACHUSETTS MUT LIFE INS CO	MA	1,114,792,229	49.06%
86509	VOYA RETIREMENT INS & ANN CO	CT	537,439,282	23.65%
61271	PRINCIPAL LIFE INS CO	IA	144,566,003	6.36%
93629	PRUDENTIAL RETIREMENT INS & ANN CO	CT	109,552,217	4.82%
84824	COMMONWEALTH ANN & LIFE INS CO	MA	75,022,352	3.30%
70238	VARIABLE ANN LIFE INS CO	TX	51,775,254	2.28%
69019	STANDARD INS CO	OR	27,267,359	1.20%
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	21,585,560	0.95%
69868	UNITED OF OMAHA LIFE INS CO	NE	17,664,033	0.78%
68322	GREAT W LIFE & ANN INS CO	CO	16,826,287	0.74%
61115	ATLANTIC COAST LIFE INS CO	SC	16,353,144	0.72%
88072	TALCOTT RESOLUTION LIFE INS CO	CT	15,099,364	0.66%
91596	NEW YORK LIFE INS & ANN CORP	DE	13,998,409	0.62%
58033	KNIGHTS OF COLUMBUS	CT	12,883,708	0.57%
66583	NATIONAL GUARDIAN LIFE INS CO	WI	12,693,781	0.56%
68136	PROTECTIVE LIFE INS CO	TN	10,127,734	0.45%
66168	MINNESOTA LIFE INS CO	MN	9,750,159	0.43%
92622	WESTERN SOUTHERN LIFE ASSUR CO	OH	9,548,575	0.42%
68241	PRUDENTIAL INS CO OF AMER	NJ	6,876,324	0.30%
74780	INTEGRITY LIFE INS CO	OH	5,566,184	0.24%

Total Companies Writing in MA	79
Top 20 Companies	\$2,229,387,958
Direct Written Premium	98.1%
Remaining Companies	\$42,749,511
Direct Written Premium	1.9%
Total Direct Written Premium	\$2,272,137,469

Fidelity & Surety

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	28,973,298	13.78%
23043	LIBERTY MUT INS CO	MA	27,056,150	12.87%
20281	FEDERAL INS CO	IN	22,630,797	10.76%
39306	FIDELITY & DEPOSIT CO OF MD	IL	17,176,668	8.17%
13188	WESTERN SURETY CO	SD	16,515,480	7.85%

16691	GREAT AMER INS CO	OH	5,723,115	2.72%
29874	NORTH AMER SPECIALTY INS CO	NH	4,798,987	2.28%
22292	HANOVER INS CO	NH	4,335,818	2.06%
18058	PHILADELPHIA IND INS CO	PA	4,148,544	1.97%
32603	BERKLEY INS CO	DE	3,842,820	1.83%
19682	HARTFORD FIRE INS CO	CT	3,703,059	1.76%
27154	ATLANTIC SPECIALTY INS CO	NY	3,565,352	1.70%
24074	OHIO CAS INS CO	NH	3,519,921	1.67%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	3,186,874	1.52%
14788	NGM INS CO	FL	3,080,468	1.46%
23787	NATIONWIDE MUT INS CO	OH	3,020,047	1.44%
11150	ARCH INS CO	MO	2,902,597	1.38%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	2,856,394	1.36%
26921	EVEREST REINS CO	DE	2,817,446	1.34%
36226	UNITED CAS & SURETY INS CO	NE	2,519,108	1.20%

Total Companies Writing in MA	168
Top 20 Companies	\$166,372,943
Direct Written Premium	79.1%
Remaining Companies	\$43,906,851
Direct Written Premium	20.9%
Total Direct Written Premium	\$210,279,794

Fire

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	22,537,049	8.26%
21482	FACTORY MUT INS CO	RI	19,103,455	7.00%
26018	VERMONT MUT INS CO	VT	15,418,198	5.65%
19798	MERRIMACK MUT FIRE INS CO	MA	14,913,381	5.47%
13604	STARR SURPLUS LINES INS CO	TX	13,044,552	4.78%
10014	AFFILIATED FM INS CO	RI	12,779,642	4.69%
16535	ZURICH AMER INS CO	NY	10,419,179	3.82%
25658	TRAVELERS IND CO	CT	10,145,246	3.72%
29700	NORTH AMER ELITE INS CO	NH	9,654,814	3.54%
42978	AMERICAN SECURITY INS CO	DE	7,828,343	2.87%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	6,506,885	2.39%
21458	EMPLOYERS INS CO OF WAUSAU	WI	6,371,416	2.34%
23035	LIBERTY MUT FIRE INS CO	WI	5,605,496	2.06%
17000	ARBELLA MUT INS CO	MA	5,511,081	2.02%
19429	INSURANCE CO OF THE STATE OF PA	IL	5,410,049	1.98%
11185	FOREMOST INS CO GRAND RAPIDS MI	MI	5,387,477	1.98%
24554	XL INS AMER INC	DE	5,097,649	1.87%
26522	MOUNT VERNON FIRE INS CO	PA	4,433,216	1.63%
39454	SAFETY INS CO	MA	4,415,941	1.62%
26298	METROPOLITAN PROP & CAS INS CO	RI	4,368,241	1.60%

Total Companies Writing in MA	193
Top 20 Companies	\$188,951,310
Direct Written Premium	69.3%
Remaining Companies	\$83,803,996
Direct Written Premium	30.7%
Total Direct Written Premium	\$272,755,306

Fraternals

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
58033	Knights Of Columbus	CT	47,545,942	56.41%
56014	Thrivent Financial For Lutherans	WI	16,028,087	19.02%
58068	Independent Order Of Foresters Us Br	NY	9,506,304	11.28%
58181	Supreme Council The Royal Arcanum	MA	2,239,781	2.66%
57541	Modern Woodmen Of Amer	IL	2,066,832	2.45%

56332	First Cath Slovak Ladies Assn USA	OH	1,782,606	2.11%
56685	GBU Financial Life	PA	764,755	0.91%
57770	Catholic Holy Family Society	IL	646,942	0.77%
57967	Luso Amer Life Ins Society	CA	628,203	0.75%
57622	Polish Natl Alliance Us Of Na	IL	504,794	0.60%
56030	Catholic Financial Life	WI	470,151	0.56%
56456	United States Letter Carriers Mut Be	TN	456,072	0.54%
57487	Catholic Order Of Foresters	IL	366,588	0.43%
56820	Polish Falcons Of Amer	PA	219,439	0.26%
57010	William Penn Assn	PA	159,242	0.19%
57320	Woodmen World Life Ins Soc	NE	158,814	0.19%
58009	Police & Firemens Ins Assn	IN	142,817	0.17%
57142	Sons Of Norway	MN	93,265	0.11%
58130	Catholic Assn Of Foresters	MA	90,284	0.11%
57630	Polish Roman Catholic Union Of Amer	IL	89,260	0.11%

