

# Wisconsin Insurance News

Issue 1 - Spring 2014

## Commissioner's Note

By Ted Nickel, Commissioner of Insurance

I have spent a lot of time working on health insurance reform issues and dealing with the federal health care law over the past three years and sometimes it seems like that's all that's going on. But, I have also been quite busy with my role at the National Association of Insurance Commissioners (NAIC) and I thought I'd share some of the issues and areas we've been working on there. The NAIC is made up of Insurance Commissioners, Superintendents and Directors from all 50 states, DC and the U.S. Territories. NAIC membership is as diverse as are the insurance marketplaces represented by them. Spending a day with the NAIC is interesting and a great example of open dialogue and what a willingness to work together looks like.

Much of what we as regulators do is to protect consumers, monitor solvency of insurers, and set uniform standards but also protect from regulatory creep at home and abroad.

The best way we can safeguard our exceedingly successful state-based system of regulation is to continue to modernize and shore up any areas of perceived weakness. An excellent example of where we have been successful with this tact is in collateral for reinsurance.

Over a number of years this body crafted the NAIC Credit for Reinsurance Model Law & Regulation, which was last revised in 2011. These revisions served to reduce reinsurance collateral requirements for certified reinsurers that are licensed and domiciled in Qualified Jurisdictions.

Developed as a tool for collaboration between the states, we have seen interest internationally in becoming a Qualified Jurisdiction. The Bermuda Monetary Authority has accepted an invitation to participate in an expedited review process, and we have indications that others are looking seriously at participation.

While the NAIC is a national standard-setter for insurance, models like these can be adapted for use internationally, protecting U.S. regulatory tools that have proven effective from an adaption of foreign standards.

Our work on modernizing financial standards doesn't end there, of course. Last year, a supermajority of regulators determined, rightly, that a move to Principle Based Reserving (PBR) is in the best interest of consumers. PBR standards require companies to tailor their reserves based on the specific risks they've actually assumed.

To date, seven states have enacted legislation to implement PBR, so we have a long way to go before we see 42 states or 75% of U.S. premium dollars represented. We need to work with our legislatures to get this model passed in our states, just as the PBR task force continues to work on the implementation plan to ensure a smooth transition.

Again, these types of improvements to our system are at the core of ensuring regulation continues to meet the needs of both consumers and the market. It also shows our international counterparts that we are not wholly averse to updates to our regulatory system.

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## Does Wisconsin require a firm license?

A “firm” means a corporation, association, partnership, limited liability company, limited liability partnership, or other legal entity.

Wisconsin does not require a firm to hold a license\*. A firm has no authority to transact insurance business in our state—the authority to transact insurance business lies with the individual licensee. Each individual selling, soliciting, or negotiating the placement of insurance products is required to hold an individual intermediary (agent) license and must be appointed by an insurance carrier.

A firm may obtain an insurance intermediary firm license by applying online on Sircon at [www.sircon.com](http://www.sircon.com) or NIPR at [www.nipr.com](http://www.nipr.com). The firm must designate a licensed producer responsible for the firm’s compliance with the insurance laws, rules and regulations of this state.

The firm is subject to the recordkeeping requirements under the provisions of s. Ins 6.61, Wis. Adm. Code, regarding intermediary records.

Reinsurance intermediary firm and managing general agent firm are required to hold a license. For more information refer to [oci.wi.gov/agentlic/corplic.htm](http://oci.wi.gov/agentlic/corplic.htm).

\* **Required Registration with the Wisconsin Department of Financial Institutions**—The Corporation Section of the Division of Corporate & Consumer Services at the Department of Financial Institutions is the filing office for the organizational instruments to create corporations, limited partnerships, limited liability partnerships, and limited liability companies, as well as documents to amend those charters in some respect or other. The unit also licenses foreign (out-of-state) organizations desiring to transact business in Wisconsin. To contact the Corporations Division by telephone, please call (608) 261-7577.

