

2024 Wisconsin Insurance Report



Wisconsin Office of the
COMMISSIONER
OF INSURANCE

Our mission: *To protect and educate Wisconsin consumers by maintaining and promoting a strong insurance industry.*



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Welcome

Past Commissioners

Secretaries of State* Ex Officio Commissioner of Insurance			
Name	Residence	Term Start	Term End
Llewelyn Breese	Prairie du Chien	January 3, 1870	January 5, 1874
Peter Doyle	Prairie du Chien	January 5, 1874	January 7, 1878

Commissioners of Insurance			
Name	Residence	Term Start	Term End
Hans B. Warner	Ellsworth	January 7, 1878	April 1, 1878
Philip L. Spooner	Madison	April 1, 1878	January 3, 1887
Philip Cheek, Jr.	Baraboo	January 3, 1887	January 5, 1891
Wilbur M. Root	Sheboygan	January 5, 1891	January 7, 1895
William A. Fricke	Milwaukee	January 7, 1895	October 15, 1898
Emil Giljohann	Milwaukee	October 15, 1898	January 5, 1903
Zeno M. Host	Milwaukee	January 5, 1903	January 1, 1907
George E. Beedle	Embarrass	January 7, 1907	January 2, 1911
Herman L. Ekern	Whitehall	January 2, 1911	July 1, 1915
M. J. Cleary	Blanchardville	July 1, 1915	April 10, 1919
Plat Whitman	Highland	April 10, 1919	July 17, 1923
W. Stanley Smith	Ashland	July 17, 1923	June 2, 1926
Olaf H. Johnson	Gratiot	June 2, 1926	January 10, 1927
M. A. Freedy	Wauwatosa	January 10, 1927	July 1, 1931
H. J. Mortensen	New Lisbon	July 1, 1931	October 1, 1939
Morvin Duel	Fond du Lac	October 1, 1939	August 8, 1948
J. L. Sonderegger	Madison	October 1, 1948	December 1, 1948
John R. Lange	Madison	December 1, 1948	July 15, 1955
Alfred Van DeZande	Campbellsport	July 15, 1955	November 1, 1955
Paul J. Rogan	Ladysmith	November 1, 1955	July 2, 1959
Charles Manson	Wausau	July 2, 1959	September 15, 1965
Robert D. Haase	Marinette	September 15, 1965	September 7, 1969

Commissioners of Insurance			
Name	Residence	Term Start	Term End
S. C. DuRose	Madison	October 1, 1969	April 8, 1975
Harold R. Wilde	Madison	April 8, 1975	March 18, 1979
Susan M. Mitchell	Madison	March 19, 1979	July 31, 1982
Ann J. Haney	Madison	August 1, 1982	February 28, 1983
Thomas P. Fox	Madison	March 1, 1983	April 27, 1987
Robert D. Haase	Marinette	April 28, 1987	December 31, 1992
Josephine W. Musser	Madison	March 8, 1993	January 2, 1998
Randy Blumer	Madison	January 6, 1998	January 2, 1999
Connie L. O'Connell	Sun Prairie	January 4, 1999	January 6, 2003
Jorge Gomez	Milwaukee	February 17, 2003	December 18, 2006
Sean Dilweg	Madison	January 1, 2007	January 3, 2011
Theodore K. Nickel	Merrill	January 3, 2011	January 20, 2019
Mark Afable	Sun Prairie	January 22, 2019	December 17, 2021
Nathan Houdek	Madison	January 3, 2022	Present

*By chapter 56, section 32, General Laws of 1870, the secretary of state was commissioner of insurance ex officio until 1878. The commissioner of insurance was made an elective office in 1881. In 1911, the commissioner of insurance was changed to an appointed position.



Letter to the Governor

Dear Governor Evers:

As Wisconsin's commissioner of insurance, I am pleased to submit the 2024 Wisconsin Insurance Report as required by 601.46(3) of the Wisconsin Statutes.

The report describes the work of the Wisconsin Office of the Commissioner of Insurance (OCI) over the course of last year. Throughout 2024, OCI carried out our mission to protect and educate Wisconsin consumers while maintaining a strong insurance industry.

We furthered our mission by supporting greater access to health care coverage, improving communication with constituents and insurers, empowering consumers with information and resources related to climate resiliency, and engaging with stakeholders to address changing regulatory and economic landscapes.

This report provides an overview of our work in 2024. We hope you find the report useful.

Respectfully submitted,

Nathan Houdek
Commissioner of Insurance





About OCI

OCI was created by the legislature in 1870 and continues its work today ensuring that the insurance industry meets the insurance needs of Wisconsin citizens. The National Association of Insurance Commissioners (NAIC) was then created in 1871. The NAIC is the national regulatory support organization created and governed by the chief insurance regulators from all 50 states, the District of Columbia, and five U.S. territories. OCI has been a member for over 150 years and collaborates with other state insurance regulators to establish standards and best practices and coordinate regulatory oversight.



Agency Locations Over Time

OCI has been based in several locations in Madison as the agency has grown and our work has modernized over the decades. From 1870 through the 1960s, the agency was located in the Wisconsin State Capitol.

In 1988, the agency was based at 123 W. Washington Ave. and moved to 121 E. Wilson St. by 1989. In 2003, OCI moved from 121 E. Wilson St. to the GEF III building on South Webster Street.

In 2024, OCI was one of the first agencies to move as part of the statewide Vision 2030 plan to reimagine state workplaces and right-size office space to save taxpayer money. OCI was notified of this move in 2023, and the agency began preparations to leave the GEF III building after 20 years in that facility. In the two decades since OCI had last moved, the agency had implemented modern file management practices and utilized new types of IT equipment. The agency created a Relocation Steering Committee and Employee Relocation Working Group to provide input and share information with staff throughout the process and organize staff walk-throughs of the new offices.

The Committee and Working Group members also led various cleaning and packing initiatives. Staff across every division, office, and unit lent a hand to sort through files, identify needed furniture, and prepare IT equipment to move from GEF III to the Administration Building at 101 E. Wilson St. A review of all central files inventory reduced the overall volume of records stored on site by 50%.

In early November 2024, OCI successfully moved to the 8th and 9th floors of the Administration Building after having reduced our physical footprint by nearly 16,000 square feet while maintaining sufficient workspaces for all our staff to continue meeting our regulatory responsibilities.



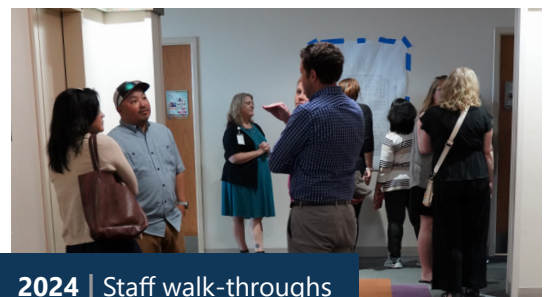
● 1898 | Insurance Department staff



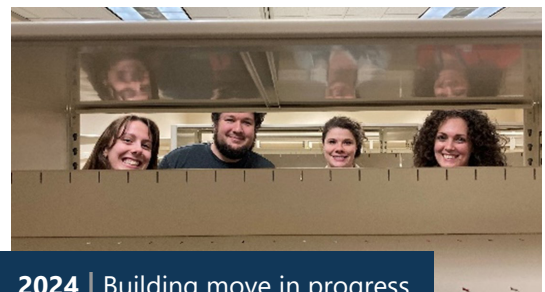
● 2023 | GEF III exterior



● 2024 | Relocation team members



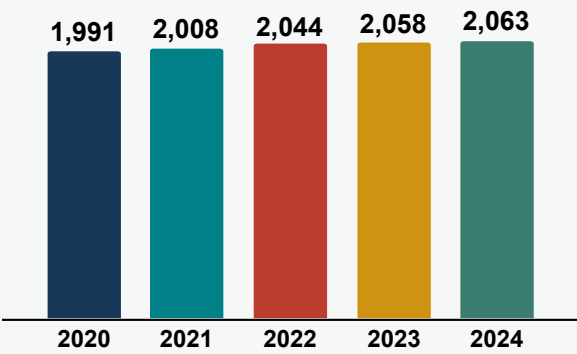
● 2024 | Staff walk-throughs



● 2024 | Building move in progress

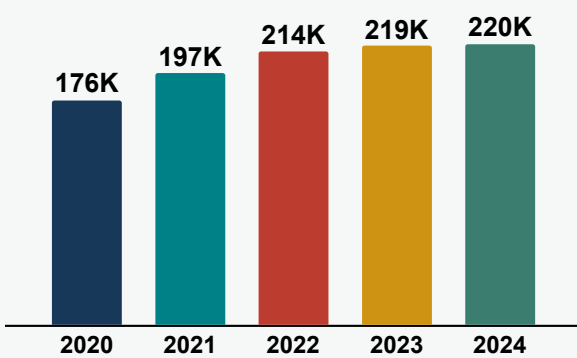
Insurance in Wisconsin

Insurers



In 2024, there were **2,063 insurers** authorized to write business in Wisconsin.

Agents



Wisconsin’s insurance industry is key to our strong economy. There are more than **220,000 agents** licensed to do business in Wisconsin and over 33,000 are Wisconsin residents.



Photo Credit: Hope Kirwan



Over 26k inquiries handled

OCI makes sure that insurance companies follow Wisconsin's laws and regulations, that policyholders get the coverage they have paid for, and that consumers are protected. In 2024, OCI investigated and closed **almost 3,500 written consumer complaints** and handled **23,000 general inquiries** received via email and telephone.

\$117,390 in forfeitures remitted

OCI remitted **\$117,390.18 in forfeitures** to Wisconsin's Common School Fund administered by the Board of Commissioners of Public Lands. Earnings from the Fund are distributed to all public K -12 schools in the state and are used to purchase library materials like books and computers. The Fund distributed \$65 million to Wisconsin public school districts in 2024.

Over \$7 million recovered

OCI assisted complainants in recovering just over **\$7.5 million** for consumers.

Wisconsin Office of the COMMISSIONER of INSURANCE
125 South Webster Street, P.O. Box 7873 | Madison, WI 53707-7873
p: 608-266-2103 | f: 608-264-8115
OCIPBMComplaints@wisconsin.gov | oci.wi.gov

Pharmacy Benefit Manager Complaint Form

The Office of the Commissioner of Insurance (OCI) helps consumers with insurance problems. Please complete this form as thoroughly as you can. Mailing details are on the last page of this form. We will send a copy of your complaint to the company or PBM. They will respond directly to you and tell us what action was taken. In most cases, you will hear from the company in about 25 days from the date you send us your complaint. When we receive information from the company or agent, we will review and decide what action we can take. We will notify you of that decision. If you do not get the resolution you want, you may contact a private attorney for advice. If your complaint involved a claim dispute, you can contact your county's small claims court. **Type or print clearly with a black pen.**

I. Person Filing the Complaint

1. Your Name _____
Business Name _____ (if filing on behalf of a business)
Mailing Address _____
City _____ State _____ Zip Code _____
Email _____
Most correspondence from OCI is sent via email
Phone number where we can reach you between 8 am - 4:30 pm _____

2. I am filing this complaint as:
☐ Insured ☐ Pharmacy ☐ Other (specify) _____

II. Insurance Policy Information

3. Name of Insurance Company (Provide the exact name of the insurance company as it appears on your medical insurance card. Incorrect names will delay the handling of your complaint.) _____
4. Name of Policyholder or Insured _____
5. Name of Member/Dependent (if different than insured) _____
6. Type of Insurance
☐ Individual Health Insurance ☐ Group Health Insurance
If Group, Name of Employer _____
7. Date Policy or Certificate was sold _____ 8. State in which Policy or Certificate was sold _____

III. Pharmacy Benefit Manager Information

Please provide the following information from your pharmacy benefit card.

9. Name of Pharmacy Benefits Manager as it appears on your pharmacy benefit card. _____
10. Rx Group/GRP _____ 11. Member/Dependent ID _____
12. Rx BIN _____ 13. Rx PCN _____

OCI 51-052 (R 12/2021)



Staff Committees

With around 140 employees in 2024, OCI is a small but mighty agency. While our employees contribute to the community through their important day-to-day work, many have also chosen to participate in one of our three employee-led committees that help strengthen our agency's culture and create opportunities for engagement.





OCI Gives Back

The OCI Gives Back Committee organizes blood drives, school supply drives, and other events that help our staff contribute to important causes. The committee members also plan and execute the annual Partners in Giving campaign, an enterprise-wide effort that encourages state employees to contribute to impactful nonprofits across the state. Thanks to their dedicated work, OCI earned recognition for our high level of staff participation and generous giving during the campaign in 2022 and 2023. In the midst of our agency's move to a new building, our Partners in Giving chairs ensured another successful year in 2024, raising \$14,146.59, an 18% increase from the prior year.





Wellness Committee

The Wellness Committee's mission is to inspire, create, and maintain an environment that supports each staff member's wellness. Committee members share resources, promote wellness programs and initiatives, and educate employees on relevant health and wellness topics.



Administration of the Office

Organizational Structure

OCI is organized into two divisions, two offices, and two units: the Division of Financial Regulation and the Division of Market Regulation and Enforcement; the Office of Administrative Services and the Office of Operational Management; and the Public Affairs and Legal units.