Total Companies Writing in MA	40
Top 20 Companies	\$83,960,178
Direct Written Premium	99.6%
Remaining Companies	\$326,997
Direct Written Premium	0.4%
Total Direct Written Premium	\$84,287,175

Health

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
12219	BCBS OF MA HMO BLUE INC	MA	5,182,624,696	23.58%
53228	BCBS OF MA	MA	3,151,465,209	14.34%
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	MA	2,766,390,759	12.59%
14131	TUFTS HLTH PUBLIC PLANS INC	MA	2,394,473,674	10.89%
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	MA	2,267,339,847	10.32%
95541	FALLON COMM HLTH PLAN INC	MA	1,630,022,479	7.42%
96911	HARVARD PILGRIM HLTH CARE INC	MA	1,272,484,353	5.79%
11109	ALLWAYS HLTH PARTNERS INC	MA	859,113,733	3.91%
95673	HEALTH NEW ENGLAND INC	MA	775,637,880	3.53%
18975	HPHC INS CO INC	MA	357,814,420	1.63%
60117	TUFTS INS CO INC	MA	294,500,606	1.34%
52060	DENTAL SERV OF MA INC	MA	211,524,207	0.96%
95149	UNITEDHEALTHCARE OF NEW ENGLAND INC	RI	191,458,574	0.87%
60318	UNITED HLTHCARE INS CO OF IL	IL	143,900,887	0.65%
12575	SILVERSCRIPT INS CO	TN	101,988,823	0.46%
73288	HUMANA INS CO	WI	73,177,021	0.33%
10155	WELLCARE PRESCRIPTION INS INC	AZ	71,431,708	0.32%
52632	ALTUS DENTAL INS CO INC	RI	69,115,205	0.31%
39616	VISION SERV PLAN INS CO	OH	41,654,645	0.19%
15497	DSM MA INS CO INC	MA	23,097,586	0.11%

Total Companies Writing in MA	34
Top 20 Companies	\$21,879,216,312
Direct Written Premium	99.5%
Remaining Companies	\$100,105,665
Direct Written Premium	0.5%
Total Direct Written Premium	\$21,979,321,977

Homeowner's Multi-Peril

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
40274	CITATION INS CO	MA	212,423,705	8.01%
17000	ARBELLA MUT INS CO	MA	128,248,906	4.83%
34754	COMMERCE INS CO	MA	123,922,478	4.67%

19976	AMICA MUT INS CO	RI	109,920,995	4.14%
33618	SAFETY IND INS CO	MA	108,840,540	4.10%
19798	MERRIMACK MUT FIRE INS CO	MA	94,125,558	3.55%
26018	VERMONT MUT INS CO	VT	91,611,582	3.45%
36447	LM GEN INS CO	IL	73,474,109	2.77%
23035	LIBERTY MUT FIRE INS CO	WI	70,278,114	2.65%
43001	NARRAGANSETT BAY INS CO	RI	64,855,885	2.44%
19763	BAY STATE INS CO	MA	56,518,470	2.13%
39454	SAFETY INS CO	MA	53,802,229	2.03%
26298	METROPOLITAN PROP & CAS INS CO	RI	53,023,713	2.00%
23043	LIBERTY MUT INS CO	MA	52,929,857	2.00%
15067	QUINCY MUT FIRE INS CO	MA	49,423,425	1.86%
10969	UNITED PROP & CAS INS CO	FL	48,856,831	1.84%
31534	CITIZENS INS CO OF AMER	MI	48,734,877	1.84%
25941	UNITED SERV AUTOMOBILE ASSN	TX	45,792,729	1.73%
12873	PRIVILEGE UNDERWRITERS RECP EXCH	FL	45,146,220	1.70%
20346	PACIFIC IND CO	WI	43,272,492	1.63%

Total Companies Writing in MA	172
Top 20 Companies	\$1,575,202,715
Direct Written Premium	59.4%
Remaining Companies	\$1,077,559,748
Direct Written Premium	40.6%
Total Direct Written Premium	\$2,652,762,463

Liability Other Than Auto

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	148,921,486	7.44%
20281	FEDERAL INS CO	IN	143,398,643	7.17%
37885	XL SPECIALTY INS CO	DE	114,187,293	5.71%
20443	CONTINENTAL CAS CO	IL	85,999,366	4.30%
22667	ACE AMER INS CO	PA	67,003,706	3.35%
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	51,943,350	2.60%
25674	TRAVELERS PROP CAS CO OF AMER	CT	50,358,382	2.52%
10641	ENDURANCE AMER INS CO	DE	42,573,394	2.13%
16535	ZURICH AMER INS CO	NY	40,235,328	2.01%
11150	ARCH INS CO	MO	39,028,255	1.95%
18058	PHILADELPHIA IND INS CO	PA	36,077,542	1.80%
10120	EVEREST NATL INS CO	DE	30,857,053	1.54%
25054	HUDSON INS CO	DE	30,508,996	1.52%
22292	HANOVER INS CO	NH	30,407,655	1.52%
37273	AXIS INS CO	IL	28,966,697	1.45%
37540	BEAZLEY INS CO INC	CT	28,414,609	1.42%
29599	US SPECIALTY INS CO	TX	28,037,811	1.40%
38318	STARR IND & LIAB CO	TX	26,364,112	1.32%
24147	OLD REPUBLIC INS CO	PA	25,192,601	1.26%
10690	ALLIED WORLD NATL ASSUR CO	NH	24,705,415	1.23%

Total Companies Writing in MA	361
Top 20 Companies	\$1,073,181,694
Direct Written Premium	53.6%
Remaining Companies	\$928,127,736
Direct Written Premium	46.4%
Total Direct Written Premium	\$2,001,309,430

Life

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
67091	Northwestern Mut Life Ins Co	WI	308,625,875	7.86%
66915	New York Life Ins Co	NY	262,835,366	6.69%
65935	Massachusetts Mut Life Ins Co	MA	254,821,421	6.49%
65978	Metropolitan Life Ins Co	NY	233,001,214	5.93%