## Testing Services and Administrator for Prelicensing and Continuing Education Program

The State of Wisconsin, Department of Administration, Consolidated Agency Purchasing Services (CAPS), on behalf of the Office of the Commissioner of Insurance has finalized the review of Request for Proposal for the professional licensing testing services and administration for prelicensing and continuing education program for Wisconsin insurance intermediaries. The new contract was awarded to Prometric\*, Inc., for an effective date of July 1, 2014.

Pearson VUE will continue to administer the licensing exams for individuals registered on or before June 30, 2014. Online

reservations continue to be the most efficient way for candidates to schedule their examination. Candidates can register at [www.pearsonvue.com/wi/insurance](http://www.pearsonvue.com/wi/insurance) or by phone at (800) 274-8979.

\* Prometric, a wholly owned subsidiary of Educational Testing Services, is a trusted provider of technology-enabled testing and assessment. Prometric develops, delivers and administers more than 10 million tests a year on behalf of approximately 400 clients in the health care, academic, financial, government, professional, corporate and information technology markets.

## Role of Agents in the Federally Facilitated Exchange

Agents can assist consumers in completing eligibility applications, comparing and selecting qualified health plans (QHPs), and enrolling consumers through the exchange. In states where a federally facilitated exchange is operating, all agents must register with the Centers for Medicare & Medicaid Services (CMS) so that they may assist qualified individuals for individual marketplace coverage. In completing the registration process, the agent will:

1. Confirm his or her identity.
2. Complete a marketplace-specific online training course.
3. Agree to comply with federal and state laws, rules, standards and policies, including those related to privacy and security policies, as a condition of working with consumers in the exchange.

For more information, go to the CMS Web site at:

[www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/a-b-resources.html](http://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/a-b-resources.html).

In addition, agents are highly encouraged to complete a Wisconsin-specific public assistance health care program. This training provides four continuing education credits. A list of “CE Navigator” courses is available on Sircon’s Web site at [www.sircon.com](http://www.sircon.com) by selecting “Look Up Education Courses/Credit” and following the prompts.

Any questions, please contact the Agent Licensing Section at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov).

## Administrative Actions

OCI does not include its administrative actions in this edition of the Wisconsin Insurance News. Administrative actions taken by OCI for the previous period are available for review at: [oci.wi.gov/ins\\_rev/0413\\_1213admact.pdf](http://oci.wi.gov/ins_rev/0413_1213admact.pdf)

## Continuing Education

Resident intermediaries (agents) who hold a property, casualty, personal lines P&C, life, and accident & health or the limited line of automobile license must complete a total of 24 hours of continuing education (CE) during the biennium. At least 3 credit hours must be in the ethics of insurance. No other restrictions apply. Excess credit hours accumulated during any reporting period will not be carried forward to the next reporting period. Agents may receive credit hours for attending the same course only once during any biennium.

Agents who are required to complete CE will receive a notice mailed 90 days prior to the expiration date if they are deficient in CE hours. Agents are encouraged to not wait until the last few weeks of their

reporting period to complete continuing education. By rule, CE providers are given 10 days to electronically bank the CE credits. Failure to complete all CE hours on or before the last day of the agent's birth month will result in the license cancellation and termination of active appointment(s). There is no grace period for the completion of the required CE courses during the biennium.

A list of CE courses is available on Sircon's Web site at [www.sircon.com](http://www.sircon.com) by selecting "Look Up Education Courses/Credit" and following the prompts.

Any questions regarding CE courses should be directed to Pearson VUE at (800) 274-4679.

## License Renewal

Resident and nonresident intermediaries (agents) are required to submit their biennial regulation fee in order to continue conducting insurance business in Wisconsin. Approximately 60 days prior to the license expiration, the Office of the Commissioner of Insurance (OCI) mails a renewal notice (postcard) by first class mail to the mailing address on file with our office. The renewal fees to be paid by each licensed individual intermediary agent are: \$35 for resident agents and \$70 for nonresident agents. Failure to pay the renewal fee on or before the last day of the agent's birth month will result in the license cancellation and termination of active appointment(s).

