

Massachusetts Division of Insurance

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# 2021 Annual Report



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# Division of Insurance

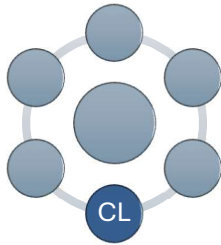
## Mission

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

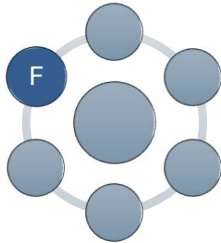
The Division protects consumers and promotes a fiscally sound insurance marketplace through the performance of six primary activities. Taken together, these activities represent the core of effective insurance regulation.





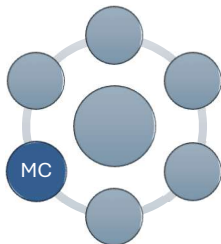
### **License Insurance Companies (CL)**

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



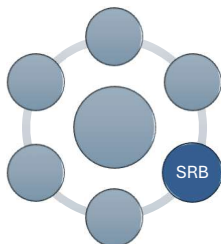
### **Examine the Financial Condition of Insurance Companies (F)**

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)**

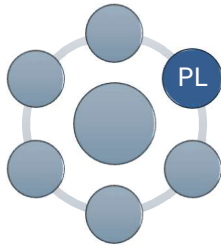
Beyond the financial health of an insurer, the Division also examines how the company interacts with policyholders and potential customers. The market conduct process looks beyond the financial condition of a company and examines business practices such as policy underwriting and rating, cancellations 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)**

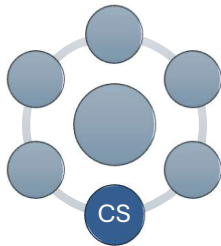
By reviewing and approving insurance policy forms, rules, rates and associated program procedures and operations, the Division verifies that the insurance products sold to Massachusetts consumers by licensed insurance companies comply with the Commonwealth's laws and regulations.





### **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.

## **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 July 30, 2021, the Division Employed 113 full-time employees.

### **Division of Insurance Staffing Levels**

**1979** – 193 staff  
**2021** – 113 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 2021, the Division billed assessments totaling over \$73 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 2021, (July 1, 2020) through June 30, 2021, the Division collected nearly \$210 million in revenue.

**Division of Insurance Budget for FY2021**

**\$16,287,997**

**Total Collections for the General Fund for FY2021 \$209,960,632.90**

## **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 2021, Massachusetts was the domicile state of:

- 47 property and casualty insurers
- 16 life and accident and sickness insurers
- 17 health organizations
- 2 lodge fraternal benefit associations
- 1 title insurers
- 17 workers' compensation self-insured groups
- 3 residual market pools
- 140 fraternal benefit and mutual aid societies

In 2021, Massachusetts was the Principal Regulator for 83 Insurance Companies and Related Organizations.

### **Company Market Share**

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.

## TOP 10 COMPANIES OF SELECTED MARKET SECTORS

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

UNITEDHEALTHCARE INSURANCE CO	33.36%
AETNA LIFE INSURANCE CO	12.04%
CIGNA HEALTH & LIFE INSURANCE CO	8.64%
METROPOLITAN LIFE INSURANCE CO	5.48%
UNUM LIFE INSURANCE CO OF AMER	3.55%
US BR SUN LIFE ASSURANCE CO OF CANADA	2.92%
GUARDIAN LIFE INSURANCE CO OF AMER	2.84%
LINCOLN NATIONAL LIFE INSURANCE CO	2.59%
HARTFORD LIFE & ACCIDENT INSURANCE CO	1.96%
GENWORTH LIFE INSURANCE CO	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 INSURANCE CO	7.67%
ARBELLA MUTUAL INSURANCE CO	4.58%
COMMERCE INSURANCE CO	4.56%
AMICA MUTUAL INSURANCE CO	3.96%
SAFETY INDEMNITY INSURANCE CO	3.93%
VERMONT MUTUAL INSURANCE CO	3.32%
MERRIMACK MUTUAL FIRE INSURANCE CO	3.28%
LM GENERAL INSURANCE CO	2.98%
NARRAGANSETT BAY INSURANCE CO	2.48%
LIBERTY MUTUAL FIRE INSURANCE CO	2.43%

### Top 10 Life Insurance Companies

NORTHWESTERN MUTUAL LIFE INSURANCE CO	WI	11.25%
MASSACHUSETTS MUTUAL LIFE INSURANCE CO	MA	8.24%
NEW YORK LIFE INSURANCE CO	NY	6.19%
METROPOLITAN LIFE INSURANCE CO	NY	5.71%
LINCOLN NATIONAL LIFE INSURANCE CO	IN	4.79%
NEW YORK LIFE INSURANCE & ANNUITY CORP	DE	4.69%
JOHN HANCOCK LIFE INSURANCE CO USA	MI	3.90%
PRUCO LIFE INSURANCE CO	AZ	3.77%
GUARDIAN LIFE INSURANCE CO OF AMERICA	NY	3.69%
THE SAVINGS BANK MUTUAL LIFE INSURANCE CO OF MA	MA	3.09%

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

COMMERCE INSURANCE CO	19.34%
GOVERNMENT EMPLOYEES INSURANCE CO	10.63%
ARBELLA MUTUAL INSURANCE CO	7.45%
SAFETY INSURANCE CO	7.35%
PLYMOUTH ROCK ASSURANCE CORP	6.56%
GEICO GEN INSURANCE CO	5.91%
PROGRESSIVE DIRECT INSURANCE CO	4.78%
STANDARD FIRE INSURANCE CO	4.00%
LIBERTY MUTUAL INSURANCE CO	3.55%
LM GENERAL INSURANCE CO	3.04%

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

ASSOCIATED INDUSTRIES OF MA MUTUAL INSURANCE	6.85%
ACE AMERICA INSURANCE CO	4.59%
TRAVELERS INDEMNITY CO OF CT	3.57%
AMERICAN ZURICH INSURANCE CO	3.14%
ASSOCIATED EMPLOYERS INSURANCE CO	3.08%
ZURICH AMERICA INSURANCE CO	2.84%
ATLANTIC CHARTER INSURANCE CO	2.63%
HARTFORD UNDERWRITERS INSURANCE CO	2.60%
TRAVELERS INDEMNITY CO OF AMERICA	2.33%
LM INSURANCE CORP	2.04%

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

COMMERCE INSURANCE CO	8.29%
GOVERNMENT EMPLOYEES INSURANCE CO	3.61%
SAFETY INSURANCE CO	3.45%
ARBELLA MUTUAL INSURANCE CO	3.38%
PLYMOUTH ROCK ASSURANCE CORP	2.24%
GEICO GENERAL INSURANCE CO	1.99%
FEDERAL INSURANCE CO	1.84%
LIBERTY MUTUAL INSURANCE CO	1.82%
PROGRESSIVE DIRECT INSURANCE CO	1.63%
STANDARD FIRE INSURANCE CO	1.54%

# 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.

## 2021 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 \$663,000 in 2021.

## **Financial Surveillance**

The Financial Surveillance Section monitors the solvency of domestic and foreign (domiciled in another state) insurance companies. There are currently 1,918 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, 2021, there were 83 insurance companies domiciled in Massachusetts. Of the 83 Massachusetts domestic insurers, there were 47 property and casualty insurers, 16 life insurers, 17 health insurers, 2 fraternal benefit societies and 1 title insurer. These insurers wrote gross premiums of approximately \$87 billion during 2021.

Five Year Trends: Amended licenses

- 2017 - 24
- 2018 - 12
- 2019 - 25
- 2020 - 32
- 2021 - 25

Five Year Trends: New licenses

- 2017 - 40
- 2018 - 38
- 2019 - 33
- 2020 - 55
- 2021 - 69

## **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 2021, the Company Licensing Section:

- Issued four HMO and one property & casualty certificate of authority to new domestic insurers;
- Issued twenty-five new insurance company licenses and twenty-five amended insurance company licenses;
- Approved fourteen companies as eligible to accept surplus lines placements;
- Issued Certificates of Authority to four life settlement providers;
- Approved two companies as accredited reinsurers; and
- Issued Certificates of Authority to nineteen home service contract providers.

In addition, eight companies became eligible alien unauthorized insurers

## **New Licenses, Authority or Eligibility**

### **Accredited Reinsurers**

ACCREDITED SPECIALTY INSURANCE COMPANY  
ASPEN SPECIALTY INSURANCE COMPANY

### **Health Maintenance Organizations**

CCA HMO COMPLETE, LLC/COMMONWEALTH CARE ALLIANCE  
CENTRAL MASS HEALTH, LLC  
ETERNALHEALTH INC.  
WELLCARE HEALTH PLANS OF MASSACHUSETTS  
HUMANA WISCONSIN HEALTH ORGANIZATION INSURANCE CORPORATION  
MOLINA HEALTHCARE OF WISCONSIN, INC.  
UNITED HEALTHCARE OF WISCONSIN, INC.

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

FUNERAL DIRECTORS LIFE INSURANCE COMPANY  
PACIFIC GUARDIAN LIFE INSURANCE CO., LTD.  
MANHATTANLIFE OF AMERICA INSURANCE COMPANY

### **Surplus Lines**

AZGUARD INSURANCE COMPANY 3/1/2021  
AWBURY INSURANCE COMPANY  
EVERSPAN INDEMNITY INSURANCE CO.  
GRAY SURPLUS LINES INSURANCE CO.  
HIGHLANDER SPECIALTY INSURANCE CO.



PALOMAR EXCESS AND SURPLUS INSURANCE CO.  
SUMMIT SPECIALTY INSURANCE CO.  
SUTTON SPECIALTY INSURANCE COMPANY  
TEXAS INSURANCE CO.  
VANTAGE RISK SPECIALTY INS. CO.  
WESTFIELD SPECIALTY INS. CO.  
ACCREDITED SURPLUS LINES INSURANCE COMPANY  
ACCELERANT SPECIALTY INSURANCE COMPANY  
OBSIDIAN SPECIALTY INS. CO.

### **Home Service Contract Providers**

ABS RISK, LLC  
ASSURANCE EXPRESS, LLC  
BEST BUY PRODUCT PROTECTION, INC.  
BGE HOME PRODUCTS & SERVICES, LLC  
DOMESTIC & GENERAL USA SERVICES LLC  
ECP INCORPORATED  
EGV COMPANIES, INC.  
ELITE HOME WARRANTY LLC  
EXTEND WARRANTY SERVICES CORP.  
GOAL ZERO LLC  
HIPPO WARRANTY SOLUTIONS, INC.  
INTEGRITY ADMIN GROUP, INC.  
IRONWOOD WARRANTY, LLC  
MAXX'S PRODUCTS, LLC  
ROADSIDE PROTECT, INC.  
SELECT HOME WARRANTY, LLC  
THPMA, INC. DBA TOTAL HOME PROTECTION  
WESTERN SERVICE CONTRACT CORP.  
TRANSFORM SR PROTECTION LLC

### **Property & Casualty Insurers**

SAFETY NORTHEAST INSURANCE COMPANY  
ALLIED INSURANCE COMPANY OF AMERICA  
AMERICAN AGRICULTURAL INSURANCE CO.  
ARI INSURANCE COMPANY  
BEAZLEY AMERICA INSURANCE CO., INC.  
BRICKSTREET MUTUAL INSURANCE COMPANY  
COLISEUM REINSURANCE CO.  
GREAT PLAINS CASUALTY, INC.  
HOMEOWNERS CHOICE PROPERTY & CASUALTY INS. CO.  
MOBILITAS GENERAL INSURANCE COMPANY  
NEXT INSURANCE US COMPANY  
NORTHSTONE INSURANCE COMPANY  
OBSIDIAN INSURANCE CO.  
PINNACLEPOINT INSURANCE COMPANY

PREFERRED EMPLOYERS INSURANCE COMPANY  
SERVICE LLOYDS INSURANCE COMPANY  
SOUTHERN INSURANCE COMPANY  
SUMMITPOINT INSURANCE COMPANY  
TRISURA INSURANCE COMPANY  
TYPTAP INSURANCE COMPANY

### **Life Settlement Provider**

AGILE INSURANCE SOLUTIONS LLC  
APEX SETTLEMENT GROUP LLC  
EAGIL LIFE SETTLEMENTS, LLC  
LIFEROC CAPITAL, LLC

## **Notable Transactions**

Notable Transactions There were several changes to the composition of the Massachusetts domestic insurance market in 2021. These included the following:

### **AllWays Health Partners, Inc.**

- Effective June 2021 the Company may borrow up to \$50 million from Mass General Brigham Incorporated.

### **AllWays Health Partners Insurance Company**

- In December 2021 a \$1 million surplus contribution was received from Mass General Brigham Incorporated.

### **Atlantic Charter Insurance Company**

- An ordinary dividend of \$25 million was paid to the owners in 2021.

### **Barnstable County Mutual Insurance Company**

- The Company entered a new pooling agreement effective January 1, 2021, with Mutual Reinsurance Bureau. Therefore, the company is now classified as multi-state insurer.

### **Bunker Hill Ins. Casualty Co.**

- The Company received \$4.1 million of paid in capital from its parent company, Plymouth Rock Home Assurance Company.

### **Bunker Hill Preferred Insurance Company**

- The Company received \$4.8 million of paid in capital from its parent company, the Plymouth Rock Home Assurance Company.

### **Bunker Hill Property Insurance Company**

- The Company received \$4.8 million of paid in capital from its parent company, the Plymouth Rock Home Assurance Company.

**Bunker Hill Insurance Company**

- The Company received a \$4.8 million of paid in capital from its parent company, the Plymouth Rock Home Assurance Company.

**Central Mass Health LLC**

- Effective April 2021 the Company was licensed as a Massachusetts domestic HMO.

**Coface North America Ins. Co.**

- In 2020 the French bank Natixis SA announced its intention to sell its 29.5% ownership stake in the French publicly traded COFACE SA to Arch Financial Holdings Europe IV Limited, an affiliate of Arch Capital Group Ltd. COFACE SA is the indirect parent company of the Company. The transaction closed February 10, 2021.

**Commerce Insurance Company & Citation Insurance Company**

- On March 12, 2021, MAPFRE SA announced that MAPFRE USA would withdraw from the Pennsylvanian market, and that Verti would begin non-renewal of policies.
- On August 10, 2021, MAPFRE USA and AAA Washington Form Jointly Owned Insurance Company operating in Washington and North Idaho

**Commonwealth Annuity & Life Insurance Company**

- A change in control of the Company was filed in 2020 and approved by the Division on January 28, 2021. In 2021 KKR acquired all of the outstanding shares Global Atlantic Financial Group Limited, the ultimate parent of the Company.
- On March 31, 2021, the Company entered into a master retrocession agreement with an affiliated party whereby it retroceded \$5.2 billion of reserves and established a deposit receivable of \$1 billion.
- Effective July 1, 2021, the Company entered into a coinsurance agreement with USAA Life Insurance Company whereby it assumed fixed annuity business. The total assumed reserves were \$3.04 billion; subsequently, the Company entered into a retrocession agreement where reserves of \$912.9 million were ceded to a third party.
- Effective July 1, 2021, the Company entered into a coinsurance agreement with Riversource Life Insurance Company whereby it assumed fixed annuity business. The total assumed reserves were \$7.14 billion; subsequently, the Company entered into retrocession agreements where reserves of \$2.22 billion and \$2.954 billion were ceded to third parties.
- On July 9, 2021, the Company received a \$265 million capital contribution from its parent.
- Effective August 1, 2021, the Company entered into a coinsurance agreement with Pacific Life Insurance Company whereby it assumed new fixed annuity business. The total accumulated assumed reserves were \$405.8 million as of March 31, 2022.
- On December 10, 2021, the Company received a \$375 million capital contribution from its parent; the Company used these funds and made a \$375 million cash contribution to affiliate Forethought Life Insurance Company.

**Electric Insurance Company**

- The Company paid an ordinary dividend of \$38.5 million to its parent in 2021.

- The Company sold 100% of its Irish subsidiary Electric Insurance Ireland Designated Activity Company for \$8.9 million.

#### **eternalHealth, Inc.**

- Effective April 2021 the Company was licensed as a Massachusetts domestic HMO.
- In 2021 the Company issued \$2 million of surplus notes.

#### **First Allmerica Financial Life Insurance Company**

- A change in control of the Company was filed in 2020 and approved by the Division on January 28, 2021. In 2021 KKR acquired all of the outstanding shares Global Atlantic Financial Group Limited, the ultimate parent of the Company.
- Effective July 30, 2021, the Division approved a request to reset gross paid and contributed surplus and unassigned funds under a quasi-reorganization pursuant to SSAP No. 72 with an effective date of June 30, 2021. The reset was requested following the February 1, 2021, change in control.
- Effective July 1, 2021, the Company entered into a coinsurance agreement with USAA Life Insurance Company whereby it assumed fixed annuity business. The total assumed reserves were \$209.3 million; subsequently, the Company entered into a retrocession agreement where reserves of \$62.8 million were ceded to a third party.

#### **Fallon Community Health Plan, Inc.**

- FCHP made a business decision to focus on its government sponsored programs which is a direction that is more aligned with the Company's mission and vision. As a result, FCHP decided to discontinue selling its commercial products in the Commonwealth of Massachusetts as of April 1, 2021. These actions will result in the complete withdrawal from the commercial Fallon Community Health Plan, Inc. These actions will result in the complete withdrawal from the commercial market of FCHP's Select Care and Direct Care HMO products by the end of 2022. FCHP will continue to sell its Community Care product on the Massachusetts Health Connector.