65676	Lincoln Natl Life Ins Co	IN	176,002,276	4.48%
64246	Guardian Life Ins Co Of Amer	NY	165,846,581	4.22%
65838	John Hancock Life Ins Co USA	MI	163,284,235	4.16%
79227	Pruco Life Ins Co	AZ	153,059,198	3.90%
70435	The Savings Bank Mut Life Ins Co of	MA	147,240,605	3.75%
68241	Prudential Ins Co Of Amer	NJ	114,037,934	2.90%
70815	Hartford Life & Accident Ins Co	CT	90,023,594	2.29%
87726	Brighthouse Life Ins Co	DE	87,646,664	2.23%
86231	Transamerica Life Ins Co	IA	86,721,498	2.21%
91596	New York Life Ins & Ann Corp	DE	67,078,921	1.71%
60488	American Gen Life Ins Co	TX	58,369,191	1.49%
69868	United Of Omaha Life Ins Co	NE	53,647,082	1.37%
62235	Unum Life Ins Co Of Amer	ME	53,408,224	1.36%
65315	Lincoln Life Assur Co of Boston	NH	51,560,578	1.31%
66168	Minnesota Life Ins Co	MN	50,290,394	1.28%
67466	Pacific Life Ins Co	NE	48,664,473	1.24%

Total Companies Writing in MA	306
Top 20 Companies	\$2,626,165,324
Direct Written Premium	66.9%
Remaining Companies	\$1,300,146,973
Direct Written Premium	33.1%
Total Direct Written Premium	\$3,926,312,297

Life All Lines

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	Massachusetts Mut Life Ins Co	MA	3,054,477,538	17.26%
86509	Voya Retirement Ins & Ann Co	CT	1,089,292,020	6.15%
69345	Teachers Ins & Ann Assoc Of Amer	NY	817,150,540	4.62%
65978	Metropolitan Life Ins Co	NY	792,897,902	4.48%
66915	New York Life Ins Co	NY	717,449,741	4.05%
65838	John Hancock Life Ins Co USA	MI	706,993,390	3.99%
91596	New York Life Ins & Ann Corp	DE	653,954,063	3.69%
65676	Lincoln Natl Life Ins Co	IN	578,827,530	3.27%
65056	Jackson Natl Life Ins Co	MI	561,110,583	3.17%
67091	Northwestern Mut Life Ins Co	WI	363,872,705	2.06%
61689	Athene Ann & Life Co	IA	359,594,551	2.03%
62944	Equitable Financial Life Ins Co	NY	346,235,951	1.96%
86231	Transamerica Life Ins Co	IA	343,383,678	1.94%
60488	American Gen Life Ins Co	TX	340,220,193	1.92%
87726	Brighthouse Life Ins Co	DE	258,925,952	1.46%
66869	Nationwide Life Ins Co	OH	257,755,486	1.46%
61271	Principal Life Ins Co	IA	241,285,789	1.36%
79227	Pruco Life Ins Co	AZ	227,898,345	1.29%
68675	Security Benefit Life Ins Co	KS	227,485,451	1.29%
68241	Prudential Ins Co Of Amer	NJ	226,929,085	1.28%

Total Companies Writing in MA	313
Top 20 Companies	\$12,165,740,493
Direct Written Premium	68.7%
Remaining Companies	\$5,534,929,545
Direct Written Premium	31.3%
Total Direct Written Premium	\$17,700,670,038

Life / Other Funds

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	Massachusetts Mut Life Ins Co	MA	1,139,848,355	33.77%
65838	John Hancock Life Ins Co USA	MI	542,746,259	16.08%
65978	Metropolitan Life Ins Co	NY	530,182,520	15.71%
66915	New York Life Ins Co	NY	427,520,547	12.67%

86231	Transamerica Life Ins Co	IA	179,956,981	5.33%
86509	Voya Retirement Ins & Ann Co	CT	117,877,749	3.49%
70688	Transamerica Financial Life Ins Co	NY	75,902,786	2.25%
69019	Standard Ins Co	OR	75,615,988	2.24%
93629	Prudential Retirement Ins & Ann Co	CT	67,888,318	2.01%
68241	Prudential Ins Co Of Amer	NJ	65,351,013	1.94%
62626	CMFG Life Ins Co	IA	47,215,271	1.40%
88668	Mutual Of Amer Life Ins Co	NY	46,191,187	1.37%
66168	Minnesota Life Ins Co	MN	34,256,178	1.01%
88072	Talcott Resolution Life Ins Co	CT	19,728,034	0.58%
62944	Equitable Financial Life Ins Co	NY	3,473,770	0.10%
71153	Talcott Resolution Life & Ann Ins Co	CT	662,564	0.02%
67172	Ohio Natl Life Ins Co	OH	607,911	0.02%
78778	Guardian Ins & Ann Co Inc	DE	295,388	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	62,817,298	56.18%
11843	MEDICAL PROTECTIVE CO	IN	13,390,229	11.97%
20427	AMERICAN CAS CO OF READING PA	PA	8,281,663	7.41%
15890	INTEGRIS INS CO	CT	5,752,313	5.14%
34495	DOCTORS CO AN INTERINS EXCH	CA	5,188,933	4.64%
10638	PROSELECT INS CO	NE	2,917,915	2.61%
42617	MAG MUT INS CO	GA	2,071,962	1.85%
19917	LIBERTY INS UNDERWRITERS INC	IL	1,807,942	1.62%
36277	MEDICAL MUT INS CO OF ME	ME	1,750,006	1.57%
22667	ACE AMER INS CO	PA	1,686,320	1.51%
14460	PROASSURANCE INS CO OF AMER	IL	1,554,399	1.39%
15865	NCMIC INS CO	IA	1,249,018	1.12%
35157	FAIR AMER INS & REINS CO	NY	861,842	0.77%
22730	ALLIED WORLD INS CO	NH	404,811	0.36%
18767	CHURCH MUT INS CO S I	WI	372,266	0.33%
10801	FORTRESS INS CO	IL	277,111	0.25%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	273,988	0.25%
13714	PHARMACISTS MUT INS CO	IA	263,435	0.24%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	181,554	0.16%
43460	ASPEN AMER INS CO	TX	175,241	0.16%

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	29,169,122	22.48%
29858	MORTGAGE GUAR INS CORP	WI	22,075,759	17.01%
38458	GENWORTH MORTGAGE INS CORP	NC	18,527,457	14.28%
33790	RADIAN GUAR INC	PA	17,444,997	13.44%
13634	ESSENT GUAR INC	PA	13,709,080	10.57%
13695	NATIONAL MORTGAGE INS CORP	WI	12,308,379	9.49%
15873	UNITED GUAR RESIDENTIAL INS CO	NC	7,265,861	5.60%