Agents must renew their license online either by credit card, debit card or electronic check. Agents have the following three options to make their renewal payment: Sircon at [www.sircon.com](http://www.sircon.com), NIPR at [www.nipr.com](http://www.nipr.com), or OCI at [oci.wi.gov](http://oci.wi.gov). Due to a 3- to 5-day time delay in posting the transaction with OCI and NIPR, agents making payments within 5 days of their license expiration date are required to use Sircon to avoid delays or license cancellation.

Any questions, please contact the Agent Licensing Section at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov).

### Miss an issue of the WIN?

No problem. We have old issues of Wisconsin Insurance News dating back to 2002 on our Web site:

[http://oci.wi.gov/ins\\_rev.htm](http://oci.wi.gov/ins_rev.htm)

## Application Procedures Following License Cancellation

Intermediaries (agents) who have had their license cancelled for failure to pay the renewal fee or failure to comply with continuing education (CE) requirements must apply for a reinstatement.

Agents who held a major line or limited line license have one year from their expiration date to reinstate without having to complete any preclicensing education or examination. Agents must complete CE requirements and the hours must be banked electronically with our office before they can reinstate.

Resident intermediaries who wish to reapply for a major line license after one year are required to complete preclicensing education, take the law portion of each examination and resubmit fingerprints. Resident intermediaries holding a limited line would need to retake the entire examination.

Resident and nonresident agents may submit a reinstatement application online at [www.sircon.com](http://www.sircon.com) or [www.nipr.com](http://www.nipr.com).

Any questions, please contact the Agent Licensing Section at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov).

## Name or Address Changes

Intermediaries (agents) or firms must notify the Office of the Commissioner of Insurance (OCI) in writing, within 30 days, of any changes in the name, residence, mailing and/or business address. Licensees should use the following options:

- Notify the Agent Licensing Section by e-mail at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov), by fax at (608) 267-9451 or in writing at P.O. Box 7872, Madison, WI 53707-7872. Please include name, license number, new address and effective date. Telephone requests are not accepted.
- Submit your individual agent address change on NIPR at [www.nipr.com](http://www.nipr.com).

## Did you know?

An intermediary (agent) may not accept compensation from an insured or from both an insured and another source due to the insured's purchase of insurance or for advice regarding the insured's insurance needs or coverage unless the agent, before the insured incurs an obligation to pay compensation, clearly and conspicuously and in writing discloses to the insured all of the following:

- (a) The amount of compensation to be paid by the insured, excluding commissions paid by the insurer to the agent.
- (b) If compensation will be paid by another source, the fact that the agent will also receive compensation from the other source.

For more information, please refer to s. 628.32 (1), Wis. Stat., regarding disclosure required.

No intermediary (agent) or insurer may pay any consideration, nor reimburse out-of-pocket expenses, to any natural person for services performed within this state as an intermediary if he or she knows or should know that the payee is not licensed under ss. 628.04 or 628.09, Wis. Stat. No natural person may accept compensation for services performed as an agent unless the natural person is licensed under ss. 628.04 or 628.09, Wis. Stat.

Exceptions. This section does not prohibit:

- (a) The payment of deferred commissions to formerly licensed agent and broker intermediaries or their assignees; or
- (b) The proper exchange of business between agent and broker intermediary lawfully licensed in this state.

For more information, please refer to s. 628.6, Wis. Stat., regarding sharing commissions.

## Change in Residency Status

Intermediaries whose residential address change involves a change from one state to another state are reminded that, in addition to the address change, they also must provide OCI with either a letter of certification or other comparable evidence from the new state of residence.

- A licensed nonresident agent, after becoming a Wisconsin resident, may retain authority under the nonresident agent license for a maximum of 60 days at which time all authority granted under the nonresident license will cease.
- A licensed resident agent, after becoming a resident of another state, may retain authority under the resident license for a maximum of 60 days at which time all authority granted under the resident license will cease.

- A licensed nonresident agent after becoming a resident of a state other than Wisconsin may retain licensing authority under the nonresident license for a maximum of 60 days at which time all authority granted under the nonresident license will cease.

- If an agent changes residency status and becomes licensed under the new status, all authority granted by the license issued under the former status will terminate on the date the new license is issued.