#### **John Hancock Life & Health Insurance Company**

- On April 6, 2021, the Company introduced a new Protection Variable Life Insurance product.

#### **Harvard Pilgrim Health Care, Inc.**

- December 31, 2021, the Company received a \$70million capital contribution from Point32Health Inc.

#### **Harvard Pilgrim Health Care of New England, Inc.**

- In late 2021, the Company received \$40 million from its parent, Harvard Pilgrim Health Care, Inc.
- The Company recorded a \$25 million capital contribution receivable from its parent which was settled on February 22, 2022.

#### **Liberty Mutual Insurance Company**

- The Company received \$859.6 million of paid in surplus from its parent.

- In July 2021 Liberty announced the intent to acquire State Auto Group, a super-regional insurance holding company headquartered in Columbus, Ohio. In September 2021 State Auto Financial shareholders signed off on the proposed acquisition. The deal was closed March 1, 2022. Under the terms of the agreement – which received all required regulatory approvals – State Automobile Mutual Insurance Company members became mutual members of Liberty Mutual Holding Company Inc. and Liberty Mutual acquired all of the publicly held shares of common stock of State Auto Financial Corp.

#### **Longevity Health Plan of Massachusetts, Inc.**

- Effective May 4th, 2022, the Company was licensed as a Massachusetts domestic HMO.

#### **Massachusetts Mutual Life Insurance Company**

- On January 4, 2021, MassMutual completed the sale of its entire retirement plan business to Empower Retirement, an indirect wholly owned subsidiary of Great-West Life & Annuity Insurance Company.
- On May 28, 2021, MassMutual completed acquisition of American Financial Group, Inc.'s subsidiary, Great American Life Insurance Company ("GALIC") for \$3.5 billion.
- On July 21, 2021, MassMutual sponsored new reinsurer, Martello Re Limited, a Bermuda exempted company that was incorporated on 7/21/21 and is licensed as a Long-Term Class E reinsurer by the Bermuda Monetary Authority.

#### **New England Life Insurance Company**

- In November 2021 the Company paid a \$44 million ordinary dividend paid to its parent, Brighthouse Holdings, LLC.

#### **The Paul Revere Life Insurance Company**

- The Company paid a total of \$215.0 million dividend included \$50.0 million of ordinary cash dividends, and an extraordinary dividend of \$165.0 million in the form of its 10.1 percent ownership of the common stock of Provident Life in September 2021.

#### **Plymouth Rock Home Assurance Company**

- The Company received a capital contribution of \$21 million from its parent company, the Plymouth Rock Company Inc. Of this amount, \$4.1 million was then distributed to its wholly owned subsidiary Bunker Hill Insurance Casualty Company; \$4.8 million was then distributed to each of its wholly owned subsidiaries Bunker Hill Property Insurance Company, Bunker Hill Preferred Insurance Company, and Bunker Hill Insurance Company.

#### **Point32Health, Inc.**

Effective January 1, 2021, Health Plan Holdings, Inc. became the corporate parent of Harvard Pilgrim and its affiliates. Effective July 1, 2021, the ultimate corporate parent company changed its name from Health Plan Holdings, Inc. to Point32Health, Inc. Point32Health, Inc. is the ultimate corporate parent company of the following companies:

- Harvard Pilgrim Group
  - Harvard Pilgrim Health Care, Inc.
  - HPHC Insurance Company

- Harvard Pilgrim Health Care of New England, Inc.
- Tufts Group
  - Tufts Associated Health Maintenance Organization, Inc.
  - Tufts Health Public Plans, Inc.
  - Tufts Insurance Company Pilgrim Health Care of New England, Inc

### **The Savings Bank Mutual Life Insurance Company**

- The Company received a \$10 million dividend from a wholly owned affiliate, SBLI VT Re, in 2021.

### **Tufts Health Maintenance Organization, Inc.**

- On December 31, 2021, the Company distributed \$120 million to Point32Health, Inc.; subsequently, Point32Health, Inc. distributed \$50 million to Tufts Health Public Plan, Inc. and \$70 million to Harvard Pilgrim Health Care, Inc.

### **Tufts Health Public Plans, Inc.**

- On December 31, 2021, the Company received a capital contribution of \$50 million from its parent, Point32Health, Inc.

### **WellCare Health Plans of Massachusetts, Inc.**

- Effective April 2021 the Company was licensed as a Massachusetts domestic HMO.

## **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.

### **2021 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 and Regulations. 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 is in compliance with applicable laws, rules and regulations. The Division considers the concepts of materiality and risk in planning and conducting an examination and directs its examination efforts accordingly.

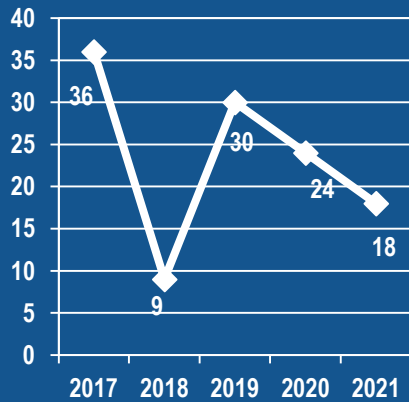
In 2021, the Financial Examination Section completed routine statutory examinations of eighteen insuring organizations. These companies produced \$26.8 billion in premium nationwide - \$2.9 billion in Massachusetts.

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 eighteen full-scope financial examinations with an "as of" date of December 31, 2019. All these examinations were completed by June 30, 2021, within the "18 Month Rule" timeframe noted above.

Twenty-seven examinations were in progress at year's end, representing approximately \$14.6 billion in premium nationwide - \$11.9 billion in Massachusetts.

### Five Year Trends: Completed Examinations



### Examinations Completed in 2021

4 Life, Accident & Health  
8 Property & Casualty Ins.  
5 Health Insurers  
0 Residual Market  
0 Self-Insured Groups  
1 Fraternal Insurers

### Examinations In Progress 12/31/2021

	US Direct Premium	MA Direct Premium	Surplus
<b>Property &amp; Casualty Insurers</b>			
Arbella Indemnity Insurance Company	26,379,000	25,073,000	22,398,000
Arbella Mutual Insurance Company	545,212,000	545,212,000	836,506,000
Arbella Protection Insurance Company	241,771,000	199,513,000	132,555,000
Atlantic Charter Insurance Company	39,587,000	32,214,000	71,903,000
Barnstable County Insurance Company	4,280,000	4,280,000	25,886,954
Barnstable County Mutual Insurance Company	26,949,000	26,949,000	100,239,000
Endeavour Insurance Company	3,880,000	3,880,000	6,673,000
Independence Casualty Insurance Company	21,369,000	21,369,000	4,992,000
<b>Health Insurers</b>			
Boston Medical Center Health Plan Inc.	2,754,800,000	2,267,340,000	427,869,000
Fallon Community Health Plan, Inc.	1,630,022,000	1,630,022,000	232,268,000
Fallon Health and Life Assurance Company, Inc.	22,371,000	22,371,000	10,195,000



Harvard Pilgrim Health Care, Inc.	1,753,233,000	1,272,484,000	726,876,000
Harvard Pilgrim Health Care of New England, Inc.	544,155,000	7,161,000	56,381,000
HPHC Insurance Company, Inc.	670,766,000	357,814,000	136,257,000
Tufts Associated Health Maintenance Organization, Inc.	2,802,177,000	2,766,391,000	738,870,000
Tufts Insurance Company, Inc.	320,020,000	294,501,000	69,677,000
Tufts Public Plans, Inc.	2,456,615,000	2,394,440,000	338,248,000
<b>Life, Accident &amp; Health Insurers</b>			
Berkshire Life Insurance Company of America	637,452,000	26,903,000	212,988,000
Centre Life Insurance Company	12,500,000	507,000	84,992,000
<b>Fraternal Insurers</b>			
Supreme Council of The Royal Arcanum	6,050,000	2,240,000	11,256,000
<b>Self-Insurance Groups</b>			
ABC Massachusetts Workers' Compensation Self Insurance Group	3,482,000	3,482,000	0
Independent School Compensation Corporation	10,037,000	10,037,000	0
Massachusetts McDonald's Operators' Workers' Compensation Group	1,945,000	1,945,000	0
NEEIA Compensation Inc	8,083,000	8,083,000	0
School Transportation Association of Massachusetts Self Insurance Group	4,437,000	4,437,000	0
Self Insured Lumber Business Association Inc	4,349,000	4,349,000	42,000
<b>TOTALS</b>	<b>14,551,921,000</b>	<b>11,932,997,000</b>	<b>4,247,071,954</b>

<b>Examination Reports Issued 12/31/2021</b>			
	<b>US Direct Premium</b>	<b>MA Direct Premium</b>	<b>Surplus</b>
<b>Property &amp; Casualty Insurers</b>			
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
<b>Health Insurers</b>			
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
<b>Life, Accident &amp; Health Insurers</b>			
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
<b>Fraternal Insurers</b>			
Catholic Association of Foresters	112,000	95,000	3,180,000
<b>TOTALS</b>	<b>26,823,468,000</b>	<b>2,860,772,529</b>	<b>27,105,629,378</b>

## 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 approximately 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 2021 for business written in calendar year 2020 totaled \$56.5 million on written premium of \$1.4 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, companies are required to pay fees for the annual valuation process and for the certificates issued. Valuation and certification fees billed in 2021 amounted to \$537,993.

## **Special Activities**

### **Training & Professional Accomplishments**

Several Financial Examination Section staff attended virtual training sessions and webinars presented by the Society of Financial Examiners (SOFE) and the National Association of Insurance Commissioners (NAIC). 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 objective is achieved through several processes, primarily involving comprehensive and limited-scope examinations, as well as market analysis reviews of insurance companies.

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

Based on the examination results, the Division issues a report that includes observations, recommendations, and, when necessary, findings and required actions to correct company procedures that adversely affect insurance consumers or do not comply with the law. Significant findings may result in further administrative action and may lead to fines, company 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. A review of this regulatory data enables Market Conduct to understand the current state of the marketplace better and identify possible areas for regulatory intervention.

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

## **2021 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, including both 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 2021, the Market Conduct Section initiated comprehensive examinations of the following business practices of two (2) domestic companies and two (2) domestic company groups:

- 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.

Market Conduct Comprehensive Examinations initiated in 2021 included:

- The Hingham Mutual Insurance Group
- The Plymouth Rock Insurance Group
- Paul Revere Insurance Company
- Electric Insurance Company

## **Market Analysis**

In 2021, the Market Conduct Section completed analysis examinations on 95 companies for specific lines of business (homeowners, private passenger automobile, lender-placed, disability income, long-term care, individual life, and individual annuity). Examiners conducted limited scope analysis examinations on 95 companies, and 65 of the 95 received an interrogatory seeking further clarification of numerical data or additional explanatory information.

During market analysis examinations, the Division assesses data from various sources, such as the Market Conduct Annual Statement, as well as 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 examinations serve as an early warning mechanism to identify company non-compliance with insurance laws and regulations, as well as negative trends that 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 in 2021 to provide restitution to disabled Massachusetts claimants. As of December 31, 2021, over \$227,793 have been paid or reserved for payment to future claimants.

## **Monetary Fines**

In 2021, the Market Conduct Section collected \$ 43,240.00 in fines as a result of a multi-state regulatory settlement agreement.

# **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

## **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**

The Producer Licensing Unit continued its Mission of timely processing of all licensing requests, review of incoming license applications and answering questions relating to insurance licensing. The Producer Licensing Team prepared internally for the transition to the NAIC's State Based Systems. This transition required many meetings to discuss business rules that were to be implemented and the building of license types into the system. The team underwent many training sessions to ensure a smooth transition during the launch of the new system. Data was gathered and prepared for migration.

## **License Counts**

The chart below represents the license counts for 2021 for both business entities (BE) and individuals.

License Class	License Count
Individual Producer	168092

Business Entity Producer	7910
Individual Surplus Lines Broker	2628
Business Entity Surplus Lines Broker	841
Individual Reinsurance Intermediary Manager	33
Business Entity Reinsurance Intermediary Manager	20
Individual Public Insurance Adjuster	271
Business Entity Public Insurance Adjuster	66
Individual Reinsurance Intermediary Broker	217
Business Entity Reinsurance Intermediary Broker	39
Individual Life Settlement Broker	142
Business Entity Life Settlement Broker	28
Individual Consultant/Adviser	617
Business Entity Consultant/Adviser	45
Individual Damage Appraiser	4995
<b>Total Count</b>	<b>185,944</b>

## 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, in conjunction with the Policy Form Review Section, 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.

## **2021 Goals**

### *Conduct COVID-19 Actuarial Review for Private Passenger Auto (PPA)*

Collaborate with external consultants to perform actuarial reviews of PPA rates and underwriting rules, focusing on the impact of COVID-19. Complete regulatory reviews within 60–90 days of required rate filings. Expedite the review of PPA filings credits or rebates in response to pandemic-related changes in driving behavior and supply chain disruptions.

Report findings to the Commissioner and support both consumers and insurers in the post-pandemic recovery phase. Evaluate insurer responses to COVID-19 pressures, including efforts to maintain coverage flexibility for employers and individuals affected by economic hardship.

### *Continue Ongoing Monitoring of Private Passenger Auto Insurance Market Conditions*

Continue oversight of the PPA insurance market, with emphasis on rising cost and limited availability of vehicle repair parts.

Analyze the correlation between supply chain disruptions, inflation, and rate increases in filings submitted within the Commonwealth

### *Continue Monitoring Insurance Markets to Safeguard Consumers*

Monitor the implementation of FEMA's Risk Rating 2.0 and evaluate its effects on the availability of flood insurance across the Commonwealth.

Draft and publish a bulletin to safeguard homeowners who have, or suspect they have, pyrrhotite in their home foundations. Ensure that the presence or suspected presence of pyrrhotite does not result in cancellation, non-renewal, or adverse rating of homeowners insurance policies.

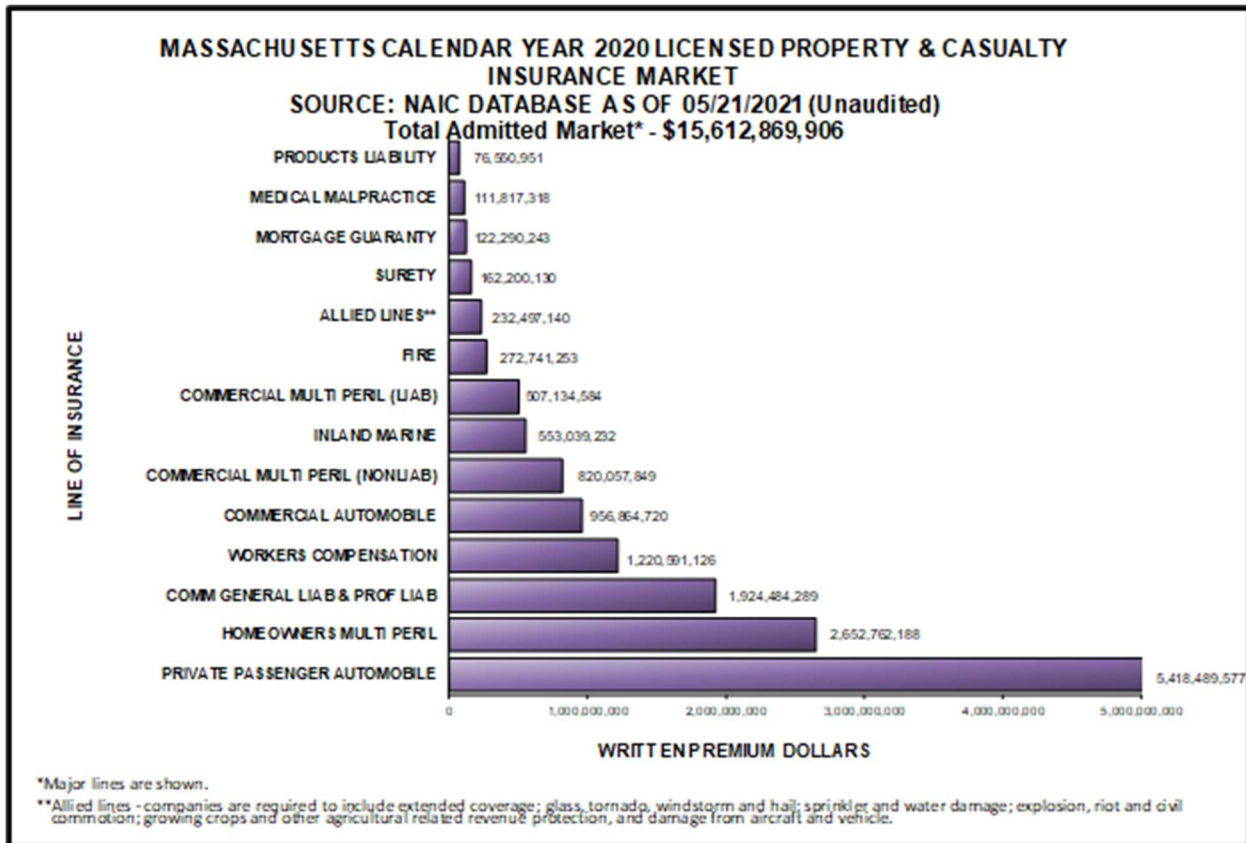
## **Primary Activities**

As the technical advisor to the Commissioner, the work of the SRB covers many different areas of the insurance marketplace. In 2021, the SRB performed reviews and analyses in the following areas of insurance:

- Private passenger automobile
- Homeowners
- Workers' compensation
- Medical malpractice

The following chart illustrates premium for the Massachusetts property and casualty market.