18287	ASSURED GUAR MUNICIPAL CORP	NY	6,493,701	5.00%
28452	REPUBLIC MORTGAGE INS CO	NC	1,100,332	0.85%
18708	AMBAC ASSUR CORP	WI	779,327	0.60%
18732	ARCH MORTGAGE GUAR CO	WI	612,959	0.47%
14380	BUILD AMER MUT ASSUR CO	NY	159,540	0.12%
16675	GENWORTH MORTGAGE INS CORP OF NC	NC	43,583	0.03%
18740	MGIC IND CORP	WI	29,087	0.02%
12041	MBIA INS CORP	NY	16,733	0.01%
30180	ASSURED GUAR CORP	MD	13,705	0.01%
29114	ARCH MORTGAGE ASSUR CO	WI	3,627	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	1,122,673,752	20.72%
22063	GOVERNMENT EMPLOYEES INS CO	NE	554,870,007	10.24%
39454	SAFETY INS CO	MA	422,514,910	7.80%
17000	ARBELLA MUT INS CO	MA	399,404,962	7.37%
14737	PLYMOUTH ROCK ASSUR CORP	MA	356,765,393	6.58%
16322	PROGRESSIVE DIRECT INS CO	OH	247,166,745	4.56%
35882	GEICO GEN INS CO	NE	237,435,361	4.38%
36447	LM GEN INS CO	IL	221,611,688	4.09%
23043	LIBERTY MUT INS CO	MA	219,692,956	4.05%
19070	STANDARD FIRE INS CO	CT	193,139,612	3.56%
26298	METROPOLITAN PROP & CAS INS CO	RI	172,735,341	3.19%

19976	AMICA MUT INS CO	RI	145,492,367	2.68%
31534	CITIZENS INS CO OF AMER	MI	107,094,345	1.98%
19232	ALLSTATE INS CO	IL	91,819,194	1.69%
24260	PROGRESSIVE CAS INS CO	OH	86,610,540	1.60%
15067	QUINCY MUT FIRE INS CO	MA	79,785,442	1.47%
12484	LIBERTY MUT PERSONAL INS CO	NH	76,210,434	1.41%
25968	USAA CAS INS CO	TX	64,462,811	1.19%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	58,914,323	1.09%
22292	HANOVER INS CO	NH	53,571,154	0.99%

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	1,409,950,822	9.03%
39454	SAFETY INS CO	MA	578,979,894	3.71%
22063	GOVERNMENT EMPLOYEES INS CO	NE	561,183,023	3.59%
17000	ARBELLA MUT INS CO	MA	545,211,947	3.49%
14737	PLYMOUTH ROCK ASSUR CORP	MA	361,157,919	2.31%
23043	LIBERTY MUT INS CO	MA	324,728,061	2.08%
36447	LM GEN INS CO	IL	296,559,086	1.90%
20281	FEDERAL INS CO	IN	282,915,058	1.81%
19976	AMICA MUT INS CO	RI	269,912,523	1.73%
16322	PROGRESSIVE DIRECT INS CO	OH	250,297,178	1.60%
26298	METROPOLITAN PROP & CAS INS CO	RI	240,824,896	1.54%
35882	GEICO GEN INS CO	NE	237,435,361	1.52%
40274	CITATION INS CO	MA	236,728,857	1.52%
19070	STANDARD FIRE INS CO	CT	226,103,235	1.45%
31534	CITIZENS INS CO OF AMER	MI	201,811,312	1.29%
26018	VERMONT MUT INS CO	VT	201,010,893	1.29%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	200,752,854	1.29%
41360	ARBELLA PROTECTION INS CO	MA	199,513,304	1.28%
22667	ACE AMER INS CO	PA	191,422,306	1.23%
20443	CONTINENTAL CAS CO	IL	185,585,805	1.19%

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
19437	LEXINGTON INS CO	DE	54,079,485	5.67%
35378	EVANSTON INS CO	IL	52,723,545	5.53%
36940	INDIAN HARBOR INS CO	DE	50,464,124	5.29%
17370	NAUTILUS INS CO	AZ	42,296,803	4.43%
20079	NATIONAL FIRE & MARINE INS CO	NE	36,920,116	3.87%
25445	IRONSHORE SPECIALTY INS CO	AZ	36,342,238	3.81%
41297	SCOTTSDALE INS CO	OH	36,148,989	3.79%
41718	ENDURANCE AMER SPECIALTY INS CO	DE	29,489,452	3.09%
26883	AIG SPECIALTY INS CO	IL	21,480,624	2.25%
31127	COLUMBIA CAS CO	IL	21,203,666	2.22%
13196	WESTERN WORLD INS CO	NH	20,186,052	2.12%
44520	CRUM & FORSTER SPECIALTY INS CO	DE	19,892,246	2.09%

10172	WESTCHESTER SURPLUS LINES INS CO	GA	19,332,666	2.03%
27960	ILLINOIS UNION INS CO	IL	19,117,726	2.00%
26387	STEADFAST INS CO	IL	18,095,821	1.90%
22829	INTERSTATE FIRE & CAS CO	IL	18,034,977	1.89%
10833	GEMINI INS CO	DE	17,695,161	1.85%
10725	LIBERTY SURPLUS INS CORP	NH	16,881,525	1.77%
37532	GREAT AMER E&S INS CO	OH	16,748,346	1.76%
24856	ADMIRAL INS CO	DE	16,322,867	1.71%