Division of Financial Regulation

The Division of Financial Regulation (DFR) is responsible for monitoring the financial solvency of insurers licensed to do business in Wisconsin. DFR conducts financial examinations of domestic insurers' operations, financial analysis on all licensed insurers, administers insurer rehabilitations and liquidations, audits and collects insurer premium taxes and fees, licenses insurance companies, reviews holding company transactions, reviews change of control transactions, and collects funds from insurers under the fire department dues program. Along with the Division of Market Regulation and Enforcement, this division has a major role in the agency's participation in the National Association of Insurance Commissioners (NAIC.)

Division of Market Regulation and Enforcement

The Division of Market Regulation and Enforcement (DMR) performs market conduct examinations and market analysis of licensed insurers, determines compliance with applicable laws and rules, handles consumer contacts and consumer complaints about licensees, initiates administrative actions against licensees who violate Wisconsin's insurance laws, staffs several risk-sharing plans, investigates agent activities, and administers the insurance licensing and continuing education program. DMR also processes, reviews, and, when applicable, approves all rate and form

filings, as well as processes Vehicle Protect Plans and Warranties.

The Division of Market Regulation and Enforcement is also responsible for establishing and enforcing rate filing requirements, reviewing comprehensive individual and small group rate filings, and monitoring trends in the Wisconsin comprehensive health insurance marketplace. Along with the Division of Financial Regulation, this division plays a major role in the agency's participation in NAIC.

The Office of Administrative Services

The Office of Administrative Services is responsible for administrative functions within OCI. This includes serving as a liaison between the agency and the Department of Administration, Division of Personnel Management, for staff development and human resource services. This Office is also responsible for the Central File and Reception Unit, which includes records management and training, and provides administrative services to the Injured Patients and Families Compensation Fund and the State Life Insurance Fund.

The Office of Operational Management

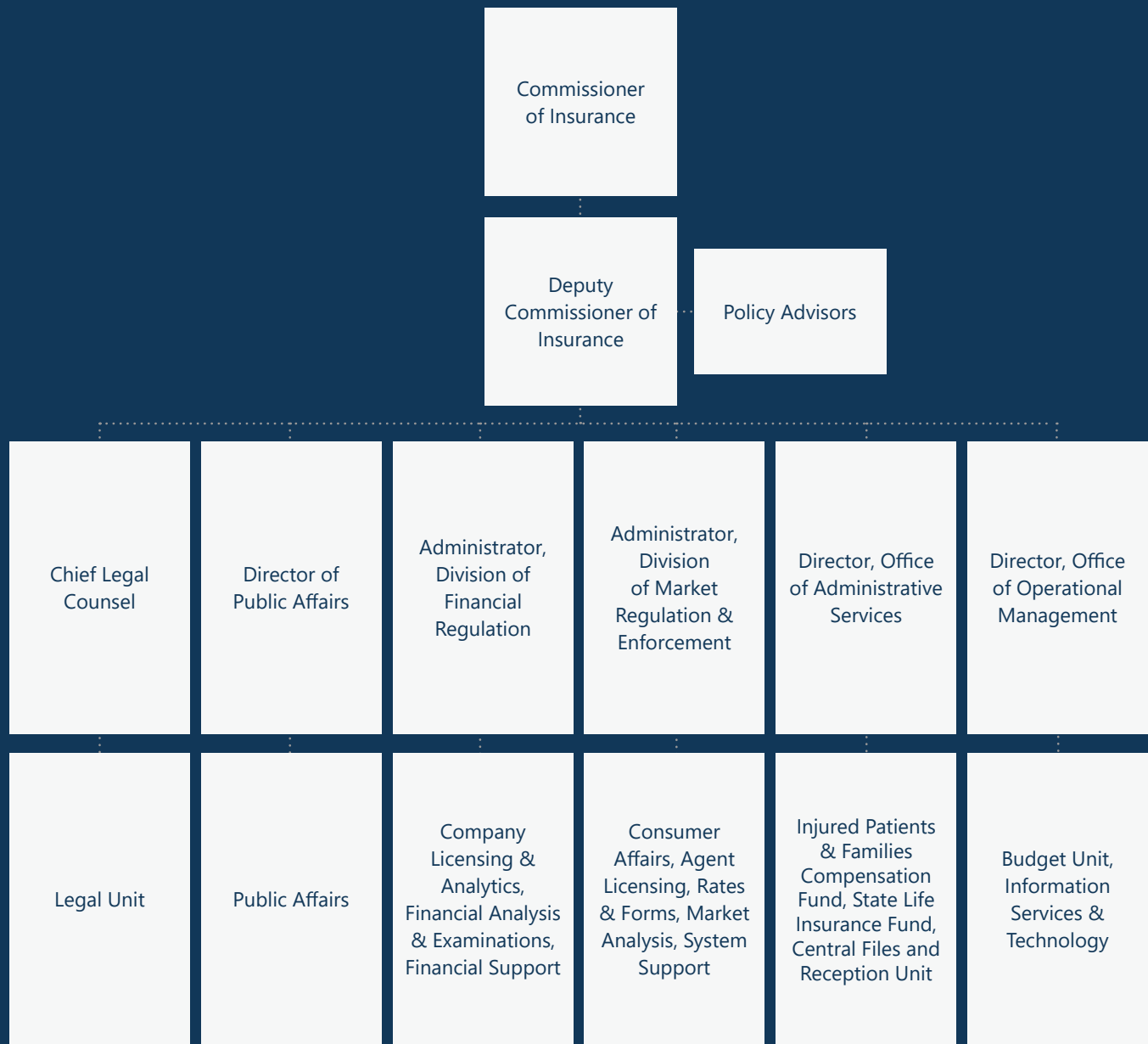
The Office of Operational Management is responsible for operational functions of the agency, including project management, budget, accounting, facilities management, and serving as a liaison between the agency and the Department of Administration, Division of Enterprise Technology for IT services and support.

Legal Unit

The Legal Unit represents the agency in administrative procedures, provides legal advice to staff, represents or supervises representation of the agency in litigation and insurance company receiverships, and develops legislative proposals and administrative rules. It provides legal services for the Injured Patients and Families Compensation Fund, Wisconsin Health Care Liability Insurance Plan, and State Life Insurance Fund.

Public Affairs Unit

The Public Affairs Unit provides advice on executive matters affecting the agency's goals and initiatives including directing the agency's legislative initiatives and communications activities. This unit uses a variety of communication tools to engage and educate consumers on insurance issues.





Nathan Houdek

Commissioner of Insurance,
January 2022

Deputy Commissioner of
Insurance, January 2019 –
December 2021

Nathan Houdek served as Deputy Commissioner of Insurance from January 2019 until his appointment by Governor Tony Evers as Commissioner of Insurance in January 2022.

Nathan has spent over 20 years working in state legislative and regulatory affairs. He has extensive experience dealing with issues across all lines of insurance and engaging with a variety of stakeholders to find solutions to complex public policy and regulatory challenges. He has held several senior-level roles in the public and private sectors, including serving as a principal at one of Wisconsin's largest public affairs and business consulting firms and as chief of staff to the former minority leader in the Wisconsin State Senate.

Commissioner Houdek grew up in northern Wisconsin and earned his BA and MBA degrees from the University of Wisconsin-Madison.

Rebecca Easland

Deputy Commissioner of Insurance, January 2024

Rebecca Easland is the Deputy Commissioner of Insurance at OCI. As Deputy Commissioner, Rebecca is responsible for the overall operations of OCI and actively participates in NAIC activities and engagement with stakeholders.

Rebecca returned to OCI in January 2024 after serving as Senior Policy Advisor with the International Association of Insurance Supervisors (IAIS). During her time with IAIS, she assisted in the development of the global Insurance Capital Standard, worked with the Macroprudential Committee, and provided project management support to the Policy Development Committee. Before her time at IAIS, Rebecca had worked at OCI for over 15 years as a financial examiner and served as the Director of the Financial Analysis and

Examination Bureau.

Rebecca has a Bachelor of Science in Accounting from Upper Iowa University. She is also a Certified Public Accountant and, formerly, a Certified Financial Examiner through the Society of Financial Examiners. In 2024, Rebecca earned the designation of Associate Professional in Insurance Regulation from the National Association of Insurance Commissioners.

Lauren U. Van Buren

Lauren U. Van Buren was appointed Chief Legal Counsel in January 2023. Lauren served as an attorney at OCI for over five years, prosecuting administrative actions with a focus on financial advisor fraud, securities fraud, and life insurance suitability. She is active with the National Association of Insurance Commissioners, with a focus on the use of big data and artificial intelligence.

She holds a bachelor's degree from the University of Wisconsin-Madison and a law degree from the University of Hawai'i at Manoa.

Amy Malm

Amy Malm is the Administrator for the Division of Financial Regulation at OCI. Since 2017, Amy has served as the bureau director of financial regulation. She is responsible for overseeing company licensing, financial analysis and examinations, and the solvency of insurers licensed to do business in Wisconsin. Amy started at OCI in 2001 as a financial examiner.

Before joining OCI, Amy was a revenue agent with the Wisconsin Department of Revenue in the Delinquent Tax Unit, assisting taxpayers in resolving past-due taxes. Amy also has experience working in the private sector as an accounting assistant for a home health agency while obtaining her degree.

Amy has a Bachelor of Science in Accounting from Upper Iowa University. She is also a Certified Public Accountant, Certified Financial Examiner through the Society of Financial Examiners, and

an Associate in Risk Management – Enterprise-wide Risk Management. In 2021, Amy earned the designation of Professional in Insurance Regulation from the National Association of Insurance Commissioners. Amy serves as a member of several NAIC committees.

Rebecca Rebholz

Rebecca Rebholz is the Administrator for the Division of Market Regulation and Enforcement at OCI. Rebecca is responsible for the day-to-day administration of the Division of Market Regulation and Enforcement. This includes market analysis, industry and consumer issues, rate and forms filings, as well as the agent testing and licensing process. Before her current role, she served as the OCI Bureau Director of Market Regulation since August 2016. Rebecca worked as an examiner and a senior examiner in the Property and Casualty Section of Regulation and Enforcement at OCI for 17 years. Rebecca is also active with the NAIC.

Rebecca holds an associate degree in Computer Programming/System Analysis from Madison College, a Bachelor of Arts in Political Science, and a law degree from the University of Wisconsin–Madison.

Sarah Smith

Sarah Smith is the Director of Public Affairs at OCI. She is responsible for overseeing communications, public outreach, and legislative affairs.

Sarah earned a Bachelor of Arts in History as well as a Master of Science in Educational Policy from the University of Wisconsin–Madison. Before joining OCI, Sarah was the Communications Director for Senator Patty Schachtner and previously served as the Chief of Staff to State Treasurer Sarah Godlewski.

Lilian Kahite

Lilian Kahite is the Director of the Office of Operational Management. She is responsible for overseeing all the agency's IT, budget, and accounting functions. She has over 16 years of

state service working in accounting and auditor roles at various state agencies and has spent the past nine years with OCI as the agency accountant supporting the various operational divisions. Lilian has an Associate degree in Applied Sciences in Accounting, a Bachelor of Science degree in Accounting, and a Master of Science degree with a concentration in accounting.

Kristina Thole

Kristina Thole is the Director of the Office of Administrative Services. Kristina is the key contact for all OCI employees as their human resources liaison. She is responsible for all personnel management and human resources processes, policies, and procedures. In close coordination with the fund managers, she supervises and administers the direction of the State Life Insurance Fund and the Injured Patients and Families Compensation Fund. She is responsible for the administrative support staff and other administrative functions.

Prior to joining OCI, Kristina worked at the Department of Administration in the Division of Personnel Management (and its predecessor the Office of State Employment Relations), for over nine years. She has significant experience with HR policy interpretation, development, and implementation, as well as in recruitment and selection activities. Before joining the State of Wisconsin, she worked in HR in the private sector in the insurance and health care industries.

Kristina holds the Senior Professional in Human Resources (SPHR) designation. She earned a Bachelor of Arts in Communication with a minor in English from the University of Wisconsin–Milwaukee.

Office Finances

General Fund—Supervision of the Insurance Industry
Fiscal Year 2024 (Amounts in \$000s)

	Total Revenue	Retained by Office of the Commissioner of Insurance	Transferred to State's General Purpose & Other Revenue Funds ¹
Premium Taxes	\$242,644		\$242,644
Fire Department Dues	33,850		33,850
Forfeitures	117		117
Insurance Company Examination Charges	8,130	8,130	-
Resident/Nonresident Appt Billings and Renewals	36,366	36,366	-
Agent Continuing Education Fees	0	0	-
Resident/Nonresident Producer License Issuance	1,350	1,350	-
Resident/Nonresident Biennial License Renewals	9,654	9,654	-
Reinstatements	0	0	-
Other Licensing Fees	85	85	-
Company Licenses, Admissions, and Renewals	146	146	-
Miscellaneous ²	<u>35</u>	<u>35</u>	<u>-</u>
Total Revenue	<u>\$332,377</u>	55,766	<u>\$276,611</u>
Less Total Operating Expenditures		<u>21,428</u>	
Net Operating Revenue / (Loss)		34,338	
Cash Lapse to State's General Fund (Transfer Out)		<u>(34,018)</u>	
Net Change in Fund Equity		<u>\$ 320</u>	

¹The Office of the Commissioner of Insurance retains all revenue from licenses, services, and various other items. Taxes are remitted to the State of Wisconsin General Purpose Revenue Fund. Fire Department Dues are remitted to Wisconsin Fire Departments. Forfeitures are remitted to the Common School Fund.