## Private Passenger Automobile Insurance

Private passenger automobile insurance accounted for approximately \$5.61 billion in Massachusetts written premium dollars in calendar year 2021, which is more than twice the level of premium collected for any other line of property and casualty insurance.

The SRB is responsible for:

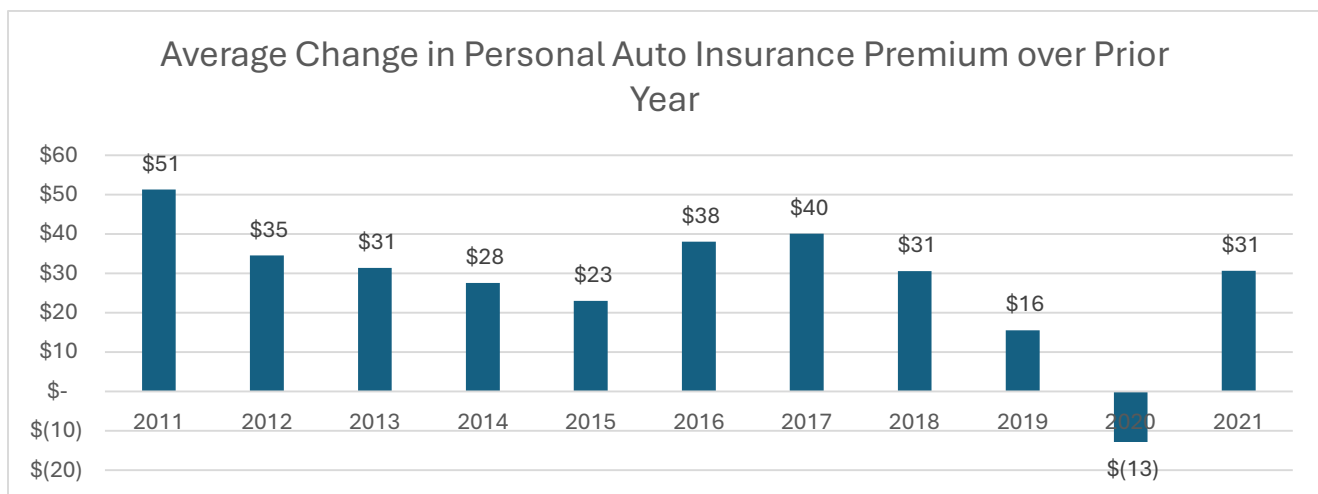
- Monitoring the activities of the residual market administered through Commonwealth Automobile Reinsurers ("CAR");
- Reviewing all company and CAR form, rule and rate filings; and
- Reviewing statistical plan filings.

## Transition to Competitive Rate Regulation

Since the move to managed competition in the private passenger automobile insurance market on April 1, 2008, 21 new insurance companies have started writing private passenger auto insurance in Massachusetts. Twelve of the 21 new companies market their products through independent agents.

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

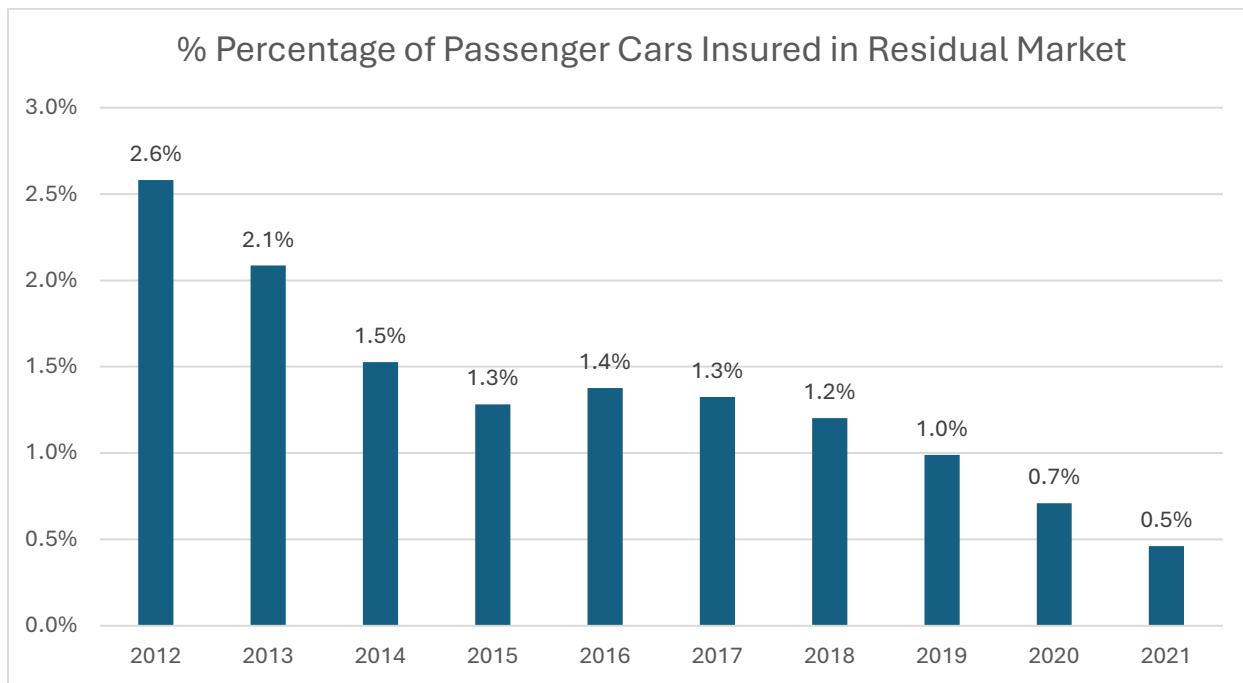
AIG PRIVATE CLIENT  
 ALLSTATE  
 AMERIPRISE (IDS)  
 BANKERS STANDARD  
 BERKLEY  
 CINCINNATI  
 ESURANCE  
 FOREMOST GRAND RAPIDS (FARMERS)  
 GEICO  
 GREEN MOUNTAIN  
 HARLEYSVILLE  
 HARTFORD (TRUMBULL)  
 MIDVALE (AMERICAN FAMILY)  
 PERMANENT GENERAL  
 PRAETORIAN  
 PREFERRED MUTUAL  
 PROGRESSIVE  
 PURE  
 SAFECO  
 VERMONT MUTUAL  
 FOREMOST P&C (FARMERS)



\* Data comes from historic NAIC auto database. The estimated 2021 average personal automobile premium per vehicle is \$219 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 0.5% by year-end 2021.



## Home 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 2021, 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 [The Commissioner's Report on Home Insurance | Mass.gov](#)

The Annual Report on Home Insurance is written in the current calendar year for the preceding year. Among the findings of the report is that of the Massachusetts home insurance market remained stable and competitive, with more people purchasing a home insurance policy and the average premium increasing only by about \$150.

## Availability of Coverage

In Massachusetts, the FAIR Plan provides coverage for home insurance when a homeowner cannot obtain coverage from licensed home insurance companies. By the end of 2020, the number covered under the FAIR Plan had decreased from a high of 201,348 policies in 2008 to 173,261 in 2020.

## 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 ("WCRIIB"), an entity licensed as a Rating Organization under M.G.L. c. 174A. The WCRIIB also acts as the Division's Statistical Agent and Pool Administrator.

The State Rating Bureau is responsible for monitoring:

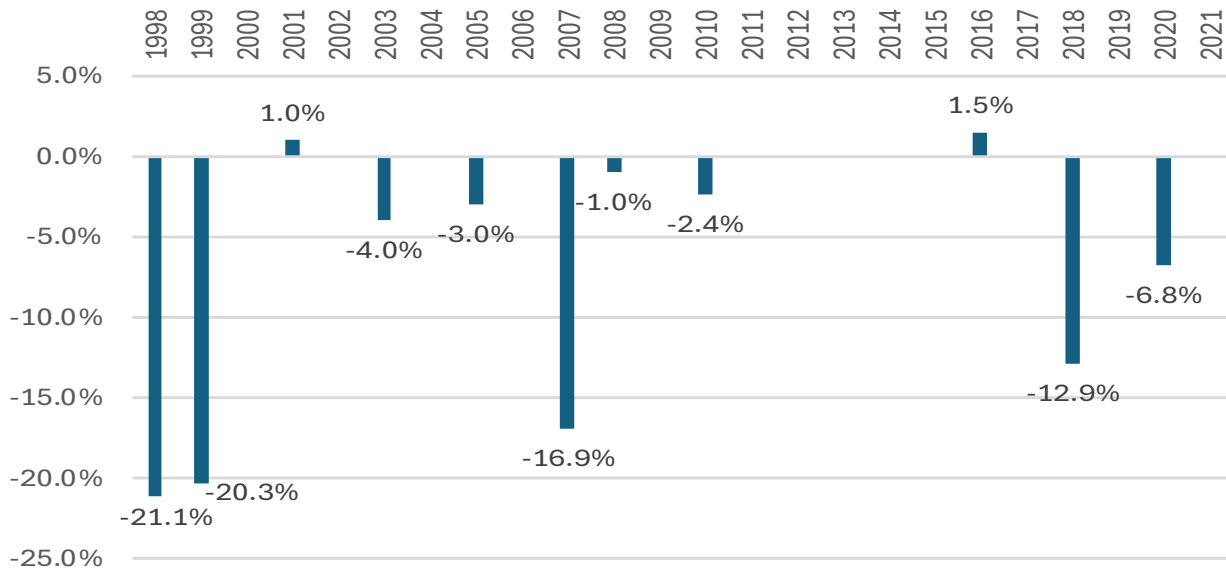
- Market-wide alterations in availability of coverage.
- The structure of the statistical plan documenting insurer loss and premium experience.
- The health and efficiency of the residual market pool.
- Industry-wide rates and rating programs for non-discrimination and actuarial appropriateness.

## Rate Review

Per M.G.L. c. 152, Section 53a, rates must be filed at least once every two years. The WCRIIBMA did not elect to make a filing for July 1, 2021 rates.

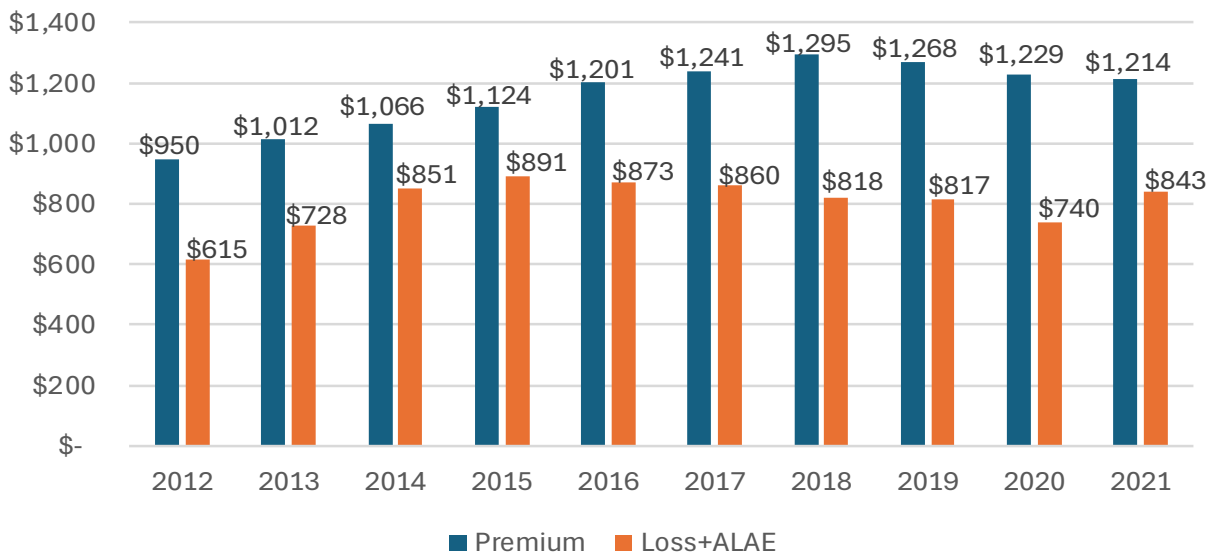
Carriers are permitted to file to apply rates that are lower than the approved rates. A total of 48 carrier groups and 12 Self-Insurance Groups were approved for downward deviations in 2021, including 14 individual companies with discounts of 25% and two SIGs offering deviations of 20%. Many companies also made individual filings of various non-standard rating plans, rules and forms.

Workers' Compensation Rate Change History: 1998 - 2021



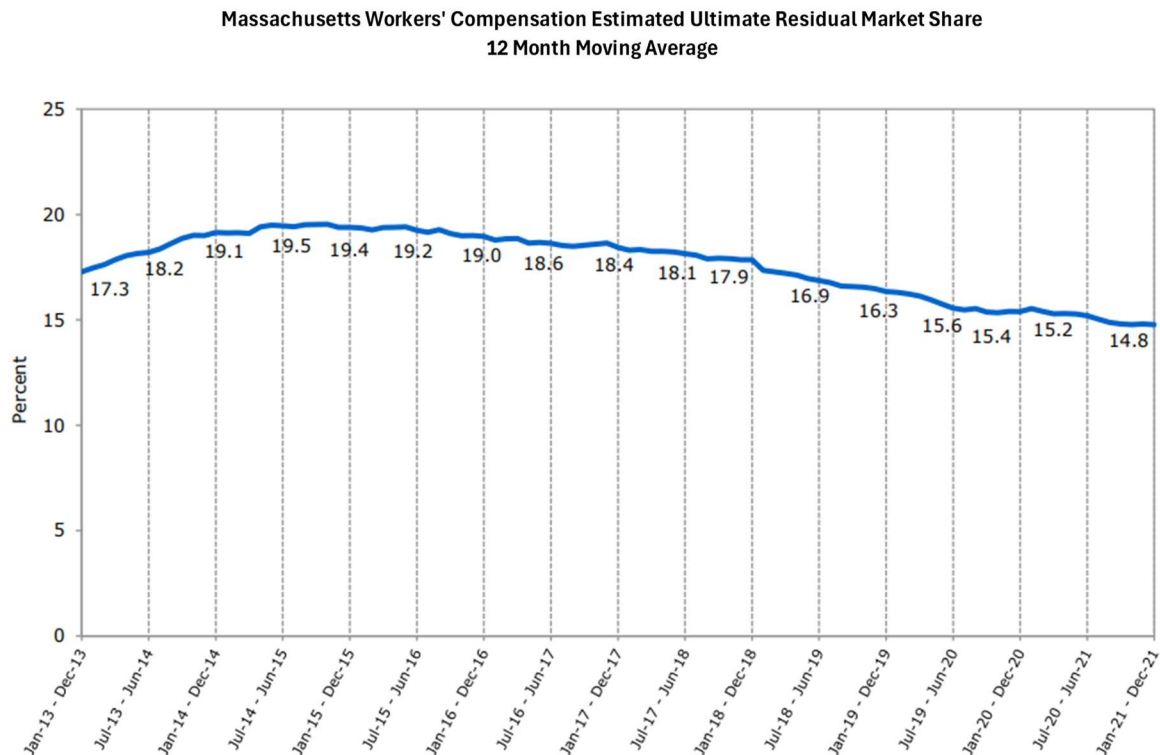
It is worth noting that the calendar year information suggests that, in spite of the many rate reductions and downward company deviations over the last two decades, workers' compensation insurance continues to have total losses that are lower than premium income.

Premium and Loss+ALAE (millions)



## 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

The state of emergency that was declared by Governor Baker on March 10, 2020, ended on June 15, 2021; nonetheless, special reporting of furlough pay as well as identification of all COVID-19 related workers' compensation claims and payments continued throughout 2021.

With regard to the COVID-19 claims data, by year-end 2021 there were twelve (12) non-zero fatal workers' compensation 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 \$366,768 of medical incurred losses and \$3,107,637 indemnity incurred losses. By year end there had been 3,121 reported non-fatal COVID-19 claims with non-zero paid losses or non-zero case reserves. These claims had \$6,104,694 incurred medical losses and \$12,210,554 incurred indemnity losses.

The WCRIBMA reported that voluntary market policy counts increased 5.7% between 2020 and 2021 compared to a 3.6% increase between 2019 and 2020. Meanwhile, the residual market policy counts fell 3.2% between 2020 to 2021 compared to a drop of 9.3% between

2019 and 2020.

## 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.

SRB staff completed the “2021 Medical Malpractice Insurance Report ” which is available in the on the Division’s website at <https://www.mass.gov/info-details/medical-malpractice-insurance>.

### Annual Medical Malpractice Report 2021 Findings

- Premium dollars written for medical malpractice coverage increased from \$340.1M in 2020 to \$353.4M in 2021.
- Proportion of coverage written in regulated market increased from 32.9% in 2020 to 33.2% in 2021.
- Proportion of coverage written in unregulated surplus lines and risk retention markets decreased from 67.1% in 2020 to 66.8% in 2021.