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	111,297,175	27.62%
51268	Connecticut Attorneys Title Ins Co	VT	71,901,471	17.85%
50520	Old Republic Natl Title Ins Co	FL	59,824,589	14.85%
50229	Chicago Title Ins Co	FL	50,609,248	12.56%
51586	Fidelity Natl Title Ins Co	FL	29,176,893	7.24%
50121	Stewart Title Guar Co	TX	26,870,137	6.67%
50083	Commonwealth Land Title Ins Co	FL	25,446,387	6.32%
50050	Westcor Land Title Ins Co	SC	13,518,276	3.36%
51152	WFG Natl Title Ins Co	SC	5,526,562	1.37%
50016	Title Resources Guar Co	TX	3,733,694	0.93%
50130	North Amer Title Ins Co	CA	2,537,491	0.63%
51411	American Guar Title Ins Co	OK	2,196,935	0.55%
51020	National Title Ins Of NY Inc	NY	194,380	0.05%
51632	Radian Title Ins Inc	OH	28,020	0.01%
51578	AmTrust Title Ins Co	NY	18,415	0.00%
11974	Amrock Title Ins Co	TX	11,085	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	83,358,387	6.82%
23841	NEW HAMPSHIRE INS CO	IL	74,969,511	6.13%
22667	ACE AMER INS CO	PA	56,059,028	4.59%
25682	TRAVELERS IND CO OF CT	CT	48,703,705	3.99%
11104	ASSOCIATED EMPLOYERS INS CO	MA	34,925,135	2.86%
40142	AMERICAN ZURICH INS CO	IL	34,198,459	2.80%
16535	ZURICH AMER INS CO	NY	33,164,343	2.71%
44326	ATLANTIC CHARTER INS CO	MA	32,214,423	2.64%
25658	TRAVELERS IND CO	CT	31,283,003	2.56%
25666	TRAVELERS IND CO OF AMER	CT	30,388,790	2.49%
30104	HARTFORD UNDERWRITERS INS CO	CT	27,438,976	2.25%
31470	NORGUARD INS CO	PA	25,810,360	2.11%
42390	AMGUARD INS CO	PA	25,323,158	2.07%
23035	LIBERTY MUT FIRE INS CO	WI	25,091,218	2.05%
33600	LM INS CORP	IL	23,439,663	1.92%
42404	LIBERTY INS CORP	IL	22,568,926	1.85%
11984	INDEPENDENCE CAS INS CO	MA	21,369,023	1.75%

29459	TWIN CITY FIRE INS CO	IN	20,589,776	1.68%
25674	TRAVELERS PROP CAS CO OF AMER	CT	20,175,055	1.65%
12262	PENNSYLVANIA MANUFACTURERS ASSOC INS	PA	17,692,141	1.45%
11984	INDEPENDENCE CAS INS CO	MA	21,369,023	1.75%
29459	TWIN CITY FIRE INS CO	IN	20,589,776	1.68%

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%
Total Companies Writing in MA	Group Code

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	MITSUMI 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	Total Premium Written 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	Total Premium Written in MA
34754	COMMERCE INS CO	MA	129,254,193	13.51%
41360	ARBELLA PROTECTION INS CO	MA	91,466,173	9.56%
39454	SAFETY INS CO	MA	66,141,697	6.91%
21750	PILGRIM INS CO	MA	45,782,274	4.78%
33618	SAFETY IND INS CO	MA	41,776,363	4.37%
18058	PHILADELPHIA IND INS CO	PA	35,694,964	3.73%
24260	PROGRESSIVE CAS INS CO	OH	29,546,573	3.09%
16535	ZURICH AMER INS CO	NY	21,851,760	2.28%
41840	ALLMERICA FIN BENEFIT INS CO	MI	21,827,268	2.28%
19046	TRAVELERS CAS INS CO OF AMER	CT	20,885,761	2.18%
31325	ACADIA INS CO	IA	16,976,665	1.77%
14788	NGM INS CO	FL	14,500,385	1.52%
23035	LIBERTY MUT FIRE INS CO	WI	13,839,199	1.45%

24082	OHIO SECURITY INS CO	NH	13,752,105	1.44%
24147	OLD REPUBLIC INS CO	PA	13,283,317	1.39%
25615	CHARTER OAK FIRE INS CO	CT	12,883,591	1.35%
25658	TRAVELERS IND CO	CT	12,710,424	1.33%
11770	UNITED FINANCIAL CAS CO	OH	12,157,542	1.27%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	11,932,820	1.25%
40274	CITATION INS CO	MA	11,451,448	1.20%

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	Total Premium Written 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	Total Premium Written 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	Total Premium Written 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%
NAIC #	Company Name	State	Written in MA	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%

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	Total Premium Written 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	Total Premium Written 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	Total Premium Written 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	Total Premium Written in MA
12219	BCBS OF MA HMO BLUE INC	MA	5,182,624,696	23.58%
53228	BCBS OF MA	MA	3,151,465,209	14.34%
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	MA	2,766,390,759	12.59%
14131	TUFTS HLTH PUBLIC PLANS INC	MA	2,394,473,674	10.89%
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	MA	2,267,339,847	10.32%
95541	FALLON COMM HLTH PLAN INC	MA	1,630,022,479	7.42%
96911	HARVARD PILGRIM HLTH CARE INC	MA	1,272,484,353	5.79%
11109	ALLWAYS HLTH PARTNERS INC	MA	859,113,733	3.91%
95673	HEALTH NEW ENGLAND INC	MA	775,637,880	3.53%
18975	HPHC INS CO INC	MA	357,814,420	1.63%
60117	TUFTS INS CO INC	MA	294,500,606	1.34%
52060	DENTAL SERV OF MA INC	MA	211,524,207	0.96%
95149	UNITEDHEALTHCARE OF NEW ENGLAND INC	RI	191,458,574	0.87%
60318	UNITED HLTHCARE INS CO OF IL	IL	143,900,887	0.65%
12575	SILVERSCRIPT INS CO	TN	101,988,823	0.46%
73288	HUMANA INS CO	WI	73,177,021	0.33%
10155	WELLCARE PRESCRIPTION INS INC	AZ	71,431,708	0.32%
52632	ALTUS DENTAL INS CO INC	RI	69,115,205	0.31%
39616	VISION SERV PLAN INS CO	OH	41,654,645	0.19%
15497	DSM MA INS CO INC	MA	23,097,586	0.11%

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

Homeowner's Multi-Peril

NAIC #	Company Name	State	Total Premium Written in MA	Total Premium Written in MA
40274	CITATION INS CO	MA	212,423,705	8.01%
17000	ARBELLA MUT INS CO	MA	128,248,906	4.83%
34754	COMMERCE INS CO	MA	123,922,478	4.67%
19976	AMICA MUT INS CO	RI	109,920,995	4.14%
33618	SAFETY IND INS CO	MA	108,840,540	4.10%
19798	MERRIMACK MUT FIRE INS CO	MA	94,125,558	3.55%
26018	VERMONT MUT INS CO	VT	91,611,582	3.45%
36447	LM GEN INS CO	IL	73,474,109	2.77%
23035	LIBERTY MUT FIRE INS CO	WI	70,278,114	2.65%
43001	NARRAGANSETT BAY INS CO	RI	64,855,885	2.44%
19763	BAY STATE INS CO	MA	56,518,470	2.13%