² Miscellaneous collections include: 1) Photocopying, 2) Service of process, and 3) Publications.

Segregated Funds
Fiscal Year 2024 (Amounts in \$000s)

	Total Revenue	Operating Expenses	Net Revenue
Injured Patients & Family Compensation Fund	\$99,338	\$98,946	\$392 ³
State Life Insurance Fund	1,664	6,314	(4,651) ⁴

³The Fund experienced improved investment and interest income results due to the easing of inflationary pressure and equity returns in the stock market.

⁴Due to an increase in dividend payments to policyholders over the prior year.





Executive Initiatives

Regulatory Developments and Trends

Industry Changes

In 2024, the insurance industry continued to experience a changing market as inflationary pressures and supply chain challenges impacted insurance costs alongside more frequent and severe weather-related disasters.

Federal COVID-19 Laws

President Joe Biden signed the American Rescue Plan Act (ARPA), a stimulus bill to aid public health and economic recovery from the COVID-19 pandemic, on March 11, 2021. The \$1.9 trillion plan included \$350 billion in emergency funding for state, local, territorial, and tribal governments,

known as the Coronavirus State and Local Fiscal Recovery Funds. ARPA extended eligibility for Affordable Care Act (ACA) health insurance subsidies to people buying their own health coverage on the HealthCare.gov Marketplace who have incomes over 400% of the federal poverty line. The law also increased the amount of financial assistance for people with lower incomes who were already eligible under the ACA. Both provisions lasted through the end of 2022. In August 2022, the Inflation Reduction Act was passed into law, which extended the ARPA subsidy changes through 2025 and continued to impact consumers on the individual health insurance market in 2024.

Advisory Boards, Committees, and Councils

Wisconsin law, s. 15.04, Wis. Stat., provides that heads of independent agencies may create and appoint such councils and committees as the operation of the agency requires. Insurance law, s. 601.20, Wis. Stat., authorizes the commissioner to



create advisory councils and committees to assist in dealing with regulatory issues.

The commissioner is to provide, by rule, for the creation, governance, duties, and termination of any council or committee that is established. The expert advice provided to the commissioner through these councils results in more efficient regulation of the insurance industry to the benefit of insurance consumers and insurers.

The commissioner and staff members also serve on various councils and boards, aiding Wisconsin residents by providing advice and suggestions on matters related to insurance regulation.

OCI is involved with the following boards, committees, and councils (listed alphabetically):

Birth to 3 Program Interagency Coordinating Council

The Wisconsin Birth to 3 Program Interagency Coordinating Council (ICC) was established by the Governor of Wisconsin to advise and assist

the Department of Health Services (DHS) in the performance of the responsibilities established under Part C of the Individuals with Disabilities Education Act. ICC's mission is to advise, review, analyze, and monitor the implementation of the state's early intervention system, maintain a forum for communication relative to early intervention, and make recommendations to DHS regarding the effective implementation of the early intervention system.

Governor's Committee for People with Disabilities

In 1948, a governor's committee was established to improve employment opportunities for people with disabilities. The group's mission was broadened in 1976 to cover many aspects of disability in Wisconsin, and the group became the Governor's Committee for People with Disabilities which is dedicated to enhancing the health and general well-being of disabled citizens in Wisconsin. The committee consists of the lieutenant governor and not more than 20

other members, including six members appointed from specific statutory councils: the Council on Blindness, the Council for the Deaf and Hard of Hearing, the Council on Developmental Disabilities, the Council on Mental Health, the Council on Alcohol and other Drug abuse, and the Council on Physical Disabilities. The majority of members are people with disabilities.



Governor's Council on Financial Literacy and Capability

Governor Tony Evers created the [Governor's Council on Financial Literacy and Capability](#) by signing [Executive Order #106](#) on February 8, 2021. The order renamed the existing [Governor's Council on Financial Literacy](#) and expanded its mission to include helping Wisconsinites build financial capability and

identifying ways to improve the financial inclusion of all Wisconsin residents. In addition, the order increased the council's membership from 25 to 35 members bolstering the council's expertise in the areas of financial capability and inclusion.

Governor's Task Force on Reducing Prescription Drug Prices

The first meeting of the [Governor's Task Force on Reducing Prescription Drug Prices](#) was held on November 20, 2019. Governor Tony Evers created the task force through Executive Order #39 and charged the task force with making recommendations for reducing prescription drug prices in Wisconsin. OCI leads the work of the task force and Commissioner Houdek serves as the task force chair.

Throughout 2020, the task force held a series of meetings and analyzed information relating to the development, pricing, distribution, and purchasing of prescription drugs; reviewed actions taken by Wisconsin and other states to reduce prescription drug prices; and identified opportunities to coordinate with other states and the federal government. The final report, including recommendations for strategies and policies to help lower prescription drug costs for consumers, was submitted to Governor Evers in the fall of 2020. The task force did not meet in 2024, but task force members and interested parties continue to support and advance the recommended proposals.

Group Insurance Board

Section 15.165 (2), Wis. Stat., created an 11-member Group Insurance Board in the Department of Employee Trust Funds. The commissioner or designee is a member of the board. The Group Insurance Board is authorized to enter into contracts with insurers to provide group insurance plans or to provide benefits on a self-insured basis for Wisconsin state and other public employees and retirees. It also provides general administrative policy for the group insurance programs for health care, income disability benefits, and life insurance authorized for state and other public employees under ch. 40, Wis. Stat.

The specific powers of the board are enumerated under s. 40.03 (6), Wis. Stat. The board generally meets at least four times per year.

Health and Life Insurance Advisory Council

The Health and Life Insurance Advisory Council advises the commissioner on regulatory matters in the area of health and life insurance. The council meets on an as-needed basis. The members are appointed by the commissioner and include six members representing insurers, three members representing insurance agents, one representing small business, and one consumer advocate.

Injured Patients and Families Compensation Fund Board

The Injured Patients and Families Compensation Fund (Fund) was created in 1975 to provide medical malpractice insurance for Wisconsin health care providers in excess of the provider's primary limits of coverage. The Fund provides coverage in excess of the primary limit established by statute, which is currently \$1 million per occurrence and \$3 million aggregate per year. Participation in the Fund is mandatory for health care providers as defined by Chapter 655, Wis. Stat.

OCI provides administrative support for the Fund's operations. The Fund is governed by a 13-member Board of Governors, which is chaired by the commissioner of insurance. The Board is comprised of four public members appointed by the governor, three insurance industry representatives, a member named by the Wisconsin Association for Justice, a member named by the State Bar of Wisconsin, two members named by the Wisconsin Medical Society, and a member named by the Wisconsin Hospital Association. The board and its committees meet quarterly.

Fiscal Year 2024 Board of Governors (as of June 30, 2024):

Rebecca Easland, Deputy Commissioner of Insurance (Board Chair)

Carla Borda, Public Member
Hammad Haider-Shah, M.D., Public Member
Vacancy 1, Public Member
Vacancy 2, Public Member
Susan Forray, Industry Representative
David Maurer, Industry Representative
Vacancy 1, Industry Representative
Daniel Rottier, Wisconsin Association for Justice (deceased January 2025)
Jerome Hierseman, State Bar of Wisconsin
Bud Chumbley, M.D., Wisconsin Medical Society
Timothy Crummy, M.D., Wisconsin Medical Society
Matthew Stanford, Wisconsin Hospital Association

The following committees and a council support the Fund's governance:

Actuarial and Underwriting Committee
Legal Committee
Claims Committee
Finance/Investment/Audit Committee
Risk Management and Patient Safety Committee
Peer Review Council

Insurance Security Fund Board

This board administers the Insurance Security Fund established by ch. 646, Wis. Stat., to provide a mechanism for protecting insureds in the event of liquidation of insurers and to assess the cost of such protection among insurers. The commissioner, along with the attorney general and the state treasurer, are members of this board and serve with representatives of insurers appointed by the commissioner upon consideration of the recommendation of insurance organizations.

Joint Enforcement Task Force on Payroll Fraud and Worker Misclassification

This task force was formed in 2019 by Governor Evers' Executive Order #20 to facilitate coordination of the investigation and enforcement of worker misclassification matters by the Department of Workforce Development, Department of Revenue, the Office of the Commissioner of Insurance, the Department of Justice, and other relevant agencies.



Joint Survey Committee on Retirement Systems

This committee performs duties mandated under s. 13.50, Wis. Stat. The committee is comprised of two majority party senators, one minority party senator, two majority party representatives to the assembly, one minority party representative to the assembly, an assistant attorney general, a member of the public selected by the governor, the commissioner or a designated experienced actuary at OCI, and the Secretary of the Department of Employee Trust Funds.

This committee evaluates all legislative proposals that would create or modify any system of retirement for public officers or employees. No such legislative proposal may be acted upon by the legislature until it has been referred to this committee for the preparation of a written report. The report must indicate the probable cost involved, the effect of the proposal on the actuarial soundness of existing retirement systems, and the desirability of the proposal as a matter of public policy.

OCI-DHS Health Care Coverage Partnership Advisory Council

In June 2019, Governor Tony Evers announced the formation of the [Health Care Coverage Partnership](#), directing the Office of the Commissioner of Insurance and the Department of Health Services (DHS) to develop strategies aimed at enrolling more Wisconsinites in high-quality, affordable health insurance coverage. The partnership consists of three primary workgroups: Marketing, Data, and Workforce and Capacity. It also coordinates with the Regional Enrollment Networks to share information, coordinate messaging, and support health insurance enrollment efforts.

Property and Casualty Advisory Council

This council, created by s. Ins 6.79, Wis. Adm. Code, advises the commissioner on regulatory matters in the areas of property and casualty insurance. The council meets on an as-needed basis and consists of four insurance company members, three agent members, and one public member, appointed by the commissioner. This council met twice in 2024.

Retirement Research Committee

This committee performs duties mandated under s. 13.51, Wis. Stat. Its membership represents employee and employer groups having vested interests in various state retirement programs. The committee has investigatory powers over all state retirement systems for public employees. In addition, it may require any public pension or retirement system to furnish it with periodic financial reports and records. The committee conducts a continuous review of retirement benefits afforded to public employees under the existing state system. It maintains a current reference library of all public employee pension and retirement plans throughout the United States and makes its findings and recommendations available to the governor and legislature.

Wisconsin Insurance Plan Governing Committee

The Wisconsin Insurance Plan is a risk-sharing plan for property insurance companies created by s. Ins 4.10, Wis. Adm. Code. The purpose of the plan is to help qualified property owners obtain insurance coverage if they are unable to find adequate coverage in the private market. The plan is overseen by a governing committee subject to the supervision of the commissioner of insurance. The governing committee consists of insurer representatives, insurance agents, and public members. The commissioner of insurance appoints the agents and the public members and selects a liaison to attend meetings. Six of the insurer representatives are selected by trade associations. One is elected by insurers who are not members of these trade associations.

Wisconsin Partnership Program Oversight and Advisory Committee

The Wisconsin Partnership Program's Oversight Advisory Committee is a nine-member panel including representatives of urban and rural areas, the Office of the Wisconsin Commissioner of Insurance, and the University of Wisconsin School of Medicine and Public Health.

The primary responsibilities of the committee are to direct and approve funds for public health initiatives, provide public representation through the Oversight and Advisory Committee's four community members, and comment and advise on expenditures of the Partnership Education and Research Committee.

Wisconsin Retirement Board

The nine-member board is created in the Department of Employee Trust Funds by s. 15.165 (3) (b), Wis. Stat. Six members represent employers or employees who participate in the Wisconsin retirement system, one is a participating state employee, one is a public member, and one is the commissioner or an OCI designee. The board studies and recommends alternative administrative policies, authorizes and terminates disability annuity payments, and considers administrative rules that relate to participants in the retirement system other than teachers.

Wisconsin State Council on Alcohol and Other Drug Abuse

The council was created in the Office of the Governor in August 1970 to provide leadership and coordination regarding alcohol and other drug abuse (AODA) issues confronting the state. Wisconsin Act 210 was enacted on April 6, 1994, merging the Citizens Council on Alcohol and Other Drug Abuse with the state council. The bill expanded the duties and the membership of the state council.

The State Council on Alcohol and Other Drug Abuse recommends, coordinates, and reviews efforts of state agencies to control and prevent alcohol and drug abuse. It evaluates program effectiveness, recommends improved programming, issues reports that educate people about the dangers of drug abuse and allocates responsibility for various alcohol and drug abuse programs among state agencies.