## Life Insurance

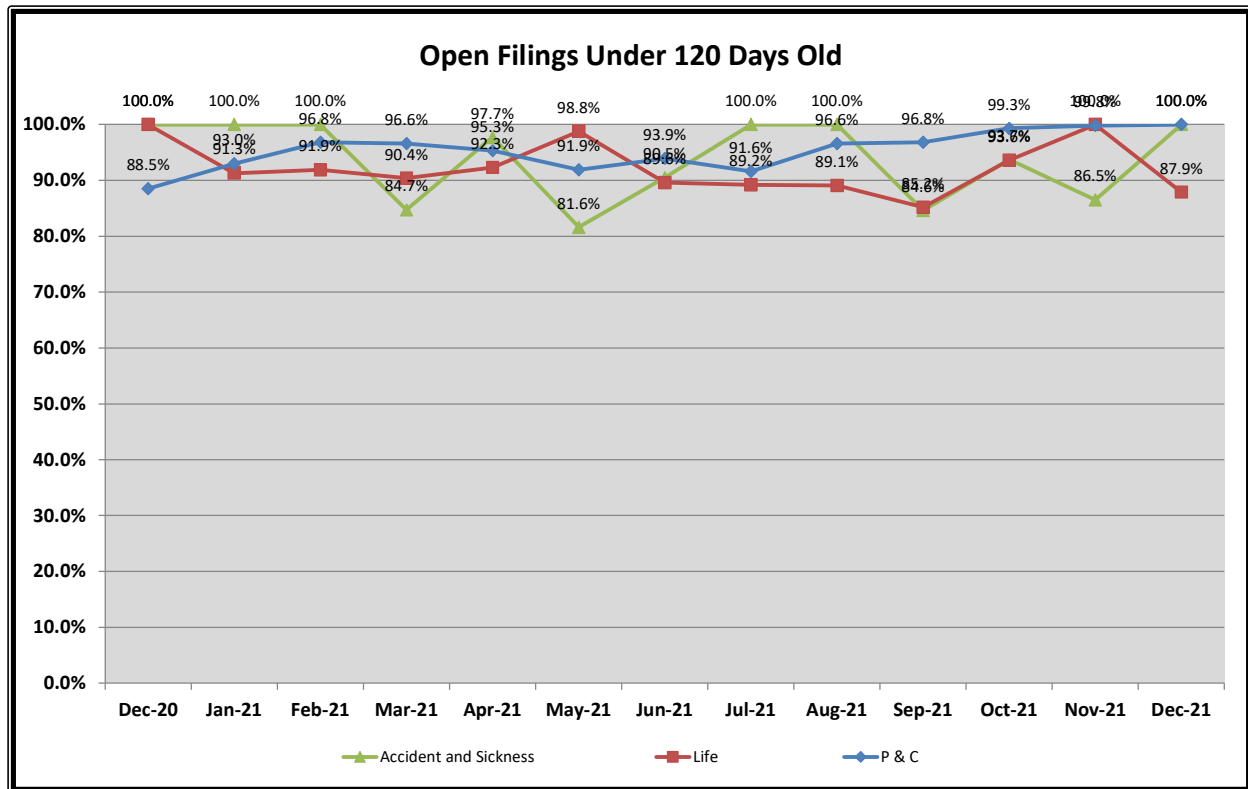
The Division did not promulgate any new life insurance regulations or issue any new life insurance bulletins during calendar year 2021.

## 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 and if needed will realign resources to minimize delays. Timely reviews support speed to market which increases consumer choice.



## Paid Family and Medical Leave Policies

Beginning January 1, 2021, M.G.L. c. 175H required 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.



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.

## **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 2021, the BMC completed the review of 558 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 2021, the Division issued a Bulletin jointly with the Department of Public Health and the Department of Mental Health to update 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

### Implementation of the Work 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 task force’s work to produce a report in 2020 and began the work necessary to develop regulation changes to 211 CMR 52.00 to implement the recommendation of the Provider Directory Task Force.

## **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 9 risk certification waiver applications as well as 36 risk certification applications to be effective between March 1, 2022 and February 28, 2023.

### **Analysis of Federal Health Market Rules**

In 2021 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 2021 the Division reviewed Massachusetts small group carriers’ filings submitted for 2nd quarter, 3rd quarter and 4th quarter 2021 rates, as well as the rates to be effective for 1st quarter 2022. 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
Q2 2021	+6.6
Q3 2021	+6.7
Q4 2021	+5.8
Q1 2022	+6.9

The Health Care Access Bureau reviewed carriers' annual merged market Medical Loss Ratio (MLR) rebate filings for the period 2018-2020 and calculated that there should be an overall rebate amount of almost \$40 million returned to policyholders in 2021.

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

Executive Order 589 created an advisory council to be chaired by the Commissioner of Insurance to “prepare a report that summarizes the status of the merged market based on an independent actuarial analysis and that makes recommendations for improved market functioning, including any policy and legislative changes that the Council recommends to ensure affordability and stability of coverage for small businesses and individuals”. The Health Care Access Bureau was charged by the Commissioner to coordinate the administrative work of the Council, the actuarial research conducted by consulting actuaries and the orderly process to consider, discuss and evaluate options during scheduled MMAC meetings. A report was produced in 2021 to discuss options that could be considered to address health care costs.

### **Administrative Simplification**

HCAB staff continued in 2021 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 2021 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
- Disability Insurance
- Medicare Supplement Products

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 continued a number of special projects in 2021 to monitor impacts of the pandemic on the health insurance marketplace and take action as necessary. Examples of projects include special examinations to understand 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 was 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.

# **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).

## **2021 Hearings and Appeals Highlights**

In 2021 a hearing was held on the rate filing submitted by the Workers' Compensation Rating and Inspection Bureau of Massachusetts for a general revision of workers' compensation insurance risks and premiums to take effect on July 1, 2022. The Division's Hearing Officers reviewed and approved a stipulation that the parties submitted to resolve the matter. Allways Health Partners appealed the Division's disapproval of its proposed

rates for health insurance for the merged market. Following initial hearings on preliminary issues, the matter was settled. Commonwealth Automobile Reinsurers 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 insurance issued through the residual market. After the required hearing, the amendments were approved.

Hearings were held on two filings seeking the Commissioner's approval of financial transactions. One addressed the acquisition of control of Coface North America Insurance Company and the other the acquisition of control of the Commonwealth Annuity and Life Insurance Company, et al. After the hearings, both transactions were approved.

Three decisions were issued in enforcement matters, two revoking producer licenses issued to two individuals and one denying a producer's appeal of a decision that revoked his license.

## 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
Closed Domestic Receiverships		

08/02/2017	Minuteman Health, Inc.	Closed 07-15-24
<b>Active Ancillary Receiverships</b>		
<b>Date Commenced</b>	<b>Company</b>	<b>State</b>
<b>Estimated Assets (market value as of 12/31/24)</b>		
None		
<b>Closed Ancillary Receiverships</b>		
None		

## Distributions to Creditors

No distributions made in 2021.

## Other Activities

### Public Record Requests

The OGC provides the Records Access Officer for the Division and supervised and assisted in responding to more than 550 public records requests and information inquiries in 2021. The OGC maintained agency compliance with the data collection requirements of the public records law and provided public records law education and training to all new employees and interns at the start of their Division employment along with refresher training for long-term employees.

### 1033 Committee Reviews

In 2021, Division attorneys and other Division staff continued to serve as the Commissioner's appointees to an advisory committee that reviews all applications for written consent to engage or participate in the business of insurance in Massachusetts under the provisions of the federal Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. § 1033 ("§ 1033 Committee") and makes recommendations to the Commissioner on the disposition of such applications. In 2021, the § 1033 Committee responded to a number of inquiries but received no applications for written consent to engage in the business of insurance.

## 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.

## **2021 Accomplishments**

- The SIU and Enforcement sections closed a total of 110 cases in calendar year 2021. Common allegations investigated in this group of cases include:
  - Licensees failing to make appropriate disclosures on license applications;
  - Licensees failing to timely disclose administrative or criminal matters to the Division; and
  - Licensee misrepresentation on insurance policy applications.
- Results among the 71 enforcement cases resolved in 2021 include the revocation of 2 individual producer licenses. There were 8 settlement agreements to cease and desist from improper conduct and/or from transacting insurance business in Massachusetts and 1 revocation order issued by a Hearing Officer.
- Opened 102 investigations and referred 17 cases from the SIU to Enforcement.
- Assessed financial penalties in the amount of \$12,350.00.

<b>2021 ENFORCEMENT NUMBERS</b>	
Financial Penalties	\$12,350
Cases Resolved	33
Enforcement Referrals	17
Cease and Desist Orders and Agreements	8
Suspended or Revoked Licenses	2

## **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 20,000 – 30,000 at-fault accident determination appeal cases and 4,000 – 6,000 appeals of RMV actions per year. In 2021, the Board received 16,831 new appeals and held 8,083 hearings. Beginning in 2020, with the onset of the COVID-19 pandemic, the Board began conducting hearings virtually. During this time the number of appeals received and heard by the Board were less than prior years due to fewer drivers being on the roadways during this period. In 2021 the vast majority of the Board's hearings were conducted virtually with a small percentage of hearings conducted administratively. In addition, the Board responds to consumer inquiries, conducts research on legal issues relative to our practices and proposes new legislation as necessary. The Board also works closely with the Office of the Attorney General to defend the decisions of the Board 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.

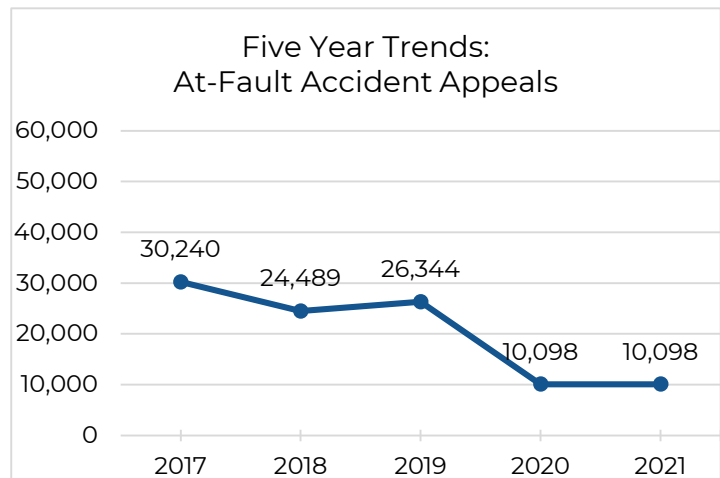
## Hearings on At-fault Accident Determinations

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. During 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 to not participate in a virtual 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

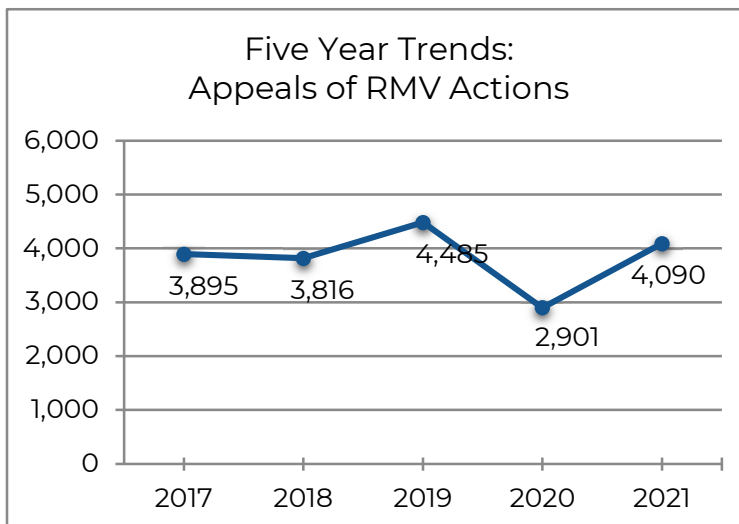


accordance with the Standards of Fault, the determination is upheld. The Board conducted and decided 8,083 hearings on appeals of at-fault accident determinations in 2021.

## **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 or modify the

Registry's decision in any way. If the board decision allows an appellant to reinstate their license or right to operate, the decision must be provided to the RMV in order to complete the reinstatement process. A favorable decision is not equivalent to an operator's license being reinstated. The Board does not review license suspensions arising from a chemical test refusal or statutory revocation pursuant to a court order. The Board received 4,090 RMV hearing appeal requests and conducted and decided 3,894 hearings on appeals from RMV decisions in 2021.



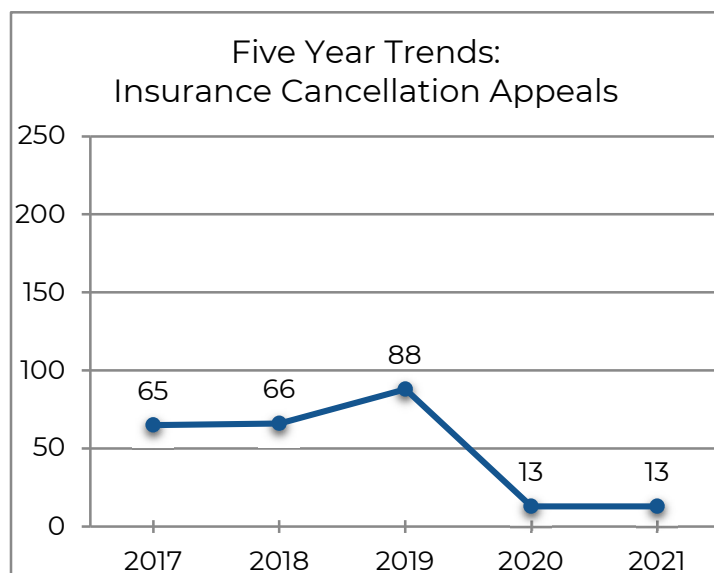
### **Breakdown of Types of RMV Appeals Heard and Decided by the Board in 2021**

Interlock Violations	317
Interlock Device	138
Operating Under the Influence	1119
4 yr. loss Habitual Traffic Offender	149
Immediate Threat	638
Drug Charge	18
30- day suspension/3 Speeding Tickets	14
60- day suspension/Driving to	255
Endanger/Recklessly	
60- day suspension/7 Surchargeable Events	73
CDL Loss	92
Complaint Fraudulent License	91
Operating After Suspension	69
Inspection Station	5
Inspector	1
Handicap Placard Refusal	28
Fatal Accident Preliminary	9

Vehicular Homicide	2
Leaving the Scene/Property damage	15
Leaving the Scene/Personal injury	8
Medical Problem	102
Student Transport 7D License	23
JOL Speeding	144
No Insurance	8
Tinted Windows	3
3 Sucharge Events	47
5 Sucharge Events	1
Dealer/repair/farm plate	2
Driving school	1
Instructor Certificate	1
School Bus	4
Refusal to Transfer Title	1
1 Year	1
<u>Other</u>	<u>515</u>
<b>TOTAL</b>	<b>3894</b>

Note: Total amount of RMV decisions rendered in 2021 will vary from total amount of RMV appeal requests received in 2021 based on appeal requests received in 2020 that were decided in 2021 or appeal requests received in 2021 that were not decided in 2021.

## Automobile Insurance Cancellation



The Board conducts hearings on complaints arising from automobile insurance cancellations. If an insurance cancellation is at issue, a complaint must be filed with the Board prior to the effective cancellation date. If the complaint is timely filed, the policy will remain in effect until the Board adjudicates the appeal and issues a 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 17 insurance cancellations appeals heard in 2021.

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.

## **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.

## **2021 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.

## **2021 Accomplishments**

- CSU staff handled approximately 5,250 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 1,700 new formal complaints and investigated and closed 1,568 cases.
- CSU resolved most complaint investigations within an average of 70 days of receiving the full complaint file.

## **Consumer Hotline**

Consumers seeking personalized assistance with insurance-related matters may contact the Consumer Service Unit (CSU) through the consumer hotline, available Monday through Friday from 8:45 a.m. to 5:00 pm. Outside of regular business hours, including weekends, consumers may leave voicemail. A representative from CSU will return the call within 24 business 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 300 formal written complaints each month in (2021 & 2022/2023). Below are the 5 top reasons for complaints, as well as the top 5 companies complained against in 2021.

### **Top 5 Reasons for Complaints in 2021 – All Complaints**

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

### **Top 5 Companies Complained Against in 2021 – 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 2021. These materials deliver information on relatively complicated insurance topics in a manner that is accessible and easily understood by consumers.

- Give your Auto Insurance Policy a Spring Tune-up
- Massachusetts Residents Encouraged to Review Homeowners Insurance Policies this National Homeownership Month
- Division of Insurance reminds Massachusetts that preparedness is key when it comes to severe storms
- Massachusetts Division of Insurance Offers Life Insurance Tips this Awareness Month
- Division of Insurance and Massachusetts Health Connector Warn Consumers to use caution when shopping for health insurance options during open enrollment

## **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 and 2021, 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 COVID19 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.

## 2021 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

## Acts — 2021

### **Chapter 260 of the Acts of 2020— An Act Promoting a Resilient Health Care System that Puts Patients First**

This Act overhauled insurance coverage for telehealth services and strengthened consumer protections. It required state-regulated carriers to provide telehealth coverage on parity with in-person services, established permanent payment parity for behavioral health, and temporary parity for chronic disease management and primary care. It also added new disclosure obligations to prevent surprise billing and updated transparency requirements in M.G.L. c. 176O. Amended M.G.L. c. 175, § 47MM and M.G.L. c. 176O, §§ 1, 2, 6, 23)

### **Chapter 24 of the Acts of 2021 - An ACT making appropriations for the fiscal year 2022 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 53-57 of the Act amended M.G.L. c. 175, § 20A to add requirements in connection with reinsurers from reciprocal jurisdictions consistent with the National Association of Insurance Commissioner's Credit for Reinsurance Model Law. Section 130 of the Act created a special commission to study auto body labor rates.