39454	SAFETY INS CO	MA	53,802,229	2.03%
26298	METROPOLITAN PROP & CAS INS CO	RI	53,023,713	2.00%
23043	LIBERTY MUT INS CO	MA	52,929,857	2.00%
15067	QUINCY MUT FIRE INS CO	MA	49,423,425	1.86%
10969	UNITED PROP & CAS INS CO	FL	48,856,831	1.84%
31534	CITIZENS INS CO OF AMER	MI	48,734,877	1.84%
25941	UNITED SERV AUTOMOBILE ASSN	TX	45,792,729	1.73%
12873	PRIVILEGE UNDERWRITERS RECP EXCH	FL	45,146,220	1.70%
20346	PACIFIC IND CO	WI	43,272,492	1.63%

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	Total Premium Written in MA
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	148,921,486	7.44%
20281	FEDERAL INS CO	IN	143,398,643	7.17%
37885	XL SPECIALTY INS CO	DE	114,187,293	5.71%
20443	CONTINENTAL CAS CO	IL	85,999,366	4.30%
22667	ACE AMER INS CO	PA	67,003,706	3.35%
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	51,943,350	2.60%
25674	TRAVELERS PROP CAS CO OF AMER	CT	50,358,382	2.52%
10641	ENDURANCE AMER INS CO	DE	42,573,394	2.13%
16535	ZURICH AMER INS CO	NY	40,235,328	2.01%
11150	ARCH INS CO	MO	39,028,255	1.95%
18058	PHILADELPHIA IND INS CO	PA	36,077,542	1.80%
10120	EVEREST NATL INS CO	DE	30,857,053	1.54%
25054	HUDSON INS CO	DE	30,508,996	1.52%
22292	HANOVER INS CO	NH	30,407,655	1.52%
37273	AXIS INS CO	IL	28,966,697	1.45%
37540	BEAZLEY INS CO INC	CT	28,414,609	1.42%
29599	US SPECIALTY INS CO	TX	28,037,811	1.40%
38318	STARR IND & LIAB CO	TX	26,364,112	1.32%
24147	OLD REPUBLIC INS CO	PA	25,192,601	1.26%
10690	ALLIED WORLD NATL ASSUR CO	NH	24,705,415	1.23%

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	Total Premium Written in MA
67091	Northwestern Mut Life Ins Co	WI	308,625,875	7.86%
66915	New York Life Ins Co	NY	262,835,366	6.69%
65935	Massachusetts Mut Life Ins Co	MA	254,821,421	6.49%
65978	Metropolitan Life Ins Co	NY	233,001,214	5.93%
65676	Lincoln Natl Life Ins Co	IN	176,002,276	4.48%
64246	Guardian Life Ins Co Of Amer	NY	165,846,581	4.22%
65838	John Hancock Life Ins Co USA	MI	163,284,235	4.16%
79227	Pruco Life Ins Co	AZ	153,059,198	3.90%
70435	The Savings Bank Mut Life Ins Co of	MA	147,240,605	3.75%
68241	Prudential Ins Co Of Amer	NJ	114,037,934	2.90%
70815	Hartford Life & Accident Ins Co	CT	90,023,594	2.29%
87726	Brighthouse Life Ins Co	DE	87,646,664	2.23%

86231	Transamerica Life Ins Co	IA	86,721,498	2.21%
91596	New York Life Ins & Ann Corp	DE	67,078,921	1.71%
60488	American Gen Life Ins Co	TX	58,369,191	1.49%
69868	United Of Omaha Life Ins Co	NE	53,647,082	1.37%
62235	Unum Life Ins Co Of Amer	ME	53,408,224	1.36%
65315	Lincoln Life Assur Co of Boston	NH	51,560,578	1.31%
66168	Minnesota Life Ins Co	MN	50,290,394	1.28%
67466	Pacific Life Ins Co	NE	48,664,473	1.24%

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	Total Premium Written in MA
65935	Massachusetts Mut Life Ins Co	MA	3,054,477,538	17.26%
86509	Voya Retirement Ins & Ann Co	CT	1,089,292,020	6.15%
69345	Teachers Ins & Ann Assoc Of Amer	NY	817,150,540	4.62%
65978	Metropolitan Life Ins Co	NY	792,897,902	4.48%
66915	New York Life Ins Co	NY	717,449,741	4.05%
65838	John Hancock Life Ins Co USA	MI	706,993,390	3.99%
91596	New York Life Ins & Ann Corp	DE	653,954,063	3.69%
65676	Lincoln Natl Life Ins Co	IN	578,827,530	3.27%
65056	Jackson Natl Life Ins Co	MI	561,110,583	3.17%
67091	Northwestern Mut Life Ins Co	WI	363,872,705	2.06%
61689	Athene Ann & Life Co	IA	359,594,551	2.03%
62944	Equitable Financial Life Ins Co	NY	346,235,951	1.96%
86231	Transamerica Life Ins Co	IA	343,383,678	1.94%
60488	American Gen Life Ins Co	TX	340,220,193	1.92%
87726	Brighthouse Life Ins Co	DE	258,925,952	1.46%
66869	Nationwide Life Ins Co	OH	257,755,486	1.46%
61271	Principal Life Ins Co	IA	241,285,789	1.36%
79227	Pruco Life Ins Co	AZ	227,898,345	1.29%
68675	Security Benefit Life Ins Co	KS	227,485,451	1.29%
68241	Prudential Ins Co Of Amer	NJ	226,929,085	1.28%

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	Total Premium Written in MA
65935	Massachusetts Mut Life Ins Co	MA	1,139,848,355	33.77%
65838	John Hancock Life Ins Co USA	MI	542,746,259	16.08%
65978	Metropolitan Life Ins Co	NY	530,182,520	15.71%
66915	New York Life Ins Co	NY	427,520,547	12.67%
86231	Transamerica Life Ins Co	IA	179,956,981	5.33%
86509	Voya Retirement Ins & Ann Co	CT	117,877,749	3.49%
70688	Transamerica Financial Life Ins Co	NY	75,902,786	2.25%
69019	Standard Ins Co	OR	75,615,988	2.24%
93629	Prudential Retirement Ins & Ann Co	CT	67,888,318	2.01%
68241	Prudential Ins Co Of Amer	NJ	65,351,013	1.94%
62626	CMFG Life Ins Co	IA	47,215,271	1.40%
88668	Mutual Of Amer Life Ins Co	NY	46,191,187	1.37%
66168	Minnesota Life Ins Co	MN	34,256,178	1.01%