The 22-member council consists of the governor, the attorney general, the superintendent of the Department of Public Instruction, the secretary

of the Department of Health Services, the commissioner of insurance, the secretary of the Department of Corrections, the secretary of the Department of Transportation, and the chairperson of the Pharmacy Examining Board, or their designees; a representative of the controlled substances board; a representative of any governor's committee or commission created under subch. I of ch. 14 to study law enforcement issues; six members (one of whom is a consumer representing the public at large) with demonstrated professional, research, or personal interest in alcohol and other drug abuse problems, appointed for four-year terms; a representative of an organization or agency which is a direct provider of services to alcoholics and other drug abusers; a member of the Wisconsin County Human Service Association, Inc., who is nominated by that association; and two members of each house of the legislature, representing the majority party and the minority party in each house.

Worker's Compensation Research Institute (WCRI) CompScope™ Benchmark Study Advisory Committee for Wisconsin

The CompScope™ WCRI's multistate benchmarking program measures and benchmarks the performance of a growing number of state worker's compensation systems. This program provides annually the opportunity both to examine the changes in the performance of individual state systems and to make meaningful interstate comparisons. The CompScope™ program is funded by employers, insurers, state funds, state governments, rating organizations, and a labor organization seeking to help achieve a more stable and equitable worker's compensation system. OCI is a member of the advisory committee.





National Association of Insurance Commissioners Activities

OCI actively participates in the National Association of Insurance Commissioners (NAIC). Throughout 2024, Commissioner Nathan Houdek and other OCI staff who served as the Commissioner's designee were members of the following NAIC committees, task forces, working groups, and subgroups.

Letter Committees

Life Insurance And Annuities (A) Committee
Financial Condition (E) Committee *Chair, Nathan Houdek*

EX Committee Groups and Task Forces

Climate and Resiliency (EX) Task Force
Special (EX) Committee on Race and Insurance

Task Forces

Long-Term Care Insurance (B) Task Force
Regulatory Framework (B) Task Force
Senior Issues (B) Task Force
Antifraud (D) Task Force
Market Information Systems (D) Task Force
Producer Licensing (D) Task Force
Accounting Practices and Procedures (E) Task Force
Capital Adequacy (E) Task Force
Examination Oversight (E) Task Force
Financial Stability (E) Task Force
Receivership and Insolvency (E) Task Force
Reinsurance (E) Task Force
Valuation of Securities (E) Task Force

Liaison Committees and Boards

NAIC/Consumer Liaison Committee
NAIC/American Indian and Alaska Native Liaison Committee





Understanding Financial Notification

The Injured Patients & Families Compensation Fund (IPFCF) dual notification for Fund participants that are also affiliated with an employer. This means that the licensed medical provider is outlined in Wisconsin Statute 655 will be able to monitor an employer or group is managing their IPFCF compliance.

Financial Correspondence

Each Fund participant and their affiliated employer or group notification when each quarterly IPFCF invoice is general planned for the following dates each fiscal year and are a participant's IPFCF Provider Portal account and on the account.

Quarter 1: July 1st
Quarter 2: October 1st
Quarter 3: January 1st
Quarter 4: April 1st

If the Fund participant has verified within the IPFCF system the employer or group that is responsible for their IPFCF action would be needed following the quarterly invoice.

After each quarterly invoice is generated the Fund participant or group has 30 days to make the minimum quarterly payment received by the due date indicated on the invoice a past due notice. An email notification will be sent to each Fund participant or group. To access the actual past due notice to log onto their IPFCF Provider Portal account, or the IPFCF Provider Portal account.

At this point it is in the Fund participant's best interest to be responsible for their payment to determine if there is an issue sent.

How to Verify Your Email Address in the IPFCF System

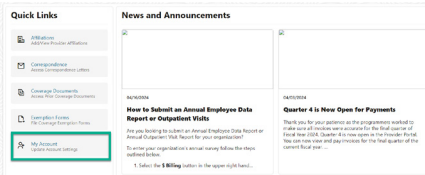
The Injured Patients & Families Compensation Fund (IPFCF or the "Fund") uses email as the primary source of communication with each Fund participant. To ensure that each Fund participant can maintain their IPFCF compliance they should always have a personal nonwork email address on file with the IPFCF.

It is important to use a personal nonwork email address because it prevents missed notifications for the licensed Fund participant regardless of work location or employer.

Having a personal nonwork email address on record with the IPFCF does not prevent an employer or group administrator from being able to gain access to the Fund participant's IPFCF correspondence and invoices if that is desired.

To verify what email address is currently on record with the IPFCF the Fund participant should log onto their IPFCF Provider Portal account here: <https://ipfcfsecure.oci.wi.gov/>.

Once the provider has logged onto their account they will be taken to the Portal Home page. From the Home page you will select the **My Account** button on the left side of the screen.



On the My Account screen you can view the email address that is on file with the IPFCF as well as your current account status.

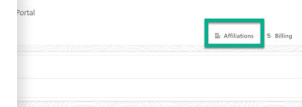
Employer Affiliation in the IPFCF System

The administrator is responsible for paying for your Injured Patients & Families Compensation Fund (IPFCF or the "Fund") Annual Assessment, or you are affiliated with your employer's IPFCF group.

There are two different ways.

Provider Portal Account here:

Click the **Affiliations** button at the top of the screen.



News and Announcements

You will see your current employer or group if you are linked to your past two employers or groups if applicable.

With your employer or group's IPFCF account, you will see the due date only. If there is an expiration date displayed, you are no longer or group any longer.

Continuous Process Improvement Initiatives

The Wisconsin Continuous Improvement Program provides agencies the freedom to implement the models of continuous improvement that are most appropriate for their agency so they can better support improvement efforts internally. OCI incorporates process improvement into everyday activities and all agency projects.

Injured Patients and Families Compensation Fund Project

The Injured Patients and Families Compensation Fund implemented its new policy administration and claims system (OIPA) platform in 2023. This system was created with the objective to handle tasks such as policy reporting, premium billing, policy changes, and claims processing. As we worked to implement the system, we aimed to streamline Fund's workflow, improve efficiency,

and enhance customer service by automating various processes and providing centralized access to policy and claims information.

Agency Data Project

The Agency Data Project started in late 2020. Phase One of the project was completed in June 2022, and efficiency increased by eliminating manual steps and using access databases and spreadsheets for the Compulsory Surplus filings and the Wisconsin Insurance Report. Phase Two of the project started in July 2022 and planned to enhance the process of downloading data from external sources, including NAIC data that is used to monitor the financial condition of licensed insurers and reduce manual entry for calculating the annual examination assessment. The project also aimed to eliminate manual steps used to access the external data. Phase two of the project concluded with the 2025 assessment issued on February 1, 2025.

Bulletins to Insurers

OCI publishes bulletins to provide information or interpretations about insurance regulations. The bulletins are issued to explain new regulations or discuss interpretations enforced by OCI. OCI issued six bulletins to insurers in 2024.

February 21, 2024

[Out-of-State Health Insurance Brokers](#)

This bulletin reminds agents, brokers, and health insurers to take all reasonable steps necessary to ensure that the terms of prospective plans are accurately described and that these plans are suitable to the applicant. Such steps include, on the part of health insurers, ensuring that the insurance intermediaries with which they contract adhere to all applicable insurance laws and regulations.

March 14, 2024

[Change Healthcare Cyber Attack Impacts and Response](#)

OCI issued this bulletin stating the agency has been monitoring the impact of the February 21, 2024, cybersecurity attack on Change Healthcare.

OCI directed each health insurer and pharmacy benefit manager (PBM) operating in Wisconsin that has been impacted by this cyber disruption to provide prompt assistance to consumers and health care providers to limit interruptions to access of health care services and prescriptions.

May 2, 2024

[Insurance Omnibus Law \(2023 Wisconsin Act 212\)](#)

This bulletin summarizes a recently enacted law that impacts the insurance industry. The Wisconsin Office of the Commissioner of Insurance (OCI) is providing this summary to make insurers, agents, and interested parties aware of the changes. On March 22, 2024, an insurance omnibus law, 2023 Wisconsin Act 212, was enacted that makes various technical changes to the insurance statutes.

October 8, 2024

[New OCI Street Address](#)

OCI issued this bulletin reminding insurers, agents,

and other licensees of our move to a new location (the Administration Building) on November 4, 2024. The bulletin noted that parties are expected to provide accurate, up-to-date contact information for OCI on policy forms, policyholder notices, public adjuster contracts, and other documents as required by some state statutes or administrative codes. Licensees should ensure that they remain in compliance by updating OCI's street address anywhere our previous street address appeared. Licensees are also encouraged to review their websites and other locations where OCI's street address may appear.

November 14, 2024

[Wisconsin Agent Appointment Renewal Invoices due 2025](#)

OCI will process all company appointments electronically through the National Insurance Producer Registry (NIPR). The appointment renewal invoice will include all resident/nonresident appointment renewals. All agents will appear on the renewal list unless the agent was terminated by 11:59 p.m. CST on December 31, 2024.

December 19, 2024

[Agent Terminations for Cause](#)

OCI issued this bulletin reminding insurance companies to report all agent appointments and terminations to the commissioner at intervals established by rule. Insurers must submit notice of agent terminations within 30 calendar days of the termination date in a manner prescribed by the commissioner. To meet these requirements, insurers must submit notice of agent terminations electronically through nipr.com or an NIPR-authorized business partner. This applies even if the agent has also been reported for fraud through the OFRS portal.

Legislation

In 2024, Governor Evers signed legislation affecting the insurance business in Wisconsin. Legislative materials may be found online at legis.wisconsin.gov and may also be obtained from the Wisconsin Legislative Council at lc.legis.wisconsin.gov or by calling (608) 266-1307.

2023 Wisconsin Act 87

Licensure of Dental Therapists

2023 Wisconsin Act 87 permits dental therapists to provide dental therapy services only as an employee of certain specified employers and only under the supervision of a dentist who is either similarly employed or who directly employs the dental therapist. The dental therapist must have a collaborative management agreement with a dentist that addresses various aspects of the dental therapist's practice and supervision, including, among other things, practice setting, conditions or limitations on services that may be provided, a quality assurance plan, and various other protocols.

Subject to the terms of a collaborative management agreement and what was covered in their dental therapy education programs, dental therapists are limited to providing services, treatments, and procedures that are specified in the act, as well as additional services, treatments, or procedures specified by the board by rule.

Dental therapists may initially provide dental therapy services only under the direct or indirect supervision of a qualifying dentist. Once a dental therapist is licensed and has provided dental therapy services for at least 2,000 hours, the dental therapist may provide services under the general supervision of a qualifying dentist. However, the level of supervision for a dental therapist may be further limited under the terms of a collaborative management agreement. Dental therapists must also either limit their practice to federally defined dental shortage areas or practice in settings where at least 50% of their patient base consists of patients who are any of the following:

- Medical Assistance patients.
- Uninsured patients.
- Patients receiving dental care at free and charitable clinics.
- Patients receiving dental care at federally qualified health centers.
- Patients who reside in long-term care facilities.
- Veterans.
- Patients who are members of a federally recognized Indian tribe or band.
- Patients receiving dental care at clinics or facilities located on tribal lands.
- Patients with medical disabilities or chronic conditions that create barriers of access to dental care.

The changes in this Act became effective on February 2, 2024

McCarthy, S. (2024, February 7). Wisconsin Legislative Council Act Memo, 2024 Wisconsin Act87

<https://docs.legis.wisconsin.gov/2023/related/lcactmemo/act087.pdf>

2023 Wisconsin Act 91

Assignment of Dental Benefits Under Health Insurance

2023 Wisconsin Act 91 permits an insured individual to assign the right to receive reimbursement for dental care and related services under a limited-scope dental benefit directly to a provider of dental care or related services.

An insured individual may revoke an assignment at any time.

Under the act, if the right to receive reimbursement for dental care and related services is assigned to a provider of dental care or related services, the assignment has not been revoked, and the assignment is known to the

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Evers Signs Five Bills in Wausau

By Mike Leischner

🕒 Jan 31, 2024 | 1:51 PM



Governor Tony Evers (center) joined by Senator Mary Felzkowski and Assemblyman Pat Snyder at a bill signing in Wausau. MWC photo by Mike Leischner

WAUSAU, WI (WSAU) — Governor Tony Evers spent part of his morning in Wausau signing five bills into law.

The new laws are aimed at expanding access to dental care throughout the state, which Evers says is just as important as other forms of healthcare. "Oral health impacts every aspect of your life. Making sure that it's available for people [who] struggle or don't have access is important. It's an important piece just like mental health or other health programs."

Over 65% of Wisconsin's 72 counties are designated as dental health professional shortage areas. Evers adds that the problem isn't new. "I can only speak for the last five years. I know Senator [Mary] Felzkowski worked on it before that. But I think we have always known that the Northwoods and other rural areas of the state struggle with healthcare issues."

Senator Felzkowski one of the bills allows for the no-hassle transfer of hygienist licenses, which could make it easier for former residents to come back to Wisconsin to work. "This opens the door for people who have been trained in accredited programs in other states to enter our workforce immediately. I would guess if you want to move back to Wisconsin we are making a plea to you- they can come tomorrow.

"Maybe they were originally residents and they'd like to move back with their families. They can now operate and work in Wisconsin," added Felzkowski.

insurer at the time that a claim is received, then the insurer must directly pay the provider the amount of the claim under the same criteria and payment schedule under which the insurer would have reimbursed the insured individual.