### **Chapter 29 of the Acts of 2021– An act making appropriations for fiscal year 2021 to Provide for Supplementing Certain Existing Appropriations and for Certain other Activities and projects.**

Sections 20-27 of the Act provided that commercial health insurance companies, Blue Cross and Blue Shield of Massachusetts and Health Maintenance Organizations must provide coverage for the long-term use of antibiotics to treat Lyme disease and provide coverage for prescription eye drops. Section 69 of the Act made the mandates effective July 1, 2021. Section 70 of the Act then sunsets the mandates on July 1, 2022.

## Regulations — 2021

No new or amended Division of Insurance regulations (211 CMR) were promulgated or took effect during calendar year 2021.

## Bulletins – 2021

### **Bulletin 2021-01 — Additional Guidance Regarding COVID-19 Vaccines (Issued January 21, 2021)**

Clarified that carriers must provide \$0 cost-sharing for FDA-authorized COVID-19 vaccines.

Directed carriers to cover vaccine administration without delay, prior authorization, or administrative barriers, ensuring compliance with both federal law and state mandates. Established expectations for billing, claims processing, and member communications regarding vaccine access.  
(Bulletin 2021-01)

**Bulletin 2021-02 — Special Open Enrollment Period Effective Immediately (Issued February 3, 2021)**

Established a special open enrollment period in the merged individual/small group market. Required carriers to open enrollment beyond the standard window, publicize availability, and implement streamlined enrollment procedures to facilitate access to coverage during the COVID-19 public health emergency.  
(Bulletin 2021-02; Authority: M.G.L. c. 176J)

**Bulletin 2021-03 — Updated Guidance Regarding Coverage and Reimbursement for Out-of-Network Emergency, Ambulance, and Inpatient Services During COVID-19 Health Crisis (Issued April 2, 2021)**

Reiterated coverage obligations for out-of-network emergency, ambulance, and inpatient services during the state of emergency. Required carriers to honor statutory balance-billing protections, reimburse OON services consistent with state and federal standards, and ensure members were not subject to surprise bills.  
(Bulletin 2021-03; Authority: M.G.L. c. 176O; 211 CMR 52.00)

**Bulletin 2021-04 — Managed Care Practices and Continued Access to Telehealth Services (Issued April 9, 2021)**

Directed carriers to maintain managed care and telehealth access consistent with Chapter 260. Clarified utilization management standards, expectations for continued telehealth availability, and member communication requirements.  
(Bulletin 2021-04; Authority: Chapter 260 of the Acts of 2020)

**Bulletin 2021-05 — Attachment to Guide to Health Insurance for People with Medicare (Issued April 26, 2021)**

Released an updated attachment to the consumer guide for Medicare supplement insurance. Directed carriers to distribute the guide to ensure Medicare beneficiaries had current information on coverage options and protections.  
(Bulletin 2021-05)

**Bulletin 2021-06 — Required Coverage for Treatment of PANDAS (Pediatric Autoimmune Neuropsychiatric Disorders Associated with Streptococcal Infections) and PANS (Pediatric Acute-Onset Neuropsychiatric Syndrome) (Issued April 27, 2021)**

Reiterated statutory requirements for coverage of treatment of PANDAS/PANS. Directed carriers to provide medically necessary coverage, clarified benefit scope, and ensured parity with other mandated behavioral health services.  
(Bulletin 2021-06; Authority: M.G.L. c. 175, § 47GG)

**Bulletin 2021-07 — Updated Protocols for Prevention of Emergency Department Boarding of Patients with Acute Behavioral Health and/or Substance Use Disorder Emergencies under Expedited Psychiatric Inpatient Admission Protocols (“EPIA”)**

**(Issued June 28, 2021)**

Updated protocols for expedited psychiatric inpatient admissions (EPIA). Required carriers to coordinate with providers and ensure timely placement to reduce emergency department boarding for patients with acute behavioral health needs.  
(Bulletin 2021-07)

**Bulletin 2021-08 — Responding to COVID-19 Risks Following End of State of Emergency (Issued August 31, 2021)**

Addressed carrier obligations following the end of the state COVID-19 emergency. Directed carriers to maintain reasonable accommodations for appeals, prior authorization, continuity of care, and transition support for members.  
(Bulletin 2021-08)

**Bulletin 2021-09 — HIV PrEP Preventive Health Service Coverage (Issued September 7, 2021)**

Confirmed coverage of HIV PrEP as a preventive health service. Required carriers to include PrEP, related visits, and labs as mandated preventive care without cost-sharing, consistent with state and federal preventive service mandates.  
(Bulletin 2021-09; Authority: M.G.L. c. 175, § 47BB; c. 176A, § 8DD; c. 176B, § 4DD; c. 176G, § 4DD)

**Bulletin 2021-10 — Continued Access to Telehealth Services in 2021 (Issued September 7, 2021)**

Implemented Chapter 260 telehealth provisions. Required carriers to provide parity for behavioral health telehealth, temporary parity for primary care and chronic disease management, and coverage of certain audio-only visits.  
(Bulletin 2021-10; Authority: Chapter 260 of the Acts of 2020; M.G.L. c. 175, § 47MM)

**Bulletin 2021-11 — Prohibited Discrimination on the Basis of Gender Identity or Gender Dysphoria Including Medically Necessary Gender Affirming Care and Related Services (Issued September 9, 2021)**

Reaffirmed nondiscrimination protections under state law. Directed carriers to provide medically necessary gender-affirming care, prohibited categorical exclusions, and aligned coverage with statutory requirements.  
(Bulletin 2021-11; Authority: M.G.L. c. 176D; M.G.L. c. 151B)

**Bulletin 2021-12 — Crumbling Foundations Due to High Concentrations of Pyrrhotite in Home Construction (Issued October 6, 2021)**

Addressed coverage for damage caused by crumbling foundations with pyrrhotite. Directed property and casualty insurers to fairly investigate claims, avoid unfair settlement practices, and assist affected consumers consistent with M.G.L. c. 176D.  
(Bulletin 2021-12; Authority: M.G.L. c. 176D)

**Bulletin 2021-13 — Use of Electronic Transactions and Communications When Making Certain Regulatory Filings (Issued October 6, 2021)**

Required electronic submission of specified regulatory filings, including financial filings, holding company forms, and licensing documents. Standardized procedures and identified DOI contact points for compliance.

(Bulletin 2021-13)

**Bulletin 2021-14 — Guidance Regarding Open Enrollment Period for Benefit Year 2022 (Issued October 15, 2021)**

Set standards for the 2022 open enrollment period. Directed carriers to ensure adequate consumer outreach, timely enrollment processing, and compliance with statutory requirements for marketing and communications.

(Bulletin 2021-14; Authority: M.G.L. c. 176J)

**Bulletin 2021-15 — Relaxation of Prior Authorization and Credentialing Procedures in Response to Health Facility Staffing and Capacity Constraints (Issued November 17, 2021)**

Relaxed certain prior authorization and credentialing rules during healthcare staffing shortages. Required carriers to implement temporary measures, facilitate access to care, and report compliance to the Division of Insurance.

(Bulletin 2021-15)

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

## Property & Casualty Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2021	Total Premium Written 2021	Total Net Assets as of 12/31/2021	Total Liabilities as of 12/31/2021	Total Surplus as of 12/31/2021
10017	ARBELLA IND INS CO	\$28,771,562	\$30,287,451	\$65,459,131	\$41,292,168	\$24,166,964
10206	MEDICAL PROFESSIONAL MUT INS CO	68,122,764	68,122,764	3,943,535,417	2,311,142,618	1,632,392,799
10394	PLYMOUTH ROCK HOME ASSUR CORP	42,461,866	74,988,188	171,414,029	82,332,240	89,081,789
10664	ENDEAVOUR INS CO	2,825,224	2,825,224	6,779,064	9,353	6,769,711
11104	ASSOCIATED EMPLOYERS INS CO	37,002,582	40,149,951	6,805,805	482,752	6,323,053
11984	INDEPENDENCE CAS INS CO	19,468,299	19,468,299	5,056,238	5,896	5,050,342
12154	ENCOMPASS INS CO OF MA	(3,646)	(3,646)	5,843,896	29,779	5,814,117
12725	NEW ENGLAND MUT INS CO	7,548,696	9,897,754	49,196,476	3,137,995	46,058,481
12808	SAFETY PROP & CAS INS CO	25,867,557	26,695,176	57,249,144	27,357,035	29,892,108
12886	MASSACHUSETTS EMPLOYERS INS CO	11,921,539	11,921,539	4,722,874	778,667	3,944,207
13163	HOSPITALITY MUT INS CO	5,278,278	5,278,278	55,222,282	35,055,825	20,166,457
13374	ARROW MUT LIAB INS CO	4,949,544	5,194,172	44,713,299	13,899,061	30,814,238
13463	BARNSTABLE CNTY MUT INS CO	27,928,940	27,928,940	139,190,054	32,517,590	106,672,464
13643	BUNKER HILL INS CAS CO	13,920,908	13,920,908	45,327,179	27,289,839	18,037,340
13706	DORCHESTER MUT INS CO	43,540,864	43,734,550	121,792,986	57,390,969	64,402,017
13943	FITCHBURG MUT INS CO	1,220	33,636,613	172,124,227	80,718,055	91,406,172
14192	HINGHAM MUT FIRE INS CO	9,663,513	9,663,513	78,631,393	30,980,319	47,651,074
14486	LIBERTY MUT MID ATLANTIC INS CO	-	214,098,014	24,277,181	1,995,825	22,281,356
14613	MONTGOMERY MUT INS CO	990,348	126,266,797	57,436,481	420,306	57,016,175
14737	PLYMOUTH ROCK ASSUR CORP	372,708,665	407,484,651	1,140,560,973	602,653,294	537,907,679
15067	QUINCY MUT FIRE INS CO	165,725,579	224,512,429	2,208,896,726	718,317,856	1,490,578,870
16035	BUNKER HILL PREFERRED INS CO	19,844,919	19,844,919	46,464,079	28,739,137	17,724,942
16036	BUNKER HILL PROP INS CO	14,296,845	14,296,845	44,774,445	27,111,864	17,662,581
16037	BUNKER HILL INS CO	17,831,258	17,831,258	45,758,556	28,061,623	17,696,933
16893	SAFETY NORTHEAST INS CO	-	-	38,327,135	27,028,658	11,298,477
17000	ARBELLA MUT INS CO	563,161,918	563,161,918	1,820,855,516	890,464,392	930,391,124
19763	BAY STATE INS CO	79,712,081	110,172,371	838,876,647	292,692,209	546,184,436
19771	CAMBRIDGE MUT FIRE INS CO	28,701,802	161,730,960	1,361,736,429	578,602,479	783,133,949
19798	MERRIMACK MUT FIRE INS CO	146,433,435	391,486,071	2,318,576,735	826,719,839	1,491,856,898
21261	ELECTRIC INS CO	21,993,475	229,571,070	1,035,213,869	661,435,857	373,778,012

21750	PILGRIM INS CO	61,919,178	61,919,178	140,498,374	90,056,027	50,442,347
23043	LIBERTY MUT INS CO	303,423,969	2,857,638,128	65,530,745,401	43,481,129,334	22,049,616,067
23965	NORFOLK & DEDHAM MUT FIRE INS CO	187,573,563	199,030,025	552,594,169	261,452,874	291,141,295
31887	COFACE N AMER INS CO	3,051,363	128,194,638	176,623,332	110,088,650	66,534,682
33618	SAFETY IND INS CO	163,965,136	172,996,251	173,194,071	83,908,996	89,285,075
33758	ASSOCIATED INDUSTRIES OF MA MUT INS	82,291,143	102,103,661	776,385,644	419,730,215	356,655,429
34754	COMMERCE INS CO	1,382,555,188	1,406,886,987	2,065,797,205	1,381,520,303	684,276,902
37346	DANBURY INS CO	8,386,367	8,386,367	17,501,972	9,931,534	7,570,438
39454	SAFETY INS CO	575,174,189	602,447,622	1,709,803,225	882,824,527	826,978,698
39454	SAFETY INS CO	575,174,189	602,447,622	1,709,803,225	882,824,527	826,978,698
40274	CITATION INS CO	238,267,941	238,267,941	202,165,511	141,517,643	60,647,868
41360	ARBELLA PROTECTION INS CO	218,132,437	266,828,193	392,981,685	251,571,456	141,410,229
41955	BARNSTABLE CNTY INS CO	4,625,745	4,625,745	31,313,095	4,040,191	27,272,904
44326	ATLANTIC CHARTER INS CO	31,638,576	39,776,904	163,784,368	94,821,181	68,963,187
<b>TOTAL</b>		<b>\$5,041,674,830</b>	<b>\$8,993,268,617</b>	<b>\$87,888,206,318</b>	<b>\$54,641,256,431</b>	<b>\$33,246,949,886</b>

## Life Insurance Companies

NAIC #	Company Name	Total Premium Written in MA 2021	Total Premium Written 2021	Total Net Assets as of 12/31/2021	Total Liabilities as of 12/31/2021	Total Surplus as of 12/31/2021
61476	BOSTON MUT LIFE INS CO	\$44,537,790	\$211,011,633	\$1,633,959,318	\$1,349,805,088	\$284,154,230
65935	MASSACHUSETTS MUT LIFE INS CO	1,823,619,747	30,793,479,586	314,967,246,427	287,987,990,435	26,979,255,992
66265	MONARCH LIFE INS CO	198,347	5,994,304	627,768,168	621,890,151	5,878,016
67598	PAUL REVERE LIFE INS CO	4,166,257	177,986,278	745,407,679	475,372,442	270,035,236
69140	FIRST ALLMERICA FIN LIFE INS CO	544,060	52,940,326	3,262,611,927	3,141,110,617	121,501,310
70435	THE SAVINGS BANK MUT LIFE INS CO OF	141,829,078	362,066,547	3,563,518,892	3,356,931,055	206,587,837
71714	BERKSHIRE LIFE INS CO OF AMER	27,559,311	679,432,528	4,680,799,785	4,459,917,142	220,882,643
74920	REGAL REINS CO	-	-	8,135,484	68,966	8,066,518
80896	CENTRE LIFE INS CO	456,756	11,816,542	1,450,191,917	1,366,964,717	83,227,200
84824	COMMONWEALTH ANN & LIFE INS CO	3,519,877	75,112,831	60,138,154,291	56,249,997,500	3,888,156,791
91626	NEW ENGLAND LIFE INS CO	12,947,652	156,989,916	9,856,907,299	9,718,163,534	138,743,765
93610	JOHN HANCOCK LIFE & HLTH INS CO	2,139,304	717,139,876	19,441,075,660	17,992,713,522	1,448,362,138
<b>TOTAL</b>		<b>\$2,061,518,179</b>	<b>\$33,243,970,367</b>	<b>\$420,375,776,847</b>	<b>\$386,720,925,169</b>	<b>\$33,654,851,676</b>

## Health Insurance Companies

NAIC #	Company Name	Total Premium	Total Premium	Total Net Assets as	Total Liabilities as	Total Surplus as of
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		Written in MA 2021	Written 2021	of 12/31/2021	of 12/31/2021	12/31/2021
11109	ALLWAYS HLTH PARTNERS INC	\$868,839,865	\$868,839,865	\$327,017,943	\$175,043,007	\$151,974,939
12210	DENTEGRA INS CO OF NEW ENGLAND	3,491,379	3,491,653	6,730,798	534,094	6,196,704
12219	BCBS OF MA HMO BLUE INC	5,261,000,712	5,261,000,712	3,100,726,716	997,615,235	2,103,111,481
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	2,417,062,124	2,936,907,640	1,039,051,210	524,398,549	514,652,661
14131	TUFTS HLTH PUBLIC PLANS INC	2,623,513,442	2,713,081,875	1,008,368,319	607,602,026	400,766,295
14198	HNE INS CO	5,947,268	5,947,268	5,670,236	1,620,963	4,049,273
15497	DSM MA INS CO INC	27,391,173	27,391,173	11,489,257	2,331,561	9,157,697
16375	ALLWAYS HEALTH PARTNERS INS CO	21,613,387	21,613,387	54,170,273	50,183,334	3,986,939
16703	ALWAYS HLTH PARTNERS SELECT LLC	-	-	1,136,197	60	1,136,137
16970	WELLCARE HLTH PLANS OF MA INC	-	-	6,124,837	142,506	5,982,331
16986	COMMONWEALTH CARE ALLIANCE MA LLC	-	-	4,163,340	873,829	3,289,512
17015	CENTRAL MASS HLTH LLC	-	-	9,323,513	3,294,466	6,029,047
17018	ETERNALHEALTH INC	-	-	14,965,535	8,913,300	6,052,235
18975	HPHC INS CO INC	359,111,453	646,439,835	311,319,077	168,889,971	142,429,105
52060	DENTAL SERV OF MA INC	240,683,806	240,683,806	126,618,348	82,375,464	44,242,883
53228	BCBS OF MA	3,153,218,674	3,153,218,674	2,727,485,659	1,846,071,490	881,414,169
60117	TUFTS INS CO INC	322,952,252	350,225,375	140,046,171	63,207,764	76,838,407
66828	FALLON HLTH & LIFE ASSUR CO	17,998,933	17,998,933	23,522,583	8,208,365	15,314,218
95299	CONNECTICARE OF MA INC	1,340,820	1,340,820	4,801,915	305,213	4,496,702
95541	FALLON COMM HLTH PLAN INC	1,765,291,459	1,765,291,459	688,258,426	410,025,356	278,233,072
95673	HEALTH NEW ENGLAND INC	848,723,237	855,597,129	263,944,212	171,034,362	92,909,850
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	2,745,758,874	2,775,868,060	1,424,293,878	571,612,202	852,681,676
96717	HARVARD PILGRIM HEALTH CARE NEW ENG	11,457,580	548,925,033	168,348,324	105,542,444	62,805,880
96911	HARVARD PILGRIM HLTH CARE INC	1,350,776,003	1,837,284,985	1,204,313,484	493,324,993	710,988,491
<b>TOTAL</b>		<b>\$22,046,172,441</b>	<b>\$24,031,147,682</b>	<b>\$12,671,890,251</b>	<b>\$6,293,150,554</b>	<b>\$6,378,739,704</b>