88072	Talcott Resolution Life Ins Co	CT	19,728,034	0.58%
62944	Equitable Financial Life Ins Co	NY	3,473,770	0.10%
71153	Talcott Resolution Life & Ann Ins Co	CT	662,564	0.02%
67172	Ohio Natl Life Ins Co	OH	607,911	0.02%
78778	Guardian Ins & Ann Co Inc	DE	295,388	0.01%
87726	Brighthouse Life Ins Co	DE	55	0.00%

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	Total Premium Written in MA
10206	MEDICAL PROFESSIONAL MUT INS CO	MA	62,817,298	56.18%
11843	MEDICAL PROTECTIVE CO	IN	13,390,229	11.97%
20427	AMERICAN CAS CO OF READING PA	PA	8,281,663	7.41%
15890	INTEGRIS INS CO	CT	5,752,313	5.14%
34495	DOCTORS CO AN INTERINS EXCH	CA	5,188,933	4.64%
10638	PROSELECT INS CO	NE	2,917,915	2.61%
42617	MAG MUT INS CO	GA	2,071,962	1.85%
19917	LIBERTY INS UNDERWRITERS INC	IL	1,807,942	1.62%
36277	MEDICAL MUT INS CO OF ME	ME	1,750,006	1.57%
22667	ACE AMER INS CO	PA	1,686,320	1.51%
14460	PROASSURANCE INS CO OF AMER	IL	1,554,399	1.39%
15865	NCMIC INS CO	IA	1,249,018	1.12%
35157	FAIR AMER INS & REINS CO	NY	861,842	0.77%
22730	ALLIED WORLD INS CO	NH	404,811	0.36%
18767	CHURCH MUT INS CO S I	WI	372,266	0.33%
10801	FORTRESS INS CO	IL	277,111	0.25%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	273,988	0.25%
13714	PHARMACISTS MUT INS CO	IA	263,435	0.24%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	181,554	0.16%
43460	ASPEN AMER INS CO	TX	175,241	0.16%

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	Total Premium Written in MA
40266	ARCH MORTGAGE INS CO	WI	29,169,122	22.48%
29858	MORTGAGE GUAR INS CORP	WI	22,075,759	17.01%
38458	GENWORTH MORTGAGE INS CORP	NC	18,527,457	14.28%
33790	RADIAN GUAR INC	PA	17,444,997	13.44%
13634	ESSENT GUAR INC	PA	13,709,080	10.57%
13695	NATIONAL MORTGAGE INS CORP	WI	12,308,379	9.49%
15873	UNITED GUAR RESIDENTIAL INS CO	NC	7,265,861	5.60%
18287	ASSURED GUAR MUNICIPAL CORP	NY	6,493,701	5.00%
28452	REPUBLIC MORTGAGE INS CO	NC	1,100,332	0.85%
18708	AMBAC ASSUR CORP	WI	779,327	0.60%
18732	ARCH MORTGAGE GUAR CO	WI	612,959	0.47%
14380	BUILD AMER MUT ASSUR CO	NY	159,540	0.12%
16675	GENWORTH MORTGAGE INS CORP OF NC	NC	43,583	0.03%
18740	MGIC IND CORP	WI	29,087	0.02%
12041	MBIA INS CORP	NY	16,733	0.01%

30180	ASSURED GUAR CORP	MD	13,705	0.01%
29114	ARCH MORTGAGE ASSUR CO	WI	3,627	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	Total Premium Written in MA
19917	LIBERTY INS UNDERWRITERS INC	IL	82,815,245	12.20%
20443	CONTINENTAL CAS CO	IL	56,273,508	8.29%
22667	ACE AMER INS CO	PA	34,784,769	5.13%
11991	NATIONAL CAS CO	OH	30,632,547	4.51%
12190	AMERICAN PET INS CO	NY	30,580,407	4.51%
21113	UNITED STATES FIRE INS CO	DE	16,428,277	2.42%
11630	JEFFERSON INS CO	NY	14,848,221	2.19%
25674	TRAVELERS PROP CAS CO OF AMER	CT	13,978,929	2.06%
27154	ATLANTIC SPECIALTY INS CO	NY	13,081,386	1.93%
16691	GREAT AMER INS CO	OH	12,646,090	1.86%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	12,346,548	1.82%
22292	HANOVER INS CO	NH	12,218,552	1.80%
21482	FACTORY MUT INS CO	RI	11,918,595	1.76%
16535	ZURICH AMER INS CO	NY	11,235,074	1.66%
37885	XL SPECIALTY INS CO	DE	9,917,799	1.46%
37923	GEICO MARINE INS CO	NE	9,820,630	1.45%
31325	ACADIA INS CO	IA	9,258,642	1.36%
10111	AMERICAN BANKERS INS CO OF FL	FL	8,402,054	1.24%
23841	NEW HAMPSHIRE INS CO	IL	8,137,147	1.20%
20346	PACIFIC IND CO	WI	8,056,010	1.19%

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	Total Premium Written in MA
34754	COMMERCE INS CO	MA	1,122,673,752	20.72%
22063	GOVERNMENT EMPLOYEES INS CO	NE	554,870,007	10.24%
39454	SAFETY INS CO	MA	422,514,910	7.80%
17000	ARBELLA MUT INS CO	MA	399,404,962	7.37%
14737	PLYMOUTH ROCK ASSUR CORP	MA	356,765,393	6.58%
16322	PROGRESSIVE DIRECT INS CO	OH	247,166,745	4.56%
35882	GEICO GEN INS CO	NE	237,435,361	4.38%
36447	LM GEN INS CO	IL	221,611,688	4.09%
23043	LIBERTY MUT INS CO	MA	219,692,956	4.05%
19070	STANDARD FIRE INS CO	CT	193,139,612	3.56%
26298	METROPOLITAN PROP & CAS INS CO	RI	172,735,341	3.19%
19976	AMICA MUT INS CO	RI	145,492,367	2.68%
31534	CITIZENS INS CO OF AMER	MI	107,094,345	1.98%
19232	ALLSTATE INS CO	IL	91,819,194	1.69%
24260	PROGRESSIVE CAS INS CO	OH	86,610,540	1.60%
15067	QUINCY MUT FIRE INS CO	MA	79,785,442	1.47%
12484	LIBERTY MUT PERSONAL INS CO	NH	76,210,434	1.41%

25968	USAA CAS INS CO	TX	64,462,811	1.19%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	58,914,323	1.09%
22292	HANOVER INS CO	NH	53,571,154	0.99%