The act permits an insurer to require an assignment or revocation of assignment to be documented in writing or submitted electronically.

The changes in this Act became effective on September 1, 2024

McGraw, K. (2024, February 26). Wisconsin Legislative Council Act Memo, 2024 Wisconsin Act91

<https://docs.legis.wisconsin.gov/2023/related/lcactmemo/act091.pdf>

2023 Wisconsin Act 212

Various Changes to Insurance Laws (OCI Tech Bill)

2023 Wisconsin Act 212 requires the Wisconsin Retirement Board to include the commissioner or the commissioner's designee. The commissioner may designate the deputy commissioner, chief legal counsel, or chief financial regulator to serve as a member of the board.

The act permits the commissioner to enter into a contract for the services of a consultant if both of the following apply:

- The office and the insurance department of another state are coordinating a review on a regulatory matter.
- The other state's insurance department has already procured the services of the consultant.

The act specifies that the insurance security fund must be composed of five segregated accounts instead of six, including an insurance and annuities account, which was previously separated into two accounts. After a liquidation order is issued, the board of directors of the insurance security fund must estimate separately for each of the five accounts of the insurance security fund, and separately for life insurance policies and

for annuity contracts in the life insurance and annuities account, the amounts necessary to make the payments provided by the insurance security fund. The board must authorize assessments separately for each account and separately for life insurance policies and annuity contracts in the life insurance and annuities account.

The act also specifies that, except as provided for administrative assessments, concerning the life insurance and annuities account, the board must calculate the assessments separately for life insurance policies and annuity contracts. The assessments are a percentage of premiums each insurer receives in this state in the classes protected by the account for the year immediately preceding the year in which the board authorizes the assessment. If the assessment data for the year immediately preceding the year in which the board authorizes the assessment is not available when the assessment is called, then the board may use the assessment data for the most recent year for which data is available.

Additionally, the act permits the insurance security fund to negotiate and contract with other guaranty associations to provide and receive administrative services, claims services, and other services that are usual to guaranty associations.

The act specifies that the Office of the Commissioner of Insurance may refuse to disclose and may prevent any other person from disclosing various information obtained by the office from, or provided by the office to, the insurance security fund under a pledge of confidentiality or to assist or participate in monitoring activities or in the conduct of an inquiry, investigation, or examination.

The act specifies that a health maintenance organization participating in the family care program is subject to state law on insolvency funding in the regulation of care management organizations.

The act specifies that the articles or bylaws of a service insurance corporation may require, consistent with applicable jurisdictional requirements, that any or all claims pertaining

to the internal affairs of the service insurance corporation must be brought solely and exclusively in the courts in this state.

The act specifies that whoever violates an insurance statute or rule, intentionally aids a person in violating an insurance statute or rule, or knowingly permits a person over whom they have authority to violate an insurance statute or rule must, if the violation involves or constitutes fraud or misrepresentation, forfeit to the state not more than \$5,000 for each violation.

The act specifies that, after a hearing, the commissioner may revoke, suspend, or limit in whole or in part the license of any intermediary or individual navigator if the commissioner finds that the licensee is not competent or trustworthy, instead of the previous provision for a licensee who is not of good character.

The act specifies that upon issuance of any order revoking an insurer's authority to do business in this state, the insurer must, within 10 business days and by separate written notice, notify all agents appointed with the insurer and must provide a copy of the notice to the commissioner. The commissioner must publish a notice of the revocation in whatever reasonable form the commissioner designates.

The act eliminates the following prior law requirements:

- The commissioner must, by rule, develop, in consultation with the appropriate advisory council or committee designated by the commissioner, a uniform employee application form that a small employer insurer must use when a small employer applies for coverage under a group health benefit plan offered by the small employer insurer.
- The commissioner must, by rule, prescribe uniform questions and the format for applications for individual major medical health insurance policies. An insurer may use only the prescribed questions and format for individual major medical health insurance policy applications.
- Every small employer insurer must use the uniform employee application form

developed by the commissioner when a small employer applies for coverage under a group health benefit plan offered by the small employer insurer.

The act eliminates the following prior law requirements:

- The commissioner must study whether, in certain types of transactions with health care providers, compliance by health insurers with certain standards is likely to reduce the cost of health care administration.
- The commissioner, in consultation with the Department of Health Services, must study the feasibility and cost-effectiveness of health insurance identification cards and a computerized support system for the cards.

The act eliminates the following prior law requirement:

- Each entity that is a navigator or individual navigator must furnish a bond in an amount no less than \$100,000 from an insurer authorized to do business in this state or provide other evidence of financial responsibility capable of protecting all persons against the wrongful acts, misrepresentations, errors, omissions, or negligence of the navigator.

The changes in this Act became effective on March 24, 2024

McGraw, K. (2024, April 23). Wisconsin Legislative Council Act Memo, 2024 Wisconsin Act212

<https://docs.legis.wisconsin.gov/2023/related/lcactmemo/act212.pdf>

2023 Wisconsin Act 213

Various Changes to the Worker's Compensation Law

2023 Wisconsin Act 213 makes changes to the state worker's compensation law. The changes were recommended by the Worker's Compensation Advisory Council, which is statutorily directed to advise the Department of Workforce Development (DWD) on the worker's compensation law and to recommend legislative changes.

Act 213 does all of the following:

- Increases the maximum weekly compensation rate for permanent partial disability to \$438 for injuries occurring on or after the act's effective date to December 31, 2024, and to \$446 for injuries occurring on or after January 1, 2025.
- Updates terminology from "advanced practice nurse prescribers" to "advanced practice registered nurses" in ch. 102, Stats.
- Provides that the statute of limitations for compensation claims begins running from the date a compromise agreement is issued by the Division of Hearings and Appeals (DHA), and that subsequent claims are not barred except as provided under s. 102.17 (4), Stats.
- Specifies that after DHA issues an order on the merits of a case or an order approving a compromise agreement, DHA must return the case file to DWD and DWD must conduct further administrative activities, including closing the claim.
- Authorizes an employer or employer's insurer to voluntarily make a lump sum payment of unaccrued permanent partial disability benefits in undisputed claims without an interest credit.
- Changes references to spouses to gender-neutral terminology in ch. 102, Stats.
- Updates citations to the amended federal Rehabilitation Act of 1973.
- Increases the threshold for payments from the uninsured employers fund from \$1,000,000 to \$2,000,000.

The changes in this Act became effective on March 24, 2024

Letzing, R. (2024, March 26). Wisconsin Legislative Council Act Memo, 2024 Wisconsin Act 213

<https://docs.legis.wisconsin.gov/2023/related/lcactmemo/act213.pdf>

Administrative Rules

In 2024, OCI promulgated the following change in the Wisconsin Administrative Code.

Chapter § 3.15 – relating to the inclusion of “veterans” as a category of “eligible risks” under INS 3.15 (4) (a).

The rule aligned Ins 3.15 with current OCI practice. OCI finds it appropriate that “veterans” should be a recognized risk category eligible for blanket accident and sickness insurance. Therefore, OCI approves this risk category on case-by-case basis, pursuant to Ins 3.15 (4) (b) (providing that “[a] company may submit any other risk or class of risks, subject to approval by the commissioner, which it believes is properly eligible for blanket accident and health insurance”). The amendment to Ins 3.15 (4) (a) explicitly set forth “veterans” as an eligible risk category, thereby streamlining the approval process and reducing the administrative burden on insurers seeking to offer this product.

In 2024, OCI had no rules repealed through an expedited process.

In 2024, OCI had no emergency rule in effect.

Administrative Actions

OCI is responsible for administering and enforcing the insurance laws of Wisconsin. This includes monitoring the financial and marketing practices of individuals and companies. All complaints are investigated to determine if any Wisconsin laws have been violated. In cases of serious violations, administrative actions are taken.

The following administrative actions were taken in 2024.

Companies	
Total Number of Actions	42
Forfeitures Demanded	\$28,600

Agents	
Licenses Denied	41
Licenses Revoked	155

Agents	
Licenses Surrendered	15
Licenses Suspended	4
Total Number of Actions	284
Forfeitures Demanded	\$63,600

Each month, OCI publishes the administrative actions it has taken. The actions are issued by OCI when licensing applicants or licensed individuals or companies have violated Wisconsin insurance statutes or regulations. In some cases, the individual or company denied the stated allegations but consented to the action taken. OCI strives to ensure fair and honest business practices to protect Wisconsin insurance consumers through this type of transparency.

Administrative orders may be viewed online at ociaccess.oci.wi.gov/OrderInfo.

You can search all Administrative Orders for 2024 or by other criteria.

Any forfeitures paid are deposited in Wisconsin’s Common School Fund, administered by the Board of Commissioners of Public Lands. Earnings from the Fund are distributed to all public K-12 schools in the state and are used by school libraries to purchase materials such as library materials and computers.

The total amount remitted by OCI to the Common School Fund for all forfeitures for 2024 was \$117,390.18.

The public can [subscribe to OCI’s electronic mailing list](#) to receive notices of monthly administrative actions.

Public Affairs

Public Affairs Unit

The Public Affairs unit oversees communications, outreach, marketing, and legislative affairs to support the mission of OCI.

This unit is overseen by the Director of Public Affairs and includes a legislative policy advisor, an advanced communications specialist focusing on graphic design and marketing, a social media and outreach specialist, and a copy editor/content manager.

In 2024, the Public Affairs unit shared information on important insurance topics for consumers, reminders for agents and other licensees, and other topics across our social media platforms. OCI also shared information related to climate resilience and pre-disaster mitigation so consumers can prepare themselves and their property for the weather events that impact Wisconsin.

Public Affairs is also responsible for maintaining the oci.wi.gov public website for consumers, stakeholders, and industry stakeholders.





The website links to dozens of consumer publications drafted by the insurance examiners in the Consumer Affairs unit on topics ranging from renters insurance to disputing health insurance claim denials.

The Public Affairs Unit communicates strategically to increase awareness of OCI and insurance issues and build financial and health insurance literacy across the state. Key areas of focus include:

- Spreading Awareness about the work of OCI
- Increasing Financial Empowerment through Insurance Literacy
- Expanding Health Insurance Coverage
- Educating Wisconsinites about Life Insurance
- Increasing Flood Insurance Coverage
- Empowering Farmers with Insurance Information

Health Insurance Access

Governor Evers launched the [DHS OCI Health Care](#)

[Coverage Partnership](#) in 2019 to improve coordination around outreach and education, increase enrollment and health insurance literacy, and improve enrollment retention. In 2020, this partnership launched [WisCovered.com](#) as an accessible resource for consumers to get connected with enrollment information year-round. The online services are available in English, Spanish, and Hmong. In 2024, this Partnership celebrated its fifth anniversary and drafted a new [charter](#) to guide its work in the future.

Outreach and Awareness

OCI's consumer outreach and stakeholder engagement are important to ensure that Wisconsinites have high insurance literacy to navigate the state's competitive insurance marketplace. Throughout 2024, OCI conducted outreach around the state in virtual formats and in person.

The OCI DHS Health Care Coverage Partnership holds quarterly public meetings to engage stakeholders from the health insurance industry and community leaders who can help amplify health coverage information in their spaces.