## Fraternal Organizations

NAIC #	Company Name	Total Premium Written in MA 2021	Total Premium Written 2021	Total Net Assets as of 12/31/2021	Total Liabilities as of 12/31/2021	Total Surplus as of 12/31/2021
58130	CATHOLIC ASSN OF FORESTERS	\$90,986	\$106,455	\$8,517,017	\$6,956,668	1,560,349
58181	SUPREME COUNCIL THE ROYAL ARCANUM	792,700	5,782,095	107,929,070	96,254,729	11,674,341
<b>TOTAL</b>		<b>\$883,686</b>	<b>\$5,888,550</b>	<b>\$116,446,087</b>	<b>\$103,211,397</b>	<b>\$13,234,690</b>



## Workers' Compensation Self-Insured Groups

Company Name	Gross Premium Written in MA 2021	Total Premium Written 2021	Total Net Assets as of 12/31/2021	Total Liabilities as of 12/31/2021	Total Surplus as of 12/31/2021
(ASSOCIATED BUILDERS & CONTRACTORS) ABC MASSACHUSETTS WORKERS' COMPENSATION SELF INSURANCE GROUP, INC.	\$2,998,675	\$2,371,606	\$5,636,084	\$5,636,084	\$0
AUTOMOTIVE INDUSTRIES COMPENSATION CORP.	6,340,106	5,809,069	8,620,921	8,620,921	0
COMMONWEALTH MANUFACTURERS COMPENSATION CORPORATION (RUNOFF SINCE 1/1/1996)					
INDEPENDENT SCHOOLS COMPENSATION CORPORATION	9,176,132	8,810,146	26,372,930	26,372,930	0
MANUFACTURERS OF MASSACHUSETTS COMPENSATION GROUP (RUNOFF SINCE 1/1/2012)	-	-	1,164,606	1,169,274	(4,668)
MASSACHUSETTS BAY SELF-INSURANCE GROUP, INC.	2,326,604	2,071,287	6,778,626	4,618,627	2,159,999
MASSACHUSETTS CARE SELF-INSURANCE GROUP, INC.	5,860,600	5,456,638	7,582,971	7,582,971	0
MASSACHUSETTS CATHOLIC SELF-INSURANCE GROUP, INC. Y/E 3/31/2021	3,859,454	3,586,461	14,910,232	7,038,016	7,872,216
MASSACHUSETTS EDUCATION & GOVERNMENT ASSOCIATION P & C GROUP Y/E 6/30/2021	16,284,505	15,427,876	38,847,700	25,766,688	13,081,012
MASSACHUSETTS HEALTHCARE SELF-INSURANCE GROUP, INC.	5,803,978	5,064,008	7,963,341	7,963,341	0
MASSACHUSETTS HIGH TECHNOLOGY SELF-INSURANCE GROUP (RUNOFF SINCE 1/1/2020)	-	-	1,062,980	1,062,980	0
(MASSACHUSETTS INTERLOCAL INSURANCE ASSOCIATION) MIIA P & C GROUP, INC. Y/E 6/30/21	97,482,602	72,423,185	307,815,374	141,034,670	166,780,704
MASSACHUSETTS MANUFACTURING SELF-INSURANCE GROUP, INC.	3,752,159	3,389,111	6,446,666	6,346,666	100,000
MASSACHUSETTS MCDONALD'S OPERATORS WORKERS' COMPENSATION GROUP, INC.	1,716,622	1,548,152	4,147,549	4,147,549	0
MASSACHUSETTS (NATIONAL ASSOCIATION OF HOUSING & REDEVELOPMENT OFFICIALS) NAHRO INSURANCE GROUP, INC.	4,686,926	3,907,599	9,955,883	9,608,454	347,428
MASSACHUSETTS RETAIL MERCHANTS WORKERS' COMP. SELF-INSURANCE GROUP, INC.	20,938,076	19,231,875	35,293,930	35,293,930	0
MASSACHUSETTS TRADE SELF-INSURANCE GROUP, INC.	8,684,440	7,755,784	9,551,238	9,551,238	0
(NEW ENGLAND EDUCATORS INSURANCE ASSOCIATION) NEEIA COMPENSATION, INC.	7,264,936	6,958,650	24,123,392	24,123,392	0
"(SCHOOL TRANSPORTATION ASSOCIATION OF MASSACHUSETTS) STAM WORKERS'	3,342,743	3,020,119	5,933,933	5,933,933	0

COMPENSATION SELF INSURANCE GROUP, INC."					
SELF- INSURED LUMBER BUSINESSES ASSN, INC.	4,025,597	3,610,717	6,918,513	6,876,546	41,967
WHOLESALE/RETAIL SUPPLIERS COMPENSATION CORPORATION (RUNOFF SINCE 1/1/2010)	There is no administrator to prepare annual statement. Legal is aware.				
<b>TOTAL</b>	<b>\$204,544,155</b>	<b>\$170,442,283</b>	<b>\$529,126,869</b>	<b>\$338,748,210</b>	<b>\$190,378,658</b>

## 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	1,513,406,747	33.36%
60054	AETNA LIFE INS CO	CT	546,012,553	12.04%
67369	CIGNA HLTH & LIFE INS CO	CT	391,722,564	8.64%
65978	METROPOLITAN LIFE INS CO	NY	248,769,541	5.48%
62235	UNUM LIFE INS CO OF AMER	ME	161,125,338	3.55%
80802	US BR SUN LIFE ASSUR CO OF CANADA	MI	132,258,358	2.92%
64246	GUARDIAN LIFE INS CO OF AMER	NY	128,820,105	2.84%
65676	LINCOLN NATL LIFE INS CO	IN	117,707,420	2.59%
70815	HARTFORD LIFE & ACCIDENT INS CO	CT	88,887,161	1.96%
70025	GENWORTH LIFE INS CO	DE	69,816,253	1.54%
68241	PRUDENTIAL INS CO OF AMER	NJ	64,462,912	1.42%
68381	RELIANCE STANDARD LIFE INS CO	IL	63,511,009	1.40%
65838	JOHN HANCOCK LIFE INS CO USA	MI	54,319,253	1.20%
60380	AMERICAN FAMILY LIFE ASSUR CO OF COL	NE	51,716,740	1.14%
61271	PRINCIPAL LIFE INS CO	IA	51,006,462	1.12%
71870	FIDELITY SECURITY LIFE INS CO	MO	46,226,086	1.02%
62049	COLONIAL LIFE & ACCIDENT INS CO	SC	43,945,970	0.97%
65498	LIFE INS CO OF N AMER	PA	42,372,592	0.93%
69019	STANDARD INS CO	OR	41,089,692	0.91%
67105	RELIASTAR LIFE INS CO	MN	38,459,912	0.85%

Total Companies Writing in MA	222
Top 20 Companies	\$3,895,636,668
Direct Written Premium	85.9%

Remaining Companies	\$640,687,687
Direct Written Premium	14.1%
Total Direct Written Premium	\$4,536,324,355

## Aircraft (All Perils)

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
38318	STARR IND & LIAB CO	TX	8,577,321	22.69%
37885	XL SPECIALTY INS CO	DE	6,772,667	17.91%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	3,494,366	9.24%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	3,356,388	8.88%
20052	NATIONAL LIAB & FIRE INS CO	CT	2,142,638	5.67%
22667	ACE AMER INS CO	PA	2,142,630	5.67%
19720	AMERICAN ALT INS CORP	DE	1,979,376	5.24%
24147	OLD REPUBLIC INS CO	PA	1,954,995	5.17%
10641	ENDURANCE AMER INS CO	DE	1,873,736	4.96%
16691	GREAT AMER INS CO	OH	1,141,608	3.02%
34274	CENTRAL STATES IND CO OF OMAHA	NE	577,669	1.53%
39217	QBE INS CORP	PA	524,120	1.39%
26433	HARCO NATL INS CO	IL	459,402	1.22%
10367	AVEMCO INS CO	MD	385,374	1.02%
13604	STARR SURPLUS LINES INS CO	TX	363,667	0.96%
10030	WESTCHESTER FIRE INS CO	PA	360,909	0.95%
34037	HALLMARK INS CO	AZ	354,465	0.94%
19941	AMERICAN COMMERCE INS CO	OH	341,739	0.90%
25496	STARSTONE NATL INS CO	DE	336,407	0.89%
10945	TOKIO MARINE AMER INS CO	NY	314,780	0.83%

Total Companies Writing in MA	25
Top 20 Companies	\$37,454,257
Direct Written Premium	99.1%
Remaining Companies	\$355,630
Direct Written Premium	0.9%
Total Direct Written Premium	\$37,809,887

## Annuities

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	566,635,206	6.38%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	517,231,963	5.82%
65676	LINCOLN NATL LIFE INS CO	IN	516,857,416	5.82%
65056	JACKSON NATL LIFE INS CO	MI	511,625,439	5.76%
86509	VOYA RETIREMENT INS & ANN CO	CT	465,622,114	5.24%
91596	NEW YORK LIFE INS & ANN CORP	DE	442,264,937	4.98%
62944	EQUITABLE FINANCIAL LIFE INS CO	NY	415,950,539	4.68%
68241	PRUDENTIAL INS CO OF AMER	NJ	393,961,486	4.43%
66869	NATIONWIDE LIFE INS CO	OH	351,158,918	3.95%
61689	ATHENE ANN & LIFE CO	IA	295,295,828	3.32%
60488	AMERICAN GEN LIFE INS CO	TX	276,700,769	3.11%
90611	ALLIANZ LIFE INS CO OF N AMER	MN	261,714,715	2.94%
68675	SECURITY BENEFIT LIFE INS CO	KS	230,770,610	2.60%
65005	RIVERSOURCE LIFE INS CO	MN	206,164,202	2.32%
92657	NATIONWIDE LIFE & ANN INS CO	OH	196,761,567	2.21%
87726	BRIGHTHOUSE LIFE INS CO	DE	191,156,741	2.15%
91642	FORETHOUGHT LIFE INS CO	IN	187,399,845	2.11%
92622	WESTERN SOUTHERN LIFE ASSUR CO	OH	184,993,789	2.08%
93696	FIDELITY INVESTMENTS LIFE INS CO	UT	168,280,957	1.89%
67466	PACIFIC LIFE INS CO	NE	160,985,739	1.81%

Total Companies Writing in MA	180
Top 20 Companies	\$6,541,532,780
Direct Written Premium	73.6%
Remaining Companies	\$2,346,194,214
Direct Written Premium	26.4%
Total Direct Written Premium	\$8,887,726,994

## Boiler & Machinery

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
21482	FACTORY MUT INS CO	RI	15,158,735	34.74%

20281	FEDERAL INS CO	IN	3,516,223	8.06%
25674	TRAVELERS PROP CAS CO OF AMER	CT	2,202,589	5.05%
16535	ZURICH AMER INS CO	NY	2,039,940	4.68%
11452	HARTFORD STEAM BOIL INSPEC & INS CO	CT	1,584,189	3.63%
10014	AFFILIATED FM INS CO	RI	1,301,780	2.98%
21458	EMPLOYERS INS CO OF WAUSAU	WI	1,094,653	2.51%
25658	TRAVELERS IND CO	CT	1,078,815	2.47%
26247	AMERICAN GUAR & LIAB INS	NY	1,000,005	2.29%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	949,884	2.18%
20443	CONTINENTAL CAS CO	IL	822,106	1.88%
43001	NARRAGANSETT BAY INS CO	RI	817,841	1.87%
20303	GREAT NORTHERN INS CO	IN	796,611	1.83%
24554	XL INS AMER INC	DE	767,871	1.76%
19259	SELECTIVE INS CO OF SC	IN	609,066	1.40%
23035	LIBERTY MUT FIRE INS CO	WI	525,586	1.20%
20508	VALLEY FORGE INS CO	PA	509,369	1.17%
31325	ACADIA INS CO	IA	479,754	1.10%
25844	UNION INS CO	IA	460,757	1.06%
20397	VIGILANT INS CO	NY	459,040	1.05%

Total Companies Writing in MA	113
Top 20 Companies	\$36,174,814
Direct Written Premium	82.9%
Remaining Companies	\$7,454,729
Direct Written Premium	17.1%
Total Direct Written Premium	\$43,629,543

## **Burglary & Theft**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	2,185,603	23.13%
20281	FEDERAL INS CO	IN	1,344,936	14.23%
10200	HISCOX INS CO INC	IL	955,092	10.11%
37885	XL SPECIALTY INS CO	DE	948,815	10.04%
20443	CONTINENTAL CAS CO	IL	909,515	9.63%
16535	ZURICH AMER INS CO	NY	657,354	6.96%
22292	HANOVER INS CO	NH	477,872	5.06%

19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	275,853	2.92%
29599	US SPECIALTY INS CO	TX	249,393	2.64%
29459	TWIN CITY FIRE INS CO	IN	194,737	2.06%
32603	BERKLEY INS CO	DE	157,482	1.67%
18058	PHILADELPHIA IND INS CO	PA	108,911	1.15%
10677	THE CINCINNATI INS CO	OH	106,171	1.12%
10120	EVEREST NATL INS CO	DE	90,700	0.96%
27154	ATLANTIC SPECIALTY INS CO	NY	77,510	0.82%
19682	HARTFORD FIRE INS CO	CT	76,625	0.81%
20346	PACIFIC IND CO	WI	53,840	0.57%
22667	ACE AMER INS CO	PA	39,856	0.42%
11150	ARCH INS CO	MO	37,159	0.39%
10052	CHUBB NATL INS CO	IN	36,375	0.38%

Total Companies Writing in MA	102
Top 20 Companies	\$8,983,799
Direct Written Premium	95.1%
Remaining Companies	\$465,210
Direct Written Premium	4.9%
Total Direct Written Premium	\$9,449,009

## Commercial Auto

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	137,211,561	12.88%
41360	ARBELLA PROTECTION INS CO	MA	102,429,756	9.62%
39454	SAFETY INS CO	MA	72,346,332	6.79%
21750	PILGRIM INS CO	MA	52,214,148	4.90%
33618	SAFETY IND INS CO	MA	45,232,576	4.25%
24260	PROGRESSIVE CAS INS CO	OH	42,942,763	4.03%
18058	PHILADELPHIA IND INS CO	PA	36,460,818	3.42%
16535	ZURICH AMER INS CO	NY	25,817,928	2.42%
41840	ALLMERICA FIN BENEFIT INS CO	MI	23,991,292	2.25%
19046	TRAVELERS CAS INS CO OF AMER	CT	21,744,962	2.04%
31325	ACADIA INS CO	IA	18,949,883	1.78%
24147	OLD REPUBLIC INS CO	PA	18,603,944	1.75%
11770	UNITED FINANCIAL CAS CO	OH	17,432,256	1.64%

10243	NATIONAL CONTINENTAL INS CO	NY	15,311,503	1.44%
14788	NGM INS CO	FL	15,079,282	1.42%
25658	TRAVELERS IND CO	CT	14,824,659	1.39%
25615	CHARTER OAK FIRE INS CO	CT	14,643,143	1.37%
23035	LIBERTY MUT FIRE INS CO	WI	13,409,681	1.26%
24082	OHIO SECURITY INS CO	NH	13,229,709	1.24%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	12,253,135	1.15%

Total Companies Writing in MA	210
Top 20 Companies	\$714,129,331
Direct Written Premium	67.0%
Remaining Companies	\$351,127,772
Direct Written Premium	33.0%
Total Direct Written Premium	\$1,065,257,103

## Commercial Multi-Peril

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
25992	NORTHERN SECURITY INS CO INC	VT	91,688,934	6.41%
41360	ARBELLA PROTECTION INS CO	MA	87,931,908	6.15%
18058	PHILADELPHIA IND INS CO	PA	85,585,914	5.98%
23965	NORFOLK & DEDHAM MUT FIRE INS CO	MA	71,389,483	4.99%
20281	FEDERAL INS CO	IN	50,697,034	3.54%
31534	CITIZENS INS CO OF AMER	MI	36,682,925	2.56%
24082	OHIO SECURITY INS CO	NH	34,072,877	2.38%
25623	PHOENIX INS CO	CT	31,457,412	2.20%
15067	QUINCY MUT FIRE INS CO	MA	28,594,919	2.00%
29939	MAIN ST AMER ASSUR CO	FL	26,210,194	1.83%
22292	HANOVER INS CO	NH	26,087,437	1.82%
25674	TRAVELERS PROP CAS CO OF AMER	CT	26,002,582	1.82%
19046	TRAVELERS CAS INS CO OF AMER	CT	24,357,728	1.70%
26018	VERMONT MUT INS CO	VT	23,285,699	1.63%
23876	MAPFRE INS CO	NJ	21,640,638	1.51%
42390	AMGUARD INS CO	PA	21,555,717	1.51%
27138	MIDVALE IND CO	WI	20,941,539	1.46%
22306	MASSACHUSETTS BAY INS CO	NH	20,920,932	1.46%
11150	ARCH INS CO	MO	19,612,547	1.37%
19682	HARTFORD FIRE INS CO	CT	19,269,918	1.35%