For more information, please refer to s. Ins 6.59 (8), Wis. Adm. Code. Any questions, please contact the Agent Licensing Section at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov).

## Digital Fingerprints for Resident License Applicants

Wisconsin law requires that any individual resident applying for a license or adding additional lines of authority to a current license submit fingerprints and criminal background check as a part of the application.

Fingerprinting will no longer be available at Pearson VUE test centers. Applicants can make a reservation online on Fieldprint at [www.fieldprintwisconsin.com](http://www.fieldprintwisconsin.com). At the time of reservation, applicants must enter the Fieldprint code: FPWIOCInsurance.

Applicants can use upper or lower case to enter the field code.

The cost is \$39.25 for digital fingerprinting. Fingerprints can be submitted at any time but an application will not be processed until fingerprints are submitted. Fingerprint information is valid for 180 days.

Any questions, please contact the Agent Licensing Section at [ociagentlicensing@wisconsin.gov](mailto:ociagentlicensing@wisconsin.gov).

## What about sharing commissions?

No intermediary (agent) or insurance company may pay any consideration, or reimburse out-of-pocket expenses, to any person for services performed within Wisconsin as an intermediary if the intermediary or insurance company knows or should know that the person getting paid is not licensed.

No person may accept compensation for services performed as an intermediary unless the person is licensed under s. 628.04,

Wis. Stat. An intermediary may direct that his or her commission be paid to a firm (agency) of which the intermediary is a member, employee, officer or agent.

The law does not prohibit the payment of deferred commissions to formerly licensed agents. Also, the law does not prohibit the proper exchange of business between intermediaries and brokers as long as it complies with s. Ins 6.66, Wis. Adm. Code.

*Continued from page 1*

Just as we must continue the important work of modernizing our solvency framework, our focus on combining state group supervision is just as critical.

Another important accomplishment for the NAIC is the adoption of the Risk Management and Own Risk and Solvency Assessment Model Act (ORSA) in September of last year. A company's self-assessment of its "own risk" is a critical first-look across the entire company to better anticipate where problems may arise. The ORSA model is an essential element in our effort to modernize the U.S. approach to the regulation of insurance groups—it will help regulators foresee issues before the issue becomes a problem. It will become effective in 2015, with the first reports required that year.

The ORSA model follows our recent work amending the NAIC Holding Company Model Act, changes which have already been adopted by 23 states. Since the early '70s the Holding Company Model Act has provided state insurance departments the framework for insurance group supervision, a process that ensures that state examinations of insurers are coordinated and not duplicative.

Following the 2008 financial crisis, and as the result of the NAIC Solvency Modernization Initiative, state regulators recognized that improvements could be made in the area of group supervision. Even though most of the troubled companies' issues were centered on the federal regulatory process, state regulators used the experience to better understand best regulatory practices.

Together, the changes to the NAIC Holding Company Act and the ORSA are tools we can use to help identify potential contagion risks from the group that could negatively affect the regulated insurance entity and, by extension, its policyholders. Again, we need to work closely with our state legislatures to ensure these tools are incorporated into state law as soon as possible.

The last financial crisis was a game-changer for our involvement in international and domestic regulatory affairs. Whether it's any of the alphabet soup of regulatory agencies like the FSOC, the FIO, the FSB, or the IAIS, there is a global view toward converging and harmonizing the world's financial regulatory systems. Because of our system of government and our long history of state-based regulation of the insurance industry, we face challenges to meet emerging global standards, such as regulation over an insurance group, but must remain engaged to help ensure the system continues to be effective, and not disadvantaging the U.S. insurance industry. The NAIC continues to devote significant human and financial resources to these initiatives at home and abroad. Moving toward a more harmonized global system of regulation will require us to think and see beyond our state's borders.

Finally, while it is the primary responsibility of the NAIC president-elect to oversee the budget process, as a member of the Executive committee and member of the Audit committee it's an obligation that I share and a process that has been, and will continue to be, transparent. It's a lot of work, but the financial position of this organization has never been stronger and will always be a priority to ensure the needs of state regulators can be met.