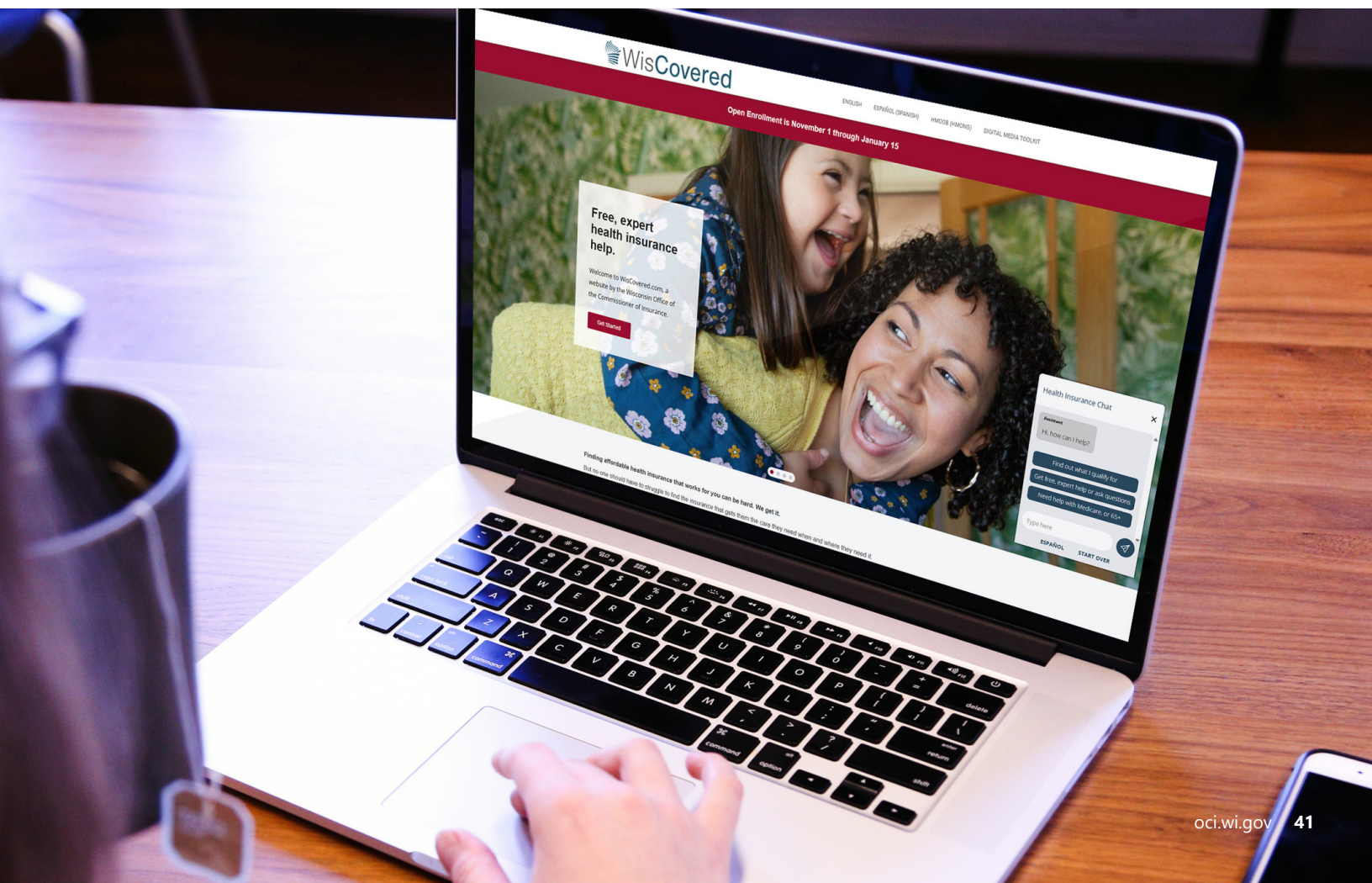
The Public Affairs unit continues to share information and conduct outreach as part of the Stronger Wisconsin initiative focuses on climate risk, resiliency, and pre-disaster mitigation. Pre-disaster mitigation efforts can reduce or eliminate risk to people and property from the impact of disasters. This can take the form of community-wide risk reduction projects; improvements to critical infrastructure; building codes that strengthen new construction; and improving the resiliency of existing structures. Stronger Wisconsin is an outreach initiative to connect with individuals and communities that may be impacted by climate disasters so we can spread the word about mitigation opportunities. We also work to connect the dots across industries, state

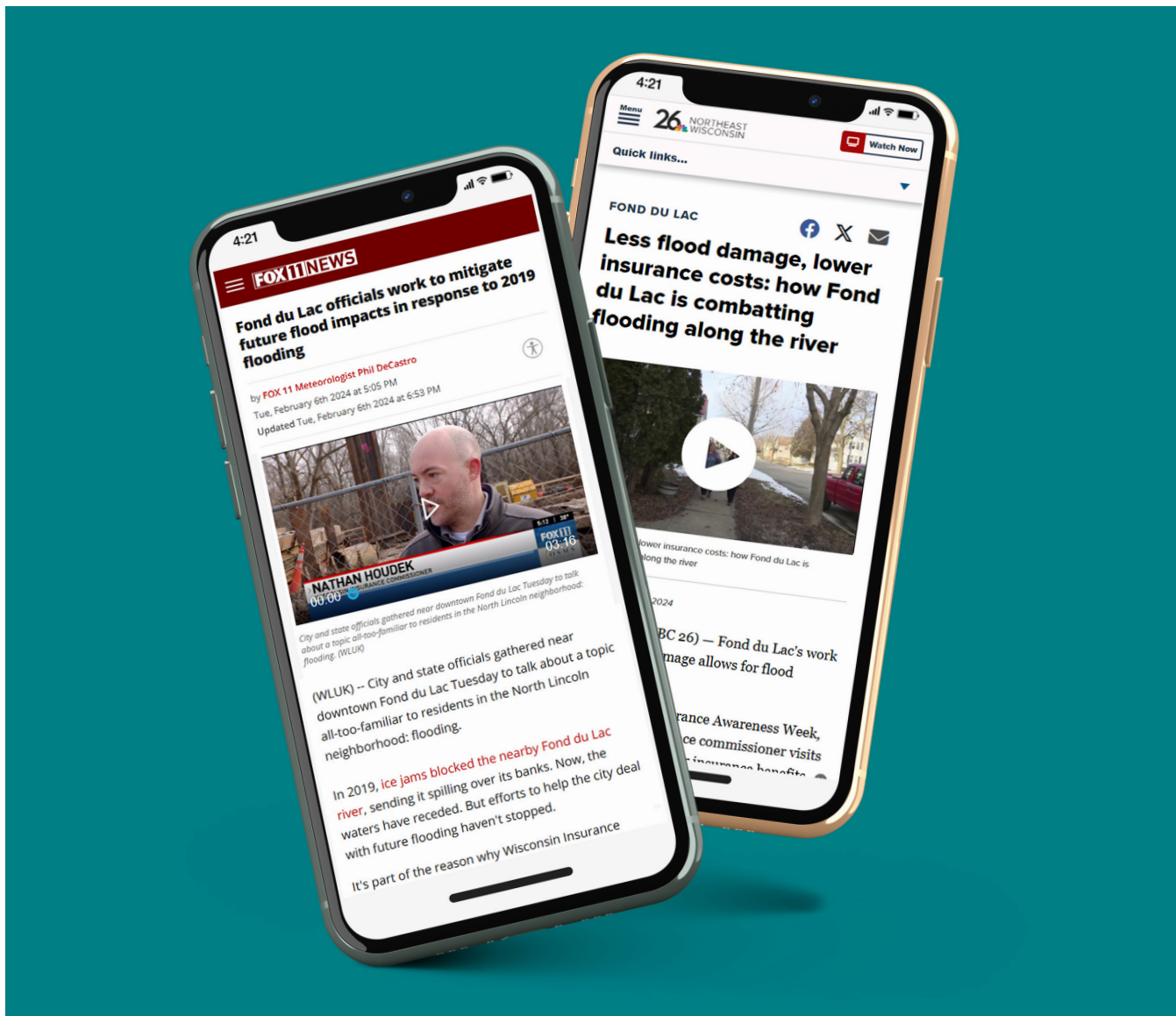
agencies, and local governments to build more resilient communities.

OCI also creates approachable consumer publications, FAQs and Fact Sheets, and informative webpages on important topics. A comprehensive list of OCI consumer publications can still be found at oci.wi.gov/publications. Consumer publications can also be ordered online in hard copy format at oci.wi.gov/Pages/Consumers/Order-a-Publication.aspx.

Social Media

Social media is a critical component of OCI's communications strategy. Social media platforms like Facebook, X, Instagram, YouTube, Nextdoor, and LinkedIn allow us to raise awareness about our role regulating the insurance marketplace so that consumers know where to turn when they encounter an issue or have an insurance question.







	 Impressions	 Interactions	 Communications
	75,716 Impressions	3,015 Engagements and Link Clicks	300 Posts Published
	44,780 Views	967 Engagements and Link Clicks	250 Posts Published
	12,201 Impressions and Video Views	475 Engagements	500 Posts Published
	85,215 Impressions and Views	183.2 Hours Watched	.6% Click-Through Rate
	14,756 Impressions	2,005 Engagements and Link Clicks	56 Posts Published
	3,120,059 Impressions	984 Reactions	25 Posts Published

Wisconsin Department of Workforce Development
9,260 followers
2w • 🌐

DWD and the [Wisconsin Office of the Commissioner of Insurance \(OCI\)](#) announced an 8.4% decline in worker's compensation insurance rates in 2023, which will save [#Wisconsin](#) employers an estimated \$148 million in premiums. The 2023 rate marks 8 years in a row of decreased worker's compensation insurance premiums in the state. See our DWD Annual Report for more 2023 [#workforce](#) highlights: bit.ly/DWD-23

DWD
DWD announces an **8.4% decline** in worker's compensation rates in 2023, saving Wisconsin employers an estimated **\$148M**
*In Worker's Compensation Insurance premiums
DWD 2023 Annual Report

Wisconsin Health News was live.
1h • 🌐

The rising cost of prescription drugs is threatening patient access and squeezing healthcare budgets. Our panel is taking a deep dive into the issue.

Nathan Houdek, David Bowen, Dr. Mark Huth, Sean Stephenson, Kevin Mead, Tim Sturgeon

002 / 1:00:50

Hausch and Company
1,378 followers
1mo • 🌐

Impressive insights were shared by [Brian Darrey](#) during the [#FVAA](#) March meeting at the [Wisconsin Office of the Commissioner of Insurance \(OCI\)](#). It was a pleasure to support and attend with our dedicated WI team: [Jeff Blevins, CPCU, AIC, Dave Warrick](#), and [Barry A. Parks AIC, AIS, AINS, #Insurance #ClaimsAdjuster #ProfessionalDevelopment](#)

THANK YOU!

FVAA
FOX VALLEY ADJUSTERS ASSOCIATION

Marian University of Wisconsin
9h • 🌐

Business students at [Marian University of Wisconsin](#), heard guest speaker Amy Malm, Administrator for the Division of Financial Regulation with the [Wisconsin Office of the Commissioner of Insurance](#), who gave an excellent presentation about changes in the industry and what keeps her up at night. Students who attended were from many majors, including [#Finance](#), [#Business Administration](#), [#Accounting](#), Sport and Recreation Management, Risk Management and Insurance and Marketing, [#inspiration](#), [#insurance](#)

+8

Wisconsin Department of Workforce Development
9,548 followers
1mo • 🌐

[Governor Tony Evers](#), along with DWD, the [Wisconsin Office of the Commissioner of Insurance \(OCI\)](#), and the [Wisconsin Department of Health Services \(DHS\)](#) joined local and regional leaders today to provide updates on the administration's rapid response and other efforts to support local workers and community members affected by the recent announcements concerning HSHS and Prevea. Learn more: bit.ly/3w63lko

Wisconsin OCI @wisconsinoci

Over the last year, fraud was on the rise in Wisconsin! Taking steps to protect your personal data is time well spent compared to the cost and inconvenience of falling victim to a scam. Review our tips for safety at oci.wi.gov/Cybersecurity. Source: @FTC #ConsumerProtectionWeek



Wisconsinites lost \$75.9 million to fraud in 2023.

7:53 AM · Mar 6, 2024 · 299 Views

Wisconsin Office of the Commissioner of Insurance
December 27, 2024

A quality health insurance plan helps keep you off the bench during life's important moments. It's Open Enrollment season in Wisconsin, and experts at WisCovered.com can help you explore your options for free. Make a game plan for the future and get covered today!



When it comes to your health, there's no room to fumble.

Score free, expert help with health insurance at **WisCovered.com.**

2

Fact:

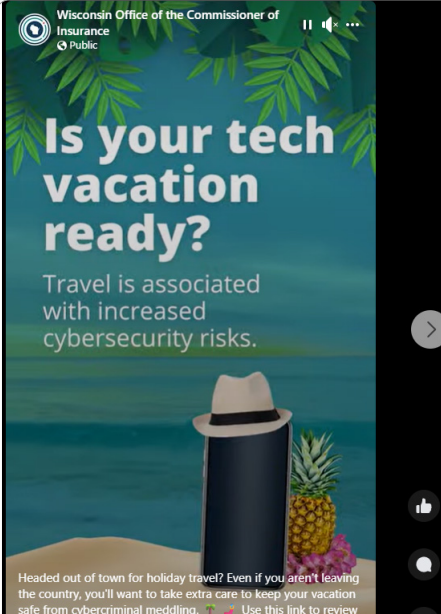
Most homeowners insurance policies do not cover flooding

#FloodInsuranceAwarenessWeek

Wisconsin Office of the Commissioner of Insurance
Public

Is your tech vacation ready?

Travel is associated with increased cybersecurity risks.



Headed out of town for holiday travel? Even if you aren't leaving the country, you'll want to take extra care to keep your vacation safe from cybercriminal meddling. Use this link to review a pre-vacation cybersecurity checklist from [National](https://nationalcybersecurityalliance.org)

Wisconsin OCI @wisconsinoci

Let's face it: nobody looks forward to making an insurance claim. But when storms move into town, you may not have a choice. The experts at @wisconsinoci are here to ease the process with tips for filing a claim after a storm. Read here: oci.wi.gov/AfterStorm @ReadyWisconsin




Got questions about using insurance after a storm hits?