Total Companies Writing in MA	223
Top 20 Companies	\$767,986,337
Direct Written Premium	53.7%
Remaining Companies	\$662,159,448
Direct Written Premium	46.3%
Total Direct Written Premium	\$1,430,145,785

## Credit

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
27154	ATLANTIC SPECIALTY INS CO	NY	9,332,985	19.28%



16691	GREAT AMER INS CO	OH	6,381,832	13.18%
26565	OHIO IND CO	OH	5,721,450	11.82%
20516	EULER HERMES N AMER INS CO	MD	5,423,162	11.20%
26344	GREAT AMER ASSUR CO	OH	3,812,560	7.88%
11150	ARCH INS CO	MO	3,119,772	6.45%
31887	COFACE N AMER INS CO	MA	3,051,363	6.30%
25011	WESCO INS CO	DE	2,943,407	6.08%
25422	ATRADIUS TRADE CREDIT INS CO	MD	2,847,511	5.88%
29980	FIRST COLONIAL INS CO	FL	1,178,343	2.43%
19429	INSURANCE CO OF THE STATE OF PA	IL	1,070,164	2.21%
39217	QBE INS CORP	PA	829,194	1.71%
23728	NATIONAL GEN INS CO	MO	656,670	1.36%
10051	LYNDON SOUTHERN INS CO	DE	397,520	0.82%
29599	US SPECIALTY INS CO	TX	313,264	0.65%
23043	LIBERTY MUT INS CO	MA	308,755	0.64%
20699	ACE PROP & CAS INS CO	PA	219,579	0.45%
10847	CUMIS INS SOCIETY INC	IA	146,463	0.30%
16624	ALLIED WORLD SPECIALTY INS CO	DE	136,575	0.28%
28258	CONTINENTAL IND CO	NM	123,488	0.26%

Total Companies Writing in MA	29
Top 20 Companies	\$48,014,057
Direct Written Premium	99.2%
Remaining Companies	\$389,217
Direct Written Premium	0.8%
Total Direct Written Premium	\$48,403,274

## Deposit Funds

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
86509	VOYA RETIREMENT INS & ANN CO	CT	1,271,481,060	48.25%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	513,771,240	19.50%
69868	UNITED OF OMAHA LIFE INS CO	NE	329,832,956	12.52%
61271	PRINCIPAL LIFE INS CO	IA	171,654,745	6.51%
93629	PRUDENTIAL RETIREMENT INS & ANN CO	CT	98,648,608	3.74%
69019	STANDARD INS CO	OR	43,605,286	1.65%
70238	VARIABLE ANN LIFE INS CO	TX	29,982,752	1.14%

69345	TEACHERS INS & ANN ASSOC OF AMER	NY	23,989,934	0.91%
88072	TALCOTT RESOLUTION LIFE INS CO	CT	16,225,417	0.62%
91596	NEW YORK LIFE INS & ANN CORP	DE	16,078,738	0.61%
61115	ATLANTIC COAST LIFE INS CO	SC	14,497,610	0.55%
58033	KNIGHTS OF COLUMBUS	CT	14,350,082	0.54%
66168	MINNESOTA LIFE INS CO	MN	13,908,834	0.53%
63819	UNITY FINANCIAL LIFE INS CO	OH	8,275,584	0.31%
92622	WESTERN SOUTHERN LIFE ASSUR CO	OH	7,744,022	0.29%
68241	PRUDENTIAL INS CO OF AMER	NJ	7,702,450	0.29%
65242	LAFAYETTE LIFE INS CO	OH	4,873,000	0.18%
60054	AETNA LIFE INS CO	CT	4,361,274	0.17%
69663	USAA LIFE INS CO	TX	4,234,294	0.16%
91642	FORETHOUGHT LIFE INS CO	IN	3,788,906	0.14%

Total Companies Writing in MA	76
Top 20 Companies	\$2,599,006,792
Direct Written Premium	98.6%
Remaining Companies	\$36,335,919
Direct Written Premium	1.4%
Total Direct Written Premium	\$2,635,342,711

## **Fidelity & Surety**

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	28,075,299	13.17%
20281	FEDERAL INS CO	IN	25,066,016	11.75%
23043	LIBERTY MUT INS CO	MA	24,417,608	11.45%
13188	WESTERN SURETY CO	SD	16,478,730	7.73%
39306	FIDELITY & DEPOSIT CO OF MD	IL	9,305,363	4.36%
16691	GREAT AMER INS CO	OH	5,568,087	2.61%
29874	NORTH AMER SPECIALTY INS CO	NH	4,913,969	2.30%
18058	PHILADELPHIA IND INS CO	PA	4,566,820	2.14%
22292	HANOVER INS CO	NH	4,372,428	2.05%
23787	NATIONWIDE MUT INS CO	OH	4,161,860	1.95%
24074	OHIO CAS INS CO	NH	4,147,050	1.94%
27154	ATLANTIC SPECIALTY INS CO	NY	4,145,205	1.94%
26921	EVEREST REINS CO	DE	3,973,581	1.86%

14788	NGM INS CO	FL	3,957,751	1.86%
19682	HARTFORD FIRE INS CO	CT	3,871,904	1.82%
11150	ARCH INS CO	MO	3,644,022	1.71%
32603	BERKLEY INS CO	DE	3,334,108	1.56%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	3,263,310	1.53%
18694	GREAT MIDWEST INS CO	TX	3,153,833	1.48%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	2,952,789	1.38%

Total Companies Writing in MA	159
Top 20 Companies	\$163,369,733
Direct Written Premium	76.6%
Remaining Companies	\$49,868,508
Direct Written Premium	23.4%
Total Direct Written Premium	\$213,238,241

## Fire

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
21482	FACTORY MUT INS CO	RI	24,458,468	8.71%
34754	COMMERCE INS CO	MA	21,696,592	7.72%
13604	STARR SURPLUS LINES INS CO	TX	16,916,389	6.02%
26018	VERMONT MUT INS CO	VT	15,806,416	5.63%
19798	MERRIMACK MUT FIRE INS CO	MA	15,278,102	5.44%
16535	ZURICH AMER INS CO	NY	11,295,247	4.02%
25658	TRAVELERS IND CO	CT	11,161,912	3.97%
10014	AFFILIATED FM INS CO	RI	10,031,927	3.57%
21458	EMPLOYERS INS CO OF WAUSAU	WI	9,573,714	3.41%
35300	ALLIANZ GLOBAL RISKS US INS CO	IL	9,232,821	3.29%
42978	AMERICAN SECURITY INS CO	DE	7,244,123	2.58%
25674	TRAVELERS PROP CAS CO OF AMER	CT	7,016,610	2.50%
23035	LIBERTY MUT FIRE INS CO	WI	6,923,313	2.46%
17000	ARBELLA MUT INS CO	MA	5,642,926	2.01%
26522	MOUNT VERNON FIRE INS CO	NE	5,388,557	1.92%
26247	AMERICAN GUAR & LIAB INS	NY	5,367,816	1.91%
11185	FOREMOST INS CO GRAND RAPIDS MI	MI	5,162,533	1.84%
24554	XL INS AMER INC	DE	4,955,530	1.76%
19429	INSURANCE CO OF THE STATE OF PA	IL	4,645,277	1.65%

39454	SAFETY INS CO	MA	4,230,710	1.51%
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Total Companies Writing in MA	204
Top 20 Companies	\$202,028,983
Direct Written Premium	71.9%
Remaining Companies	\$78,838,680
Direct Written Premium	28.1%
Total Direct Written Premium	\$280,867,663

## Fraternals

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
58033	KNIGHTS OF COLUMBUS	CT	49,892,440	55.59%
56014	THRIVENT FINANCIAL FOR LUTHERANS	WI	15,400,089	17.16%
58068	INDEPENDENT ORDER OF FORESTERS US BR	NY	9,945,904	11.08%
57622	POLISH NATL ALLIANCE US OF NA	IL	3,000,908	3.34%
57770	CATHOLIC HOLY FAMILY SOCIETY	IL	2,427,668	2.70%
57541	MODERN WOODMEN OF AMER	IL	2,423,952	2.70%
57630	POLISH ROMAN CATHOLIC UNION OF AMER	IL	2,115,137	2.36%
58181	SUPREME COUNCIL THE ROYAL ARCANUM	MA	801,493	0.89%
56456	UNITED STATES LETTER CARRIERS MUT BE	TN	616,098	0.69%
56030	CATHOLIC FINANCIAL LIFE	WI	473,445	0.53%
57487	CATHOLIC ORDER OF FORESTERS	IL	465,063	0.52%
56332	FIRST CATH SLOVAK LADIES ASSN USA	OH	333,428	0.37%
57967	LUSO AMER LIFE INS SOCIETY	CA	310,727	0.35%
56685	GBU FINANCIAL LIFE	PA	303,811	0.34%
57215	UKRAINIAN NATL ASSN INC	NJ	260,376	0.29%
57142	SONS OF NORWAY	MN	193,331	0.22%
58009	POLICE & FIREMENS INS ASSN	IN	147,768	0.16%
57320	WOODMEN WORLD LIFE INS SOC	NE	147,667	0.16%
57010	WILLIAM PENN ASSN	PA	106,013	0.12%
56820	POLISH FALCONS OF AMER	PA	97,136	0.11%

Total Companies Writing in MA	41
Top 20 Companies	\$89,462,454
Direct Written Premium	99.7%

Remaining Companies	\$295,185
Direct Written Premium	0.3%
Total Direct Written Premium	\$89,757,639

## Health

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
12219	BCBS OF MA HMO BLUE INC	MA	5,261,000,712	22.86%
53228	BCBS OF MA	MA	3,153,218,674	13.70%
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	MA	2,745,758,874	11.93%
14131	TUFTS HLTH PUBLIC PLANS INC	MA	2,623,513,442	11.40%
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	MA	2,417,062,124	10.50%
95541	FALLON COMM HLTH PLAN INC	MA	1,765,291,459	7.67%
96911	HARVARD PILGRIM HLTH CARE INC	MA	1,350,776,003	5.87%
11109	ALLWAYS HLTH PARTNERS INC	MA	868,839,865	3.78%
95673	HEALTH NEW ENGLAND INC	MA	855,597,130	3.72%
18975	HPHC INS CO INC	MA	359,111,453	1.56%
60318	UNITED HLTHCARE INS CO OF IL	IL	358,801,879	1.56%
60117	TUFTS INS CO INC	MA	322,952,252	1.40%
52060	DENTAL SERV OF MA INC	MA	240,683,806	1.05%
95149	UNITEDHEALTHCARE OF NEW ENGLAND INC	RI	166,056,925	0.72%
73288	HUMANA INS CO	WI	94,310,695	0.41%
12575	SILVERSCRIPT INS CO	TN	89,325,146	0.39%
52632	ALTUS DENTAL INS CO INC	RI	78,475,039	0.34%
10155	WELLCARE PRESCRIPTION INS INC	AZ	59,095,570	0.26%
39616	VISION SERV PLAN INS CO	OH	54,159,157	0.24%
15497	DSM MA INS CO INC	MA	27,391,173	0.12%

Total Companies Writing in MA	38
Top 20 Companies	\$22,891,421,378
Direct Written Premium	99.5%
Remaining Companies	\$123,499,207
Direct Written Premium	0.5%
Total Direct Written Premium	\$23,014,920,585

## Homeowner's Multi-Peril

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
40274	CITATION INS CO	MA	213,122,608	7.67%
17000	ARBELLA MUT INS CO	MA	127,194,872	4.58%
34754	COMMERCE INS CO	MA	126,774,861	4.56%
19976	AMICA MUT INS CO	RI	109,933,741	3.96%
33618	SAFETY IND INS CO	MA	109,296,070	3.93%
26018	VERMONT MUT INS CO	VT	92,170,687	3.32%
19798	MERRIMACK MUT FIRE INS CO	MA	91,058,084	3.28%
36447	LM GEN INS CO	IL	82,860,071	2.98%
43001	NARRAGANSETT BAY INS CO	RI	68,862,542	2.48%
23035	LIBERTY MUT FIRE INS CO	WI	67,423,352	2.43%
19763	BAY STATE INS CO	MA	61,802,379	2.22%
23043	LIBERTY MUT INS CO	MA	54,261,403	1.95%
39454	SAFETY INS CO	MA	53,587,878	1.93%
12873	PRIVILEGE UNDERWRITERS RECP EXCH	FL	52,591,325	1.89%
26298	FARMERS PROP & CAS INS CO	RI	52,293,432	1.88%
31534	CITIZENS INS CO OF AMER	MI	50,564,027	1.82%
15067	QUINCY MUT FIRE INS CO	MA	48,847,968	1.76%
25941	UNITED SERV AUTOMOBILE ASSN	TX	47,595,390	1.71%
10969	UNITED PROP & CAS INS CO	FL	43,934,702	1.58%
25968	USAA CAS INS CO	TX	42,858,671	1.54%

Total Companies Writing in MA	180
Top 20 Companies	\$1,597,034,063
Direct Written Premium	57.5%
Remaining Companies	\$1,181,520,482
Direct Written Premium	42.5%
Total Direct Written Premium	\$2,778,554,545

## Liability other than Auto

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
20281	FEDERAL INS CO	IN	160,690,132	6.80%

19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	157,735,613	6.67%
37885	XL SPECIALTY INS CO	DE	145,725,989	6.16%
20443	CONTINENTAL CAS CO	IL	98,710,794	4.18%
22667	ACE AMER INS CO	PA	80,594,696	3.41%
31194	TRAVELERS CAS & SURETY CO OF AMER	CT	61,268,876	2.59%
25674	TRAVELERS PROP CAS CO OF AMER	CT	54,715,132	2.31%
11150	ARCH INS CO	MO	53,790,391	2.28%
25054	HUDSON INS CO	DE	52,790,310	2.23%
10641	ENDURANCE AMER INS CO	DE	48,527,121	2.05%
37540	BEAZLEY INS CO INC	CT	41,060,689	1.74%
18058	PHILADELPHIA IND INS CO	PA	38,894,752	1.65%
22292	HANOVER INS CO	NH	35,259,237	1.49%
24147	OLD REPUBLIC INS CO	PA	34,361,477	1.45%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	34,355,888	1.45%
16535	ZURICH AMER INS CO	NY	33,706,446	1.43%
38318	STARR IND & LIAB CO	TX	33,672,102	1.42%
37273	AXIS INS CO	IL	33,201,610	1.40%
10690	ALLIED WORLD NATL ASSUR CO	NH	32,689,596	1.38%
32603	BERKLEY INS CO	DE	32,416,686	1.37%

Total Companies Writing in MA	370
Top 20 Companies	\$1,264,167,537
Direct Written Premium	53.5%
Remaining Companies	\$1,099,752,847
Direct Written Premium	46.5%
Total Direct Written Premium	\$2,363,920,384

## Life

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
67091	NORTHWESTERN MUT LIFE INS CO	WI	513,029,599	11.25%
65935	MASSACHUSETTS MUT LIFE INS CO	MA	375,448,192	8.24%
66915	NEW YORK LIFE INS CO	NY	282,185,006	6.19%
65978	METROPOLITAN LIFE INS CO	NY	260,330,251	5.71%
65676	LINCOLN NATL LIFE INS CO	IN	218,255,758	4.79%
91596	NEW YORK LIFE INS & ANN CORP	DE	213,915,493	4.69%

65838	JOHN HANCOCK LIFE INS CO USA	MI	177,891,880	3.90%
79227	PRUCO LIFE INS CO	AZ	171,762,976	3.77%
64246	GUARDIAN LIFE INS CO OF AMER	NY	168,434,663	3.69%
70435	THE SAVINGS BANK MUT LIFE INS CO OF	MA	141,045,213	3.09%
68241	PRUDENTIAL INS CO OF AMER	NJ	107,612,986	2.36%
86231	TRANSAMERICA LIFE INS CO	IA	89,289,033	1.96%
87726	BRIGHTHOUSE LIFE INS CO	DE	80,692,804	1.77%
70815	HARTFORD LIFE & ACCIDENT INS CO	CT	67,616,313	1.48%
60488	AMERICAN GEN LIFE INS CO	TX	62,226,976	1.36%
66044	MIDLAND NATL LIFE INS CO	IA	61,217,292	1.34%
66168	MINNESOTA LIFE INS CO	MN	60,360,151	1.32%
69868	UNITED OF OMAHA LIFE INS CO	NE	59,552,780	1.31%
67466	PACIFIC LIFE INS CO	NE	57,750,414	1.27%
92657	NATIONWIDE LIFE & ANN INS CO	OH	57,123,548	1.25%

Total Companies Writing in MA	300
Top 20 Companies	\$3,225,741,328
Direct Written Premium	70.8%
Remaining Companies	\$1,333,170,630
Direct Written Premium	29.2%
Total Direct Written Premium	\$4,558,911,958