We take these steps forward because it's the right thing to do to protect policyholders, ensure stable markets and support modernization of the industry. But there is a side benefit. These efforts updating our system will help ensure the U.S. insurance industry remains a world leader. This not only helps U.S. consumers but also provides good paying jobs at financially stable companies.

## Updated Publications

OCI continues to update publications. Choose the "Publications" link in the top navigation on our home page, [oci.wi.gov](http://oci.wi.gov), then "Consumer Publications" to view, print or request a copy.

## Visit the OCI Web Site and Subscribe to OCI E-mail Notifications

OCI's Web site ([oci.wi.gov](http://oci.wi.gov)) has information to answer most of your insurance questions. You are encouraged to check the site first when looking for information. The "Agent/Agency" and "Company" tabs have the answers to most questions asked by agents and company representatives. Other important locations include "Laws/Rules/Bulletins" and "Press Releases" pages. Click on the "What's New" link to see the latest information added to the Web site. To sign up to receive an e-mail whenever OCI issues new bulletins to insurers, press releases, public meeting notices and future issues of the Wisconsin Insurance News, go to [oci.wi.gov/listserv.htm](http://oci.wi.gov/listserv.htm).

## Navigators and Certified Application Counselors

OCI Emergency Rule EmR1314 pertains to the Affordable Care Act and permitted and prohibited activities of navigators, non-navigator assisters, certified application counselors and related entities. The EmR1314 outlines specifically how navigators and certified application counselors may assist consumers with the Affordable Care Act.

Below are permitted and prohibited activities for your information and reference. For more information, please visit the OCI Web site at [oci.wi.gov/navigator/overview.htm](http://oci.wi.gov/navigator/overview.htm).

### Permitted Activities:

- Conduct public education activities to raise awareness of available Qualified Health Plans (QHP) within the federal exchange.
- Distribute fair and impartial information concerning enrollment in a QHP through the federal exchange and the availability of premium tax credits and cost-sharing reductions that may be available.
- Explain that consumers may purchase health plans through the federal exchange or off the exchange.
- Make consumers aware that plans are available in the outside market and that they may want to talk with a licensed health insurance agent about health insurance options.
- Facilitate enrollment in a QHP through the federal exchange. Outline information that a consumer will need to have available when applying for coverage through the federal exchange. Provide information that will allow the consumer to access the federal exchange either at their home or a computer terminal provided by the navigator.
- Explain to the consumer the following information: potential eligibility for public/governmental programs, and

how the federal health insurance premium tax credit and cost-sharing reductions work and potential risks, if any, for use of the federal health insurance premium tax credit.

- Describe the features and benefits of health coverage in general terms, including cost-sharing mechanisms like deductibles, copays or coinsurance and how these work or affect the consumer.
- Describe what a summary of benefits document is and where to locate a summary of benefits and relevant cost-sharing provisions within the information from QHPs.
- Explain how to find information about provider networks.
- Describe the different metal tiers (i.e., bronze, silver, gold and platinum) and how the benefits may change at different metal tiers based upon the consumer's income.
- Provide information in a manner that is culturally and linguistically appropriate to the needs of the population being served by the federal exchange.
- Provide a referral for an individual to an appropriate state or federal agency who has a grievance, complaint or question regarding their health plan, coverage, or a determination under such plan or coverage.

### Prohibited Activities:

- Receive compensation from an insurer, stop-loss insurance or a third-party administrator.
- Receive compensation that is dependent upon, in whole or in part, whether an individual enrolls in or renews coverage in a health benefit plan.
- Provide any information related to enrollment or other insurance products not offered in the federal exchange.

- Make or cause to be made false or misleading statements.
- Provide advice comparing health benefit plans that may be better or worse for the consumer or employer.
- Recommend a particular health benefit plan or insurer or advise consumers or employers regarding a particular insurer or health benefit plan selection.
- Engage in any fraudulent, deceptive or dishonest acts or unfair methods of competition.
- Receive consideration directly or indirectly from any health insurance issuer in connection with the enrollment of individuals or employees into a QHP.