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	Total Premium Written in MA
34754	COMMERCE INS CO	MA	1,409,950,822	9.03%
39454	SAFETY INS CO	MA	578,979,894	3.71%
22063	GOVERNMENT EMPLOYEES INS CO	NE	561,183,023	3.59%
17000	ARBELLA MUT INS CO	MA	545,211,947	3.49%
14737	PLYMOUTH ROCK ASSUR CORP	MA	361,157,919	2.31%
23043	LIBERTY MUT INS CO	MA	324,728,061	2.08%
36447	LM GEN INS CO	IL	296,559,086	1.90%
20281	FEDERAL INS CO	IN	282,915,058	1.81%
19976	AMICA MUT INS CO	RI	269,912,523	1.73%
16322	PROGRESSIVE DIRECT INS CO	OH	250,297,178	1.60%
26298	METROPOLITAN PROP & CAS INS CO	RI	240,824,896	1.54%
35882	GEICO GEN INS CO	NE	237,435,361	1.52%
40274	CITATION INS CO	MA	236,728,857	1.52%
19070	STANDARD FIRE INS CO	CT	226,103,235	1.45%
31534	CITIZENS INS CO OF AMER	MI	201,811,312	1.29%
26018	VERMONT MUT INS CO	VT	201,010,893	1.29%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	200,752,854	1.29%
41360	ARBELLA PROTECTION INS CO	MA	199,513,304	1.28%
22667	ACE AMER INS CO	PA	191,422,306	1.23%
20443	CONTINENTAL CAS CO	IL	185,585,805	1.19%

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	Total Premium Written in MA
19437	LEXINGTON INS CO	DE	54,079,485	5.67%
35378	EVANSTON INS CO	IL	52,723,545	5.53%
36940	INDIAN HARBOR INS CO	DE	50,464,124	5.29%
17370	NAUTILUS INS CO	AZ	42,296,803	4.43%
20079	NATIONAL FIRE & MARINE INS CO	NE	36,920,116	3.87%
25445	IRONSHORE SPECIALTY INS CO	AZ	36,342,238	3.81%
41297	SCOTTSDALE INS CO	OH	36,148,989	3.79%
41718	ENDURANCE AMER SPECIALTY INS CO	DE	29,489,452	3.09%
26883	AIG SPECIALTY INS CO	IL	21,480,624	2.25%
31127	COLUMBIA CAS CO	IL	21,203,666	2.22%
13196	WESTERN WORLD INS CO	NH	20,186,052	2.12%
44520	CRUM & FORSTER SPECIALTY INS CO	DE	19,892,246	2.09%
10172	WESTCHESTER SURPLUS LINES INS CO	GA	19,332,666	2.03%
27960	ILLINOIS UNION INS CO	IL	19,117,726	2.00%
26387	STEADFAST INS CO	IL	18,095,821	1.90%
22829	INTERSTATE FIRE & CAS CO	IL	18,034,977	1.89%
10833	GEMINI INS CO	DE	17,695,161	1.85%
10725	LIBERTY SURPLUS INS CORP	NH	16,881,525	1.77%

37532	GREAT AMER E&S INS CO	OH	16,748,346	1.76%
24856	ADMIRAL INS CO	DE	16,322,867	1.71%

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	Total Premium Written in MA
50814	First Amer Title Ins Co	NE	111,297,175	27.62%
51268	Connecticut Attorneys Title Ins Co	VT	71,901,471	17.85%
50520	Old Republic Natl Title Ins Co	FL	59,824,589	14.85%
50229	Chicago Title Ins Co	FL	50,609,248	12.56%
51586	Fidelity Natl Title Ins Co	FL	29,176,893	7.24%
50121	Stewart Title Guar Co	TX	26,870,137	6.67%
50083	Commonwealth Land Title Ins Co	FL	25,446,387	6.32%
50050	Westcor Land Title Ins Co	SC	13,518,276	3.36%
51152	WFG Natl Title Ins Co	SC	5,526,562	1.37%
50016	Title Resources Guar Co	TX	3,733,694	0.93%
50130	North Amer Title Ins Co	CA	2,537,491	0.63%
51411	American Guar Title Ins Co	OK	2,196,935	0.55%
51020	National Title Ins Of NY Inc	NY	194,380	0.05%
51632	Radian Title Ins Inc	OH	28,020	0.01%
51578	AmTrust Title Ins Co	NY	18,415	0.00%
11974	Amrock Title Ins Co	TX	11,085	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	Total Premium Written in MA
33758	ASSOCIATED INDUSTRIES OF MA MUT INS	MA	83,358,387	6.82%
23841	NEW HAMPSHIRE INS CO	IL	74,969,511	6.13%
22667	ACE AMER INS CO	PA	56,059,028	4.59%
25682	TRAVELERS IND CO OF CT	CT	48,703,705	3.99%
11104	ASSOCIATED EMPLOYERS INS CO	MA	34,925,135	2.86%
40142	AMERICAN ZURICH INS CO	IL	34,198,459	2.80%
16535	ZURICH AMER INS CO	NY	33,164,343	2.71%
44326	ATLANTIC CHARTER INS CO	MA	32,214,423	2.64%
25658	TRAVELERS IND CO	CT	31,283,003	2.56%
25666	TRAVELERS IND CO OF AMER	CT	30,388,790	2.49%
30104	HARTFORD UNDERWRITERS INS CO	CT	27,438,976	2.25%
31470	NORGUARD INS CO	PA	25,810,360	2.11%
42390	AMGUARD INS CO	PA	25,323,158	2.07%
23035	LIBERTY MUT FIRE INS CO	WI	25,091,218	2.05%
33600	LM INS CORP	IL	23,439,663	1.92%
42404	LIBERTY INS CORP	IL	22,568,926	1.85%
11984	INDEPENDENCE CAS INS CO	MA	21,369,023	1.75%
29459	TWIN CITY FIRE INS CO	IN	20,589,776	1.68%
25674	TRAVELERS PROP CAS CO OF AMER	CT	20,175,055	1.65%
12262	PENNSYLVANIA MANUFACTURERS ASSOC INS	PA	17,692,141	1.45%
40142	AMERICAN ZURICH INS CO	IL	34,198,459	2.80%
16535	ZURICH AMER INS CO	NY	33,164,343	2.71%

44326	ATLANTIC CHARTER INS CO	MA	32,214,423	2.64%
25658	TRAVELERS IND CO	CT	31,283,003	2.56%
25666	TRAVELERS IND CO OF AMER	CT	30,388,790	2.49%

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%
Total Companies Writing in MA	Group Code

2020 Annual Report