## Life All Lines

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	MASSACHUSETTS MUT LIFE INS CO	MA	2,303,955,246	11.98%
86509	VOYA RETIREMENT INS & ANN CO	CT	1,819,032,663	9.46%
65838	JOHN HANCOCK LIFE INS CO USA	MI	952,396,853	4.95%
65676	LINCOLN NATL LIFE INS CO	IN	735,113,174	3.82%
65978	METROPOLITAN LIFE INS CO	NY	681,009,346	3.54%
91596	NEW YORK LIFE INS & ANN CORP	DE	672,259,168	3.50%
69345	TEACHERS INS & ANN ASSOC OF AMER	NY	601,169,764	3.13%
68241	PRUDENTIAL INS CO OF AMER	NJ	593,824,012	3.09%
67091	NORTHWESTERN MUT LIFE INS CO	WI	580,275,083	3.02%
65056	JACKSON NATL LIFE INS CO	MI	523,475,384	2.72%
66915	NEW YORK LIFE INS CO	NY	514,455,174	2.68%
62944	EQUITABLE FINANCIAL LIFE INS CO	NY	445,869,884	2.32%



69868	UNITED OF OMAHA LIFE INS CO	NE	420,820,694	2.19%
66869	NATIONWIDE LIFE INS CO	OH	363,660,785	1.89%
60488	AMERICAN GEN LIFE INS CO	TX	340,824,318	1.77%
61689	ATHENE ANN & LIFE CO	IA	296,583,574	1.54%
90611	ALLIANZ LIFE INS CO OF N AMER	MN	285,004,482	1.48%
87726	BRIGHTHOUSE LIFE INS CO	DE	271,849,545	1.41%
86231	TRANSAMERICA LIFE INS CO	IA	264,746,189	1.38%
65005	RIVERSOURCE LIFE INS CO	MN	256,359,903	1.33%

Total Companies Writing in MA	308
Top 20 Companies	\$12,922,685,241
Direct Written Premium	67.2%
Remaining Companies	\$6,303,354,539
Direct Written Premium	32.8%
Total Direct Written Premium	\$19,226,039,780

## Life / Other Funds

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
65935	MASSACHUSETTS MUT LIFE INS CO	MA	897,503,851	28.53%
65838	JOHN HANCOCK LIFE INS CO USA	MI	772,527,826	24.56%
65978	METROPOLITAN LIFE INS CO	NY	397,921,593	12.65%
66915	NEW YORK LIFE INS CO	NY	206,509,458	6.56%
70688	TRANSAMERICA FINANCIAL LIFE INS CO	NY	154,744,535	4.92%
86231	TRANSAMERICA LIFE INS CO	IA	135,727,332	4.31%
93629	PRUDENTIAL RETIREMENT INS & ANN CO	CT	114,802,907	3.65%
68241	PRUDENTIAL INS CO OF AMER	NJ	84,547,091	2.69%
86509	VOYA RETIREMENT INS & ANN CO	CT	80,264,497	2.55%
69019	STANDARD INS CO	OR	74,500,810	2.37%
68322	GREAT W LIFE & ANN INS CO	CO	73,416,074	2.33%
62626	CMFG LIFE INS CO	IA	46,943,811	1.49%
88668	MUTUAL OF AMER LIFE INS CO	NY	43,628,141	1.39%
66168	MINNESOTA LIFE INS CO	MN	37,781,892	1.20%
88072	TALCOTT RESOLUTION LIFE INS CO	CT	19,640,520	0.62%
62944	EQUITABLE FINANCIAL LIFE INS CO	NY	4,000,349	0.13%
71153	TALCOTT RESOLUTION LIFE & ANN INS CO	CT	696,517	0.02%
67172	OHIO NATL LIFE INS CO	OH	487,916	0.02%

Total Companies Writing in MA	18
Top 20 Companies	\$3,145,645,120
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$3,145,645,120

## Medical Malpractice

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
10206	MEDICAL PROFESSIONAL MUT INS CO	MA	67,280,975	57.33%
11843	MEDICAL PROTECTIVE CO	IN	13,099,918	11.16%
20427	AMERICAN CAS CO OF READING PA	PA	8,677,907	7.39%
34495	DOCTORS CO AN INTERINS EXCH	CA	5,583,794	4.76%
15890	INTEGRIS INS CO	CT	5,277,116	4.50%
10638	PROSELECT INS CO	NE	2,980,361	2.54%
42617	MAG MUT INS CO	GA	2,341,837	2.00%
36277	MEDICAL MUT INS CO OF ME	ME	2,303,750	1.96%
19917	LIBERTY INS UNDERWRITERS INC	IL	1,827,433	1.56%
22667	ACE AMER INS CO	PA	1,665,387	1.42%
14460	PROASSURANCE INS CO OF AMER	IL	1,620,971	1.38%
15865	NCMIC INS CO	IA	1,243,227	1.06%
35157	FAIR AMER INS & REINS CO	NY	868,263	0.74%
22730	ALLIED WORLD INS CO	NH	421,212	0.36%
10801	FORTRESS INS CO	IL	347,344	0.30%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	309,065	0.26%
13714	PHARMACISTS MUT INS CO	IA	285,016	0.24%
22276	BERKSHIRE HATHAWAY SPECIALTY INS CO	NE	258,587	0.22%
19380	AMERICAN HOME ASSUR CO	NY	223,444	0.19%
43460	ASPEN AMER INS CO	TX	182,362	0.16%

Total Companies Writing in MA	39
Top 20 Companies	\$116,797,969
Direct Written Premium	99.5%
Remaining Companies	\$558,991

Direct Written Premium	0.5%
Total Direct Written Premium	\$117,356,960

## Mortgage & Financial Guaranty

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
40266	ARCH MORTGAGE INS CO	WI	31,496,285	26.62%
29858	MORTGAGE GUAR INS CORP	WI	20,297,241	17.16%
38458	GENWORTH MORTGAGE INS CORP	NC	17,952,449	15.17%
33790	RADIAN GUAR INC	PA	16,769,149	14.17%
13695	NATIONAL MORTGAGE INS CORP	WI	12,897,073	10.90%
13634	ESSENT GUAR INC	PA	12,117,733	10.24%
15873	UNITED GUAR RESIDENTIAL INS CO	NC	3,978,690	3.36%
28452	REPUBLIC MORTGAGE INS CO	NC	887,834	0.75%
18708	AMBAC ASSUR CORP	WI	722,157	0.61%
18287	ASSURED GUAR MUNICIPAL CORP	NY	502,066	0.42%
18732	ARCH MORTGAGE GUAR CO	WI	498,853	0.42%
16675	GENWORTH MORTGAGE INS CORP OF NC	NC	138,944	0.12%
14380	BUILD AMER MUT ASSUR CO	NY	36,575	0.03%
12041	MBIA INS CORP	NY	9,383	0.01%
30180	ASSURED GUAR CORP	MD	6,581	0.01%
29114	ARCH MORTGAGE ASSUR CO	WI	1,942	0.00%

Total Companies Writing in MA	16
Top 20 Companies	\$118,312,955
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$118,312,955

## Ocean & Inland Marine

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
19917	LIBERTY INS UNDERWRITERS INC	IL	84,589,314	10.54%

20443	CONTINENTAL CAS CO	IL	56,092,375	6.99%
12190	AMERICAN PET INS CO	NY	43,846,434	5.46%
11991	NATIONAL CAS CO	OH	41,753,714	5.20%
11630	JEFFERSON INS CO	NY	37,396,619	4.66%
22667	ACE AMER INS CO	PA	37,148,095	4.63%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	24,321,618	3.03%
21113	UNITED STATES FIRE INS CO	DE	21,173,054	2.64%
38318	STARR IND & LIAB CO	TX	15,847,653	1.97%
27154	ATLANTIC SPECIALTY INS CO	NY	14,954,117	1.86%
21482	FACTORY MUT INS CO	RI	14,381,651	1.79%
25674	TRAVELERS PROP CAS CO OF AMER	CT	14,380,787	1.79%
22292	HANOVER INS CO	NH	13,844,503	1.72%
16535	ZURICH AMER INS CO	NY	12,118,242	1.51%
16691	GREAT AMER INS CO	OH	11,479,865	1.43%
37885	XL SPECIALTY INS CO	DE	10,881,585	1.36%
31325	ACADIA INS CO	IA	10,475,076	1.30%
37923	GEICO MARINE INS CO	NE	10,389,618	1.29%
10111	AMERICAN BANKERS INS CO OF FL	FL	9,739,871	1.21%
23469	AMERICAN MODERN HOME INS CO	OH	8,330,718	1.04%

Total Companies Writing in MA	294
Top 20 Companies	\$493,144,909
Direct Written Premium	61.4%
Remaining Companies	\$309,626,208
Direct Written Premium	38.6%
Total Direct Written Premium	\$802,771,117

## Private Passenger Auto

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	1,084,956,351	19.34%
22063	GOVERNMENT EMPLOYEES INS CO	NE	596,360,121	10.63%
17000	ARBELLA MUT INS CO	MA	417,829,882	7.45%
39454	SAFETY INS CO	MA	412,270,786	7.35%
14737	PLYMOUTH ROCK ASSUR CORP	MA	368,211,600	6.56%
35882	GEICO GEN INS CO	NE	331,311,484	5.91%
16322	PROGRESSIVE DIRECT INS CO	OH	268,316,913	4.78%

19070	STANDARD FIRE INS CO	CT	224,493,178	4.00%
23043	LIBERTY MUT INS CO	MA	199,191,915	3.55%
36447	LM GEN INS CO	IL	170,586,494	3.04%
26298	FARMERS PROP & CAS INS CO	RI	161,897,130	2.89%
12484	LIBERTY MUT PERSONAL INS CO	NH	146,431,429	2.61%
19976	AMICA MUT INS CO	RI	127,888,021	2.28%
19232	ALLSTATE INS CO	IL	99,254,800	1.77%
24260	PROGRESSIVE CAS INS CO	OH	93,975,061	1.68%
31534	CITIZENS INS CO OF AMER	MI	90,558,609	1.61%
15067	QUINCY MUT FIRE INS CO	MA	77,996,808	1.39%
22292	HANOVER INS CO	NH	75,879,348	1.35%
25968	USAA CAS INS CO	TX	65,416,991	1.17%
24740	SAFECO INS CO OF AMER	NH	62,102,856	1.11%

Total Companies Writing in MA	62
Top 20 Companies	\$5,074,929,777
Direct Written Premium	90.5%
Remaining Companies	\$535,078,509
Direct Written Premium	9.5%
Total Direct Written Premium	\$5,610,008,286

## Property & Casualty Total

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
34754	COMMERCE INS CO	MA	1,382,555,188	8.29%
22063	GOVERNMENT EMPLOYEES INS CO	NE	601,075,102	3.61%
39454	SAFETY INS CO	MA	575,174,189	3.45%
17000	ARBELLA MUT INS CO	MA	563,161,918	3.38%
14737	PLYMOUTH ROCK ASSUR CORP	MA	372,708,665	2.24%
35882	GEICO GEN INS CO	NE	331,311,483	1.99%
20281	FEDERAL INS CO	IN	306,313,361	1.84%
23043	LIBERTY MUT INS CO	MA	303,423,969	1.82%
16322	PROGRESSIVE DIRECT INS CO	OH	272,253,132	1.63%
19070	STANDARD FIRE INS CO	CT	256,455,624	1.54%
36447	LM GEN INS CO	IL	254,935,250	1.53%
19976	AMICA MUT INS CO	RI	252,312,878	1.51%
40274	CITATION INS CO	MA	238,267,941	1.43%

26298	FARMERS PROP & CAS INS CO	RI	229,536,077	1.38%
19445	NATIONAL UNION FIRE INS CO OF PITTS	PA	226,136,094	1.36%
41360	ARBELLA PROTECTION INS CO	MA	218,132,437	1.31%
22667	ACE AMER INS CO	PA	211,203,463	1.27%
26018	VERMONT MUT INS CO	VT	204,267,937	1.23%
20443	CONTINENTAL CAS CO	IL	195,629,079	1.17%
31534	CITIZENS INS CO OF AMER	MI	188,785,042	1.13%

Total Companies Writing in MA	584
Top 20 Companies	\$7,183,638,829
Direct Written Premium	43.1%
Remaining Companies	\$9,489,685,130
Direct Written Premium	56.9%
Total Direct Written Premium	\$16,673,323,959

## Surplus Lines

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
20079	NATIONAL FIRE & MARINE INS CO	NE	65,380,931	4.84%
35378	EVANSTON INS CO	IL	64,342,180	4.76%
10725	LIBERTY SURPLUS INS CORP	NH	56,416,601	4.18%
26883	AIG SPECIALTY INS CO	IL	53,290,793	3.94%
25445	IRONSHORE SPECIALTY INS CO	AZ	53,187,283	3.94%
19437	LEXINGTON INS CO	DE	47,190,926	3.49%
17370	NAUTILUS INS CO	AZ	46,880,274	3.47%
41297	SCOTTSDALE INS CO	OH	43,392,753	3.21%
36940	INDIAN HARBOR INS CO	DE	39,766,492	2.94%
41718	ENDURANCE AMER SPECIALTY INS CO	DE	38,519,009	2.85%
31127	COLUMBIA CAS CO	IL	34,369,510	2.54%
44520	CRUM & FORSTER SPECIALTY INS CO	DE	31,666,031	2.34%
10851	EVEREST IND INS CO	DE	30,798,633	2.28%
27960	ILLINOIS UNION INS CO	IL	30,223,579	2.24%
11515	QBE SPECIALTY INS CO	ND	26,960,922	2.00%
25038	NORTH AMER CAPACITY INS CO	NH	26,942,867	1.99%
10833	GEMINI INS CO	DE	25,038,581	1.85%
10172	WESTCHESTER SURPLUS LINES INS CO	GA	24,416,296	1.81%
26620	AXIS SURPLUS INS CO	IL	23,604,459	1.75%

13196	WESTERN WORLD INS CO	NH	22,257,938	1.65%
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Total Companies Writing in MA	115
Top 20 Companies	\$784,646,058
Direct Written Premium	58.1%
Remaining Companies	\$566,269,006
Direct Written Premium	41.9%
Total Direct Written Premium	\$1,350,915,064

## Title Insurance

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
50814	First Amer Title Ins Co	NE	146,289,011	27.71%
51268	Connecticut Attorneys Title Ins Co	VT	91,389,830	17.31%
50520	Old Republic Natl Title Ins Co	FL	77,782,652	14.73%
50229	Chicago Title Ins Co	FL	63,968,402	12.12%
50121	Stewart Title Guar Co	TX	41,760,573	7.91%
51586	Fidelity Natl Title Ins Co	FL	34,485,878	6.53%
50083	Commonwealth Land Title Ins Co	FL	32,980,390	6.25%
50050	Westcor Land Title Ins Co	SC	18,892,155	3.58%
51152	WFG Natl Title Ins Co	SC	7,402,088	1.40%
11974	Amrock Title Ins Co	TX	3,931,866	0.74%
50016	Title Resources Guar Co	TX	3,707,237	0.70%
51411	American Guar Title Ins Co	OK	3,045,293	0.58%
50130	Doma Title Ins Inc	SC	2,040,498	0.39%
51020	National Title Ins of NY Inc	NY	150,410	0.03%
51632	Radian Title Ins Inc	OH	122,166	0.02%
51578	AmTrust Title Ins Co	NY	23,861	0.00%

Total Companies Writing in MA	16
Top 20 Companies	\$527,972,310
Direct Written Premium	100.0%
Remaining Companies	\$-
Direct Written Premium	0.0%
Total Direct Written Premium	\$527,972,310

## Workers' Compensation

NAIC #	Company Name	State	Total Premium Written in MA	Market Share in MA
33758	ASSOCIATED INDUSTRIES OF MA MUT INS	MA	82,291,143	6.85%
22667	ACE AMER INS CO	PA	55,159,873	4.59%
25682	TRAVELERS IND CO OF CT	CT	42,840,227	3.57%
40142	AMERICAN ZURICH INS CO	IL	37,664,617	3.14%
11104	ASSOCIATED EMPLOYERS INS CO	MA	37,002,582	3.08%
16535	ZURICH AMER INS CO	NY	34,138,755	2.84%
44326	ATLANTIC CHARTER INS CO	MA	31,638,576	2.63%
30104	HARTFORD UNDERWRITERS INS CO	CT	31,179,469	2.60%
25666	TRAVELERS IND CO OF AMER	CT	28,048,441	2.33%
33600	LM INS CORP	IL	24,536,259	2.04%
23035	LIBERTY MUT FIRE INS CO	WI	24,460,085	2.04%
23841	NEW HAMPSHIRE INS CO	IL	24,367,119	2.03%
31470	NORGUARD INS CO	PA	24,285,767	2.02%
25658	TRAVELERS IND CO	CT	22,609,045	1.88%
25011	WESCO INS CO	DE	22,469,287	1.87%
42390	AMGUARD INS CO	PA	22,184,577	1.85%
29459	TWIN CITY FIRE INS CO	IN	20,787,903	1.73%
11984	INDEPENDENCE CAS INS CO	MA	19,468,299	1.62%
25674	TRAVELERS PROP CAS CO OF AMER	CT	19,126,719	1.59%
22357	HARTFORD ACCIDENT & IND CO	CT	18,555,736	1.54%

Total Companies Writing in MA	253
Top 20 Companies	\$622,814,479
Direct Written Premium	51.8%
Remaining Companies	\$578,531,606
Direct Written Premium	48.2%
Total Direct Written Premium	\$1,201,346,085