0:06

10:48 AM · Apr 8, 2024 · 85 Views

Wisconsin OCI @wisconsinoci

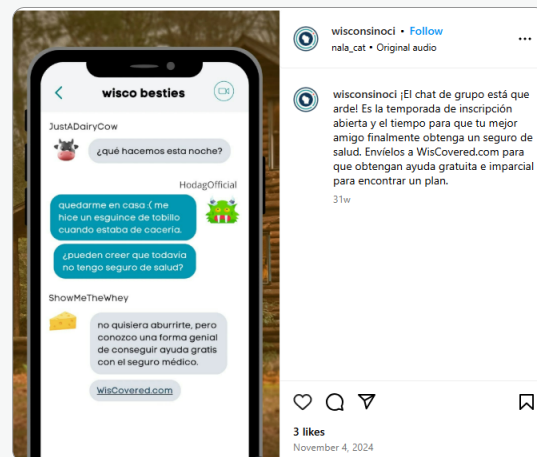
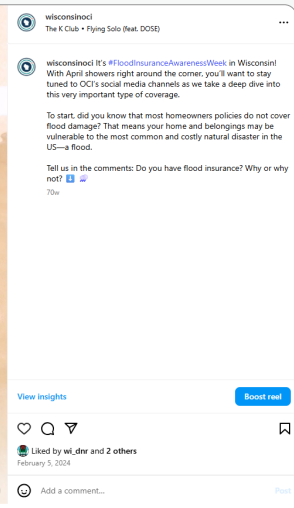
Here in the dairy state, over by the agriculture industry. insurance needs, and the ex few helpful tips. Read more



What sh farmers about in

ALT

12:34 PM · Jan 19, 2024 · 60 Views



OF
ATION

Division of Enterprise
Enterprise use in State of Wisconsin

24

OPTins for your Wisconsin filing entity.

You will log into OPTins and go through the three-step filing wizard. Step two will allow you to download and save your form. From there you will enter your NAIC CoCode and your prior year assessment amount to access the current year amount.

On step 3, you will include the \$15 NAIC Transaction fee with your Assessment fee to Wisconsin.

What are the next steps if you don't have an OPTins account?

If you have not created an OPTins account, the steps to implement an account and submit your assessment filing are very simple. Go to www.optins.org and click on New Users → Get Started on the right-hand side. There you will find the implementation paperwork and easy-to-follow instructions.

It is important to register early because to set up a new account takes 7-10 business days. Contact the OPTins Marketing Team at optinsmktg@naic.org or call (816) 783-8787 if you have any questions regarding the implementation process.

Please provide the appropriate contact name and email address for future correspondence to:

Lilian Kahite

Wisconsin Office of the Commissioner of Insurance


Lilian.Kahite@wisconsin.gov

Any questions or comments applicable to this e-mail should be directed to Lilian Kahite at the above contact details.

DEPARTMENT
ADMINISTR

Produced by the State Bureau of Procurement,
Operations, Department of Administration, for
Government.

Revision Date 01/09/2024



Wisconsin Office of the
COMMISSIONER
OF INSURANCE

Tony Evers, Governor of Wisconsin

Nathan Houdek, Commissioner of Insurance

DATE: January 31, 2024

TO: ALL DOMESTIC INSURERS

FROM: Nathan Houdek, Commissioner

SUBJECT: 2024 Examination Assessment

Under Chapter Ins 16, Wis. Adm. Code, domestic insurers shall be billed annually an amount equivalent to that insurer's share of the estimated cost of conducting the insurer examinations program during that year.

The 2023 examination assessment was calculated to be \$8,541,936. A "constant of proportionality" (or K factor) is used to calculate an initial assessment for each insurer. Some of the calculation amounts exceed the maximum specified by Wis. Adm. Code, and must be reduced to the maximum amount allowable, while others are increased to make up the difference. A computer program adjusts (on a pro-rata basis) the amount for each insurer not already at its maximum, until the required total assessment is reached. The final adjustments result in the calculation of an adjusted K factor. The adjusted K factor is used to calculate the final assessment. The minimum assessment is \$3,000 for in-state companies and \$10,000 for out-of-state companies. For those companies not at the maximum assessment, the square root of a company's 2022 premium earned multiplied by the 2024 adjusted K factor of 3.03* will approximate the 2024 assessment.

Payment is due by March 1, 2024, and can be made via OPTins.

If you have any questions, please contact Lilian Kahite at Lilian.Kahite@wisconsin.gov.

* For those domestic insurers located out of state for examination purposes and are not at their maximum assessment the adjusted K factor of 0.59 should be added.

125 South Webster Street, P.O. Box 7873 | Madison, WI 53707-7873


p: 608-266-3585 | p: 1-800-236-8517 | f: 608-266-9935

ociformations@wisconsin.gov | oci.wi.gov

1 Purchasing Card Manual 2024

January 9, 2024

State of Wisconsin Purchasing Card Manual



Produced by the State Bureau of Procurement, In the Division of Enterprise
Operations, Department of Administration, for enterprise use in State of Wisconsin
Government.

Revision Date 01/09/2024

COMPANIES

Insurance


48 OCI 2024 Annual Report


er of Insurance has implemented the
sconsin assessments. Wisconsin will be
ssment.

1 Purchasing Card Manual 2024

January 9, 2024

State of Wisconsin Purchasing Card Manual





Wisconsin Office of the
COMMISSIONER
OF INSURANCE

DATE: January 31, 2024

TO: ALL DOMESTIC INSURERS

FROM: Nathan Houdek, Commissioner

Office of Operational Management

The Office of Operational Management (OOM) is responsible for information technology, project portfolio management, budget, accounting, and facilities management.

Financial Management

This section provides accounting, budgeting, contract management, internal controls, procurement, risk management, and vendor payment services for OCI. The section produces the annual operating budgets for all units of OCI, external financial reports at the fund and agency level, GAAP reports, and required statutory reports, e.g., the minority contracting reports, as well as annual contract justification for continued contract renewals.

Section staff members are responsible for providing technical budget assistance and guidance to OCI managers and staff, tracking expenditures and revenues, collecting accounts receivables, calculating and billing the annual examination assessment, calculating and billing the annual care management organization examination charges, administering the state purchasing card program, cashiering, and serving as liaison with the Department of Administration

State of Wisconsin
Office of the Commissioner of
Insurance



Agency Budget Request
2025 – 2027 Biennium
September 16, 2024

(DOA) procurement staff. A staff member is a participating member of the State Agency Purchasing Council.

Some of this year's accomplishments in this section include:

- Biennial Budget Request
- Prepared GAAP information for the general fund and the insurance liquidation account pursuant to DOA guidelines and requirements
- Completed the State Controller's Office compliance review and made process changes to incorporate their suggestions
- Successfully completed multiple contract renewals and created purchase orders to ensure contract spending compliance

Project Portfolio Management

OOM is responsible for coordinating projects with OCI's Project Governance Board (PGB). The Portfolio Manager ensures projects are aligned with OCI's strategic business plan, facilitates the PGB meetings, provides project status reports to the PGB, and works with the Enterprise Continuous Improvement point-of-contact to ensure projects are meeting the goals identified by the Enterprise Continuous Improvement Program. This section also provides mentoring to staff interested in working on projects as project managers and assists staff in completing project proposals and business case documents.

In 2024, the OOM project management team successfully:

- Provided project management support to high-consequence information technology and organization relocation projects
- Improved the process for the review and routing of the Verizon phone bills to be done electronically
- Successfully completed several information technology projects



Office of Administrative Services

The Office of Administrative Services is responsible for providing administrative services for the agency and its business units. It serves as the liaison between OCI, the Department of Administration, and the Division of Personnel Management for human resource services, manages Central Files, open records requests, the agency's Records Disposition Authorization (RDA) schedules, supports OCI's reception desk, and manages OCI's training function. The office also provides administrative services for the agencies' two funds: the Injured Patients and Families Compensation Fund and the State Life Insurance Fund.

Central Files and Reception Unit

This unit is responsible for OCI's records management, front desk, mailroom, central records, and staff training. In addition to being the agency's training coordinator, the supervisor of the unit is a liaison to OCI business areas and outside agencies including the Public Records Board, the Wisconsin Historical Society, and the State Records Center to ensure the Records Disposition Authorization (RDA) are current and proper disposition of records occur. The supervisor

attends Public Records Board meetings with other state agency records officers and tracks and responds to agency open records requests. In 2024, 77 exams were proctored, leading to 17 designations. OCI created seven new RDAs and amended three existing RDAs. The unit also processed 253 open records requests and mailed 2,289 publications upon request. Nine boxes of records were sent to the Wisconsin Historical Society per retention guidance. 397 boxes were sent to the State Records Center (SRC) for confidential unwitnessed destruction. 12 boxes of materials appropriate for secure media destruction were sent to the SRC. 70 boxes of legal inventory,

and 70 boxes containing records from Financial, Market Regulation, and the Injured Patients and Families Compensation Fund were sent to SRC for their continued retention. In addition, this unit decreased the size of central files by 50% due to the move.

The supervisor of this unit also oversees and embraces the agency's employment of disabled individuals through Community Work Services, Inc. These staff members play a vital role in the confidential destruction of records. In 2024, they destroyed 250 boxes of confidential material in house and provided other services to the agency.



Injured Patients and Families Compensation Fund Introduction

The Injured Patients and Families Compensation Fund (Fund) was created in 1975 to provide medical malpractice insurance for Wisconsin health care providers in excess of the provider's primary limits of coverage. The Fund provides coverage in excess of the primary limit established by statute, which is currently \$1 million per occurrence and \$3 million aggregate per year. Participation in the Fund is mandatory for health care providers as defined by Chapter 655, Wis. Stat.

The Office of the Commissioner of Insurance (OCI) provides administrative support for the Fund's operations. The Fund is governed by a 13-member Board of Governors (Board) which is chaired by the deputy commissioner of insurance. The Board is comprised of four public members appointed by the governor, three insurance industry representatives, a member named by the Wisconsin Association for Justice, a member named by the State Bar of Wisconsin, two members named by the Wisconsin Medical Society, and a member named by the Wisconsin Hospital Association.

FY24 Board of Governors (as of 6/30/24):

Rebecca Easland, Deputy Commissioner of Insurance (Board Chair)

Carla Borda, Public Member
Hammad Haider-Shah, M.D., Public Member
Vacancy 1, Public Member
Vacancy 2, Public Member
Susan Forray, Industry Representative
David Maurer, Industry Representative
Vacancy 1, Industry Representative
Daniel Rottier, Wisconsin Association for Justice (deceased January 2025)
Jerome Hierseman, State Bar of Wisconsin
Bud Chumbley, M.D., Wisconsin Medical Society
Timothy Crummy, M.D., Wisconsin Medical Society
Matthew Stanford, Wisconsin Hospital Association

The following committees and council support the Fund's governance and typically meet each quarter:

- Actuarial and Underwriting Committee
- Legal Committee
- Claims Committee
- Finance/Investment/Audit Committee
- Risk Management and Patient Safety Committee
- Peer Review Council

The Fund operates on a fiscal year basis: July 1 through June 30. Administrative costs, operating costs, and claim payments are funded through assessments on participating health care providers.

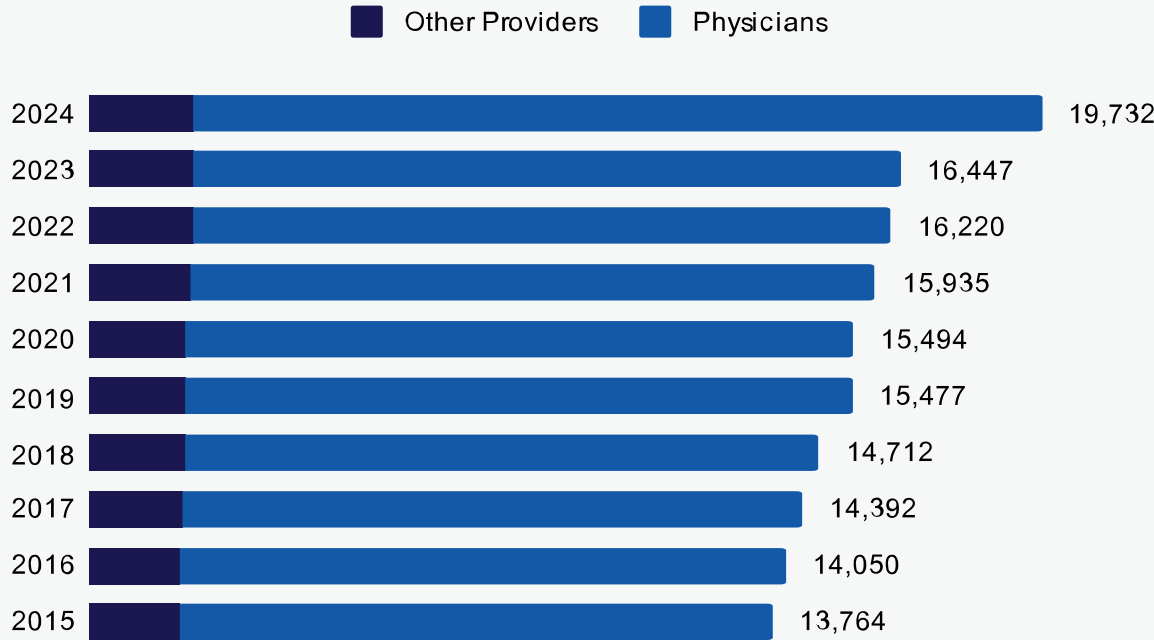
Fund Participants

As of June 30, 2024, there were a total of 19,732 Fund participants comprised of 155 hospitals with

12 affiliated nursing homes, 17,193 physicians, 1,111 nurse anesthetists, 16 hospital-owned or controlled entities, 64 ambulatory surgery centers, one cooperative, 10 partnerships, and 1,170 corporations actively participating in the Fund.