### OCI Health Care Reform FAQs

Frequently Asked Questions (FAQs) relating to health care reform for consumers, employers and insurers have been updated on the OCI Web site. Please visit [oci.wi.gov/healthcare\\_reform.htm](http://oci.wi.gov/healthcare_reform.htm) for the updated FAQ documents.

## National Flood Insurance Program (NFIP)

### by National Association of Insurance Commissioners and OCI Staff

The National Flood Insurance Program (NFIP) was created as a result of the passage of the National Flood Insurance Act of 1968. Congress enacted the NFIP primarily because flood insurance was virtually unavailable from the private insurance markets following frequent widespread flooding along the Mississippi River in the early 1960s. The NFIP is a federal program, managed by the Federal Emergency Management Administration (FEMA) and has three components: to provide flood insurance, to improve floodplain management and to develop maps of flood hazard zones. The NFIP allows property owners in participating communities to buy insurance to protect against flood losses. Participating communities are required to establish management regulations in order to reduce future flood damages. This insurance is intended as an insurance alternative to disaster assistance and reduces the rising costs of repairing damage to buildings and their contents caused by flood. A homeowner is able to purchase excess flood insurance, but they must be covered by NFIP flood insurance first.

On July 6, 2012, the President signed into law the Biggert-Waters Flood Insurance Reform Act of 2012 (BW-12), which reauthorized the NFIP through September 30, 2017, and made a number of reforms aimed at making the program more financially and structurally sound. Over the past year, a few of the provisions of BW-12 have been implemented, while others are being phased in over time. The purpose of the legislation is to change the way the NFIP operates and to raise rates to reflect true flood risk, as well as make the program more financially stable. BW-12 also involves changes regarding how Flood Insurance Rate Map (FIRM) updates impact policyholders. These changes will affect some—but not all—policyholders over time.

The U.S. Senate passed the Homeowner Flood Insurance Affordability Act (H.R. 3370) March 13, 2014. The U.S. House of Representatives passed H.R. 3370 on March 4, 2014. The bill will now be sent to the President for his signature. A copy of H.R. 3370 can be found online at: <http://beta.congress.gov/bill/113th-congress/house-bill/3370>.

## Insurance Marketing Review

Chapter 628, Wis. Stat., on insurance law has three main parts: the licensing of insurance intermediaries, regulation of insurance marketing practices, and compensation of insurance intermediaries. Under the statutes, the term “intermediary” is used to include all the varieties of agency representation of either policyholders or insurance companies in the marketing of insurance. The different classes of “intermediaries” are: intermediary, intermediary-partnerships and corporations, intermediary-surplus lines agents and brokers, managing general agents, reinsurance intermediary brokers and managers, and life settlement brokers.

Wisconsin law places restrictions on combining different intermediary roles in the same transaction.

The licensing of intermediaries is concerned solely with the qualifications of the person applying for the insurance license. The essential requirement is that the insurance intermediary be trustworthy and competent. The competence includes a basic understanding of fundamental insurance law as well as particular knowledge concerning specific statutes and rules.

Wisconsin insurance statutes outline and define the general requirements which the insurance intermediary must follow. Statutory language is expanded and clarified by describing for agents and companies the practices that are allowed and/or prohibited. The standards of professional conduct set out in the statutes and these rules will be strictly enforced by the Commissioner. The language in ch. Ins 20, Wis. Adm. Code, can be found online at [docs.legis.wi.gov/code/admin\\_code/ins/20/Title](http://docs.legis.wi.gov/code/admin_code/ins/20/Title).

### Print Your License

Agents and firms can print a copy of the license on the OCI Web site at [oci.wi.gov](http://oci.wi.gov).

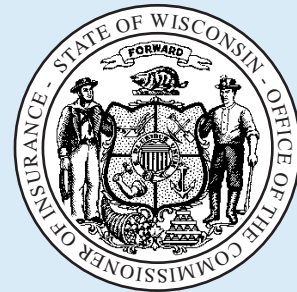
- Click “Print your license” under “How Do I?” / “Apply for an Insurance License”
- Select the “Agent Search” or “Agency Search” tab
- Enter License No.
- Click “Search”
- Click “Print License”



**Governor:**  
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