As of June 30, 2024, Fund participants consisted of 87 percent physicians, six percent corporations, and the remaining seven percent included all other participants.

Claims Activity



From July 1, 1975, through June 30, 2024, the Fund was named in 6,505 claims filed. During this period, the Fund’s total number of paid claims was 711, for total indemnity payments of \$1,003,538,889.43. Of the total number of claims in which the Fund has been named, 5,699 claims have been closed with no indemnity payment.

Board Committees

Actuarial and Underwriting Committee

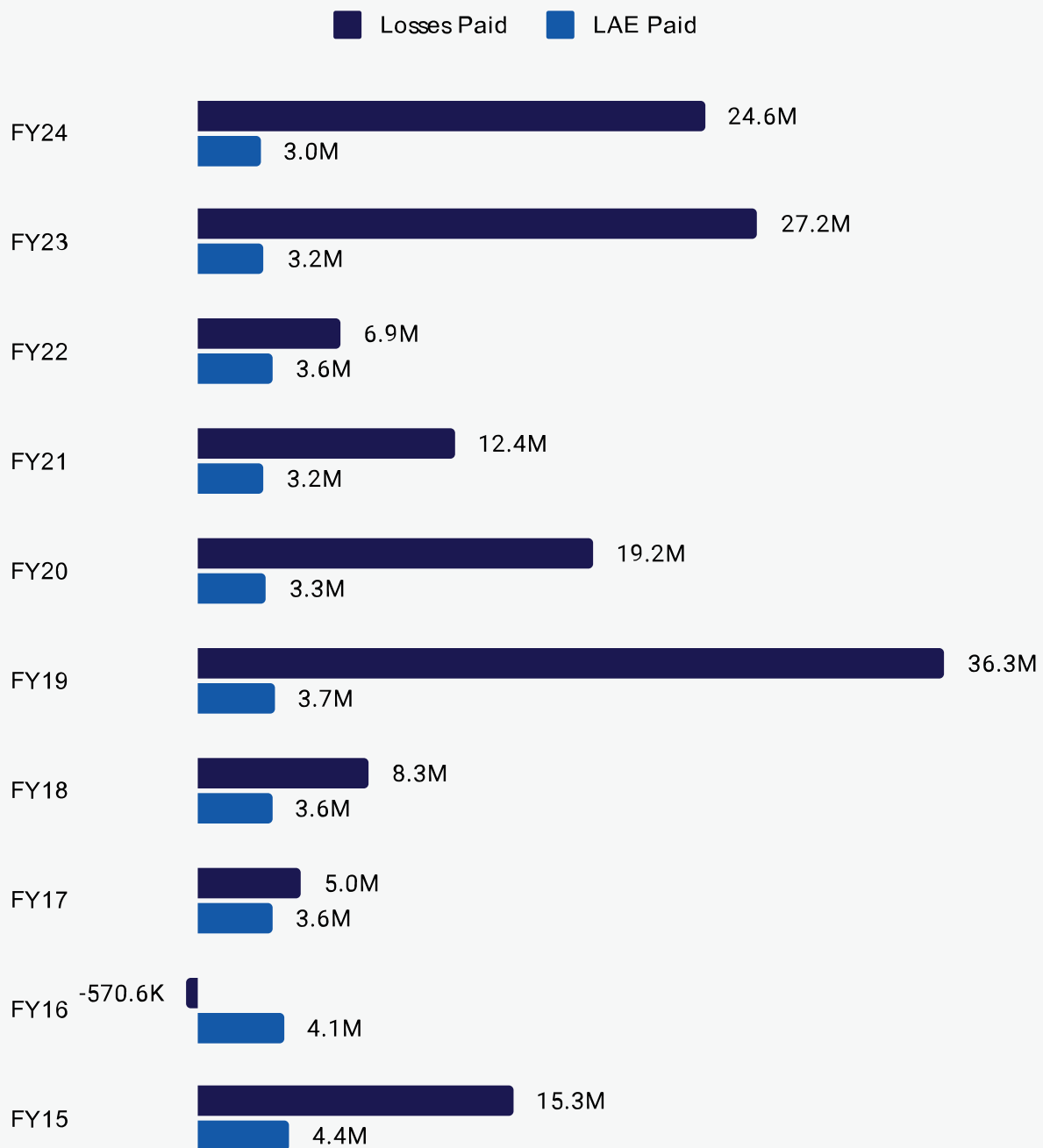
The Actuarial and Underwriting Committee advises the Board on actuarial and underwriting issues.

Following a three-year premium holiday intended to mitigate the hardship experienced by medical providers due to the pandemic, the Fund resumed billing for fiscal year 2024. The committee assisted the Board in establishing fiscal year 2024 fees. The Board approved resuming the annual assessment at the level that was charged in fiscal year 2020 prior to the premium holiday. Mediation panel fees for physicians (excluding physicians in a residency program) were set at \$5.00 per physician and \$1.00 per occupied hospital bed.

Claims Committee

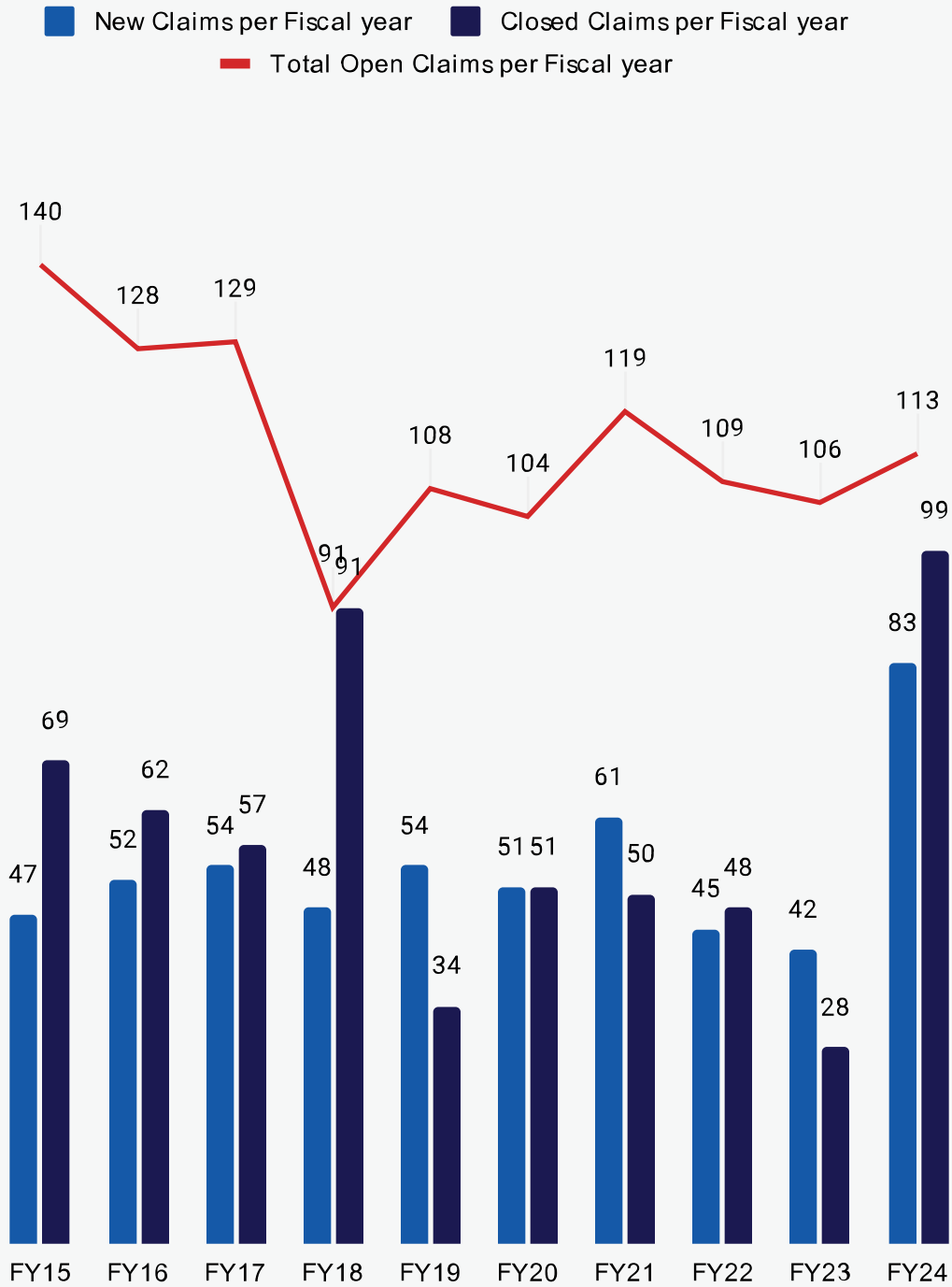
The Claims Committee is responsible for establishing claims policies and procedures for the Fund and the Wisconsin Health Care Liability Insurance Plan (Plan) and approving claims settlements.

Losses and LAE Payments per Fiscal Year



** Please note that some numbers are negative, because calculations are done on a gross basis that takes into account such things as recoverables and reductions in anticipated future medical payments.

Claims Activity



Finance/Investment/Audit Committee

The Finance/Investment/Audit Committee's responsibilities include establishing, monitoring, and amending, as necessary, the investment strategy for the Fund to ensure obligations are met. The committee periodically reviews investments for compliance with investment guidelines and evaluates cash flow liquidity needs. In

addition, the committee oversees the financial reporting process. Responsibilities include the review of financial position and results, as well as correspondence with auditors concerning audit scope, accounting issues, internal controls, and management recommendations.

Legal Committee

The Legal Committee advises the Board on legal issues, including retroactive coverage requests, appeals, proposed statutory changes, administrative rule changes, and other issues that affect eligibility or Fund participation.

During fiscal year July 1, 2023, through June 30, 2024, the committee approved 15 requests for retroactive coverage and no requests for gap coverage replacement. The committee denied one request for retroactive coverage.

Under guidelines set for expedited approval by the Board and Legal Committee, the Fund manager approved 70 requests for retroactive coverage, and the WHCLIP manager approved 24 requests for retroactive coverage.

Peer Review Council

The Peer Review Council (Council) reviews physician claim records to determine whether a surcharge should be imposed against the Fund fee or Plan premium, if applicable. The surcharge is a percentage of a provider’s Fund fee or Plan premium based on the number of closed medical liability claims reported and the aggregate amount paid for those claims.

During fiscal year July 1, 2023, through June 30, 2024, 106 claims paid reports were filed. These included 43 for physicians or nurse anesthetists, 53 for hospitals, nursing homes, corporations, or clinics, and 10 for other types of providers. No providers were subject to a possible surcharge.

Since the inception of the Council in 1986, 67 providers have been subject to a possible surcharge.

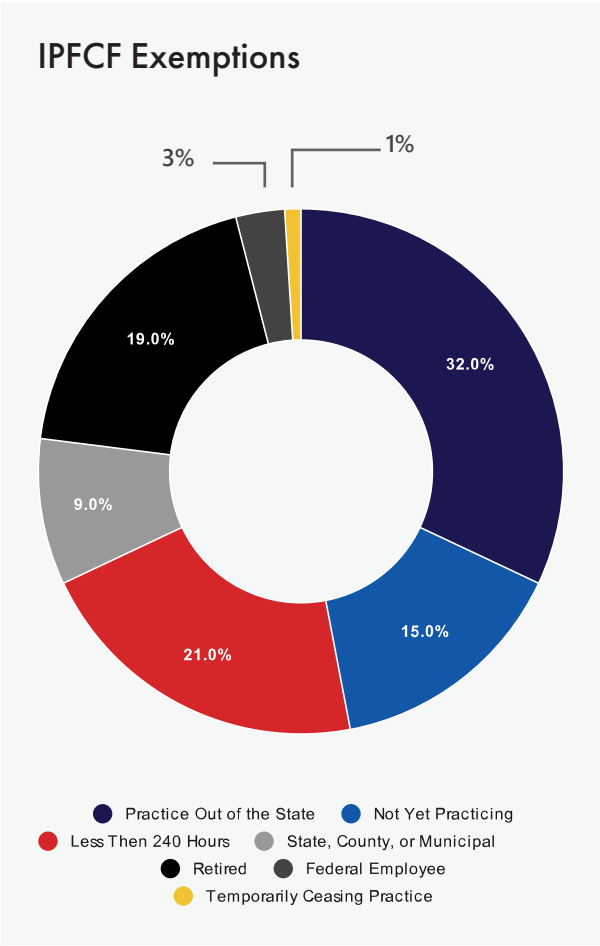
Risk Management and Patient Safety Committee

The purpose of the Risk Management and Patient Safety Committee is to reduce patient/claimant compensable injuries, reduce Fund losses and associated expenses, improve the general quality of medical care, and reduce the premiums of participating health care providers.

Other Fund Activities

The Fund continually monitors and updates the exemption status for providers that hold a license to practice in Wisconsin but for which a current exemption or certificate of insurance is not on file with the Fund. Providers that remain in noncompliance are referred to their respective licensing boards for appropriate enforcement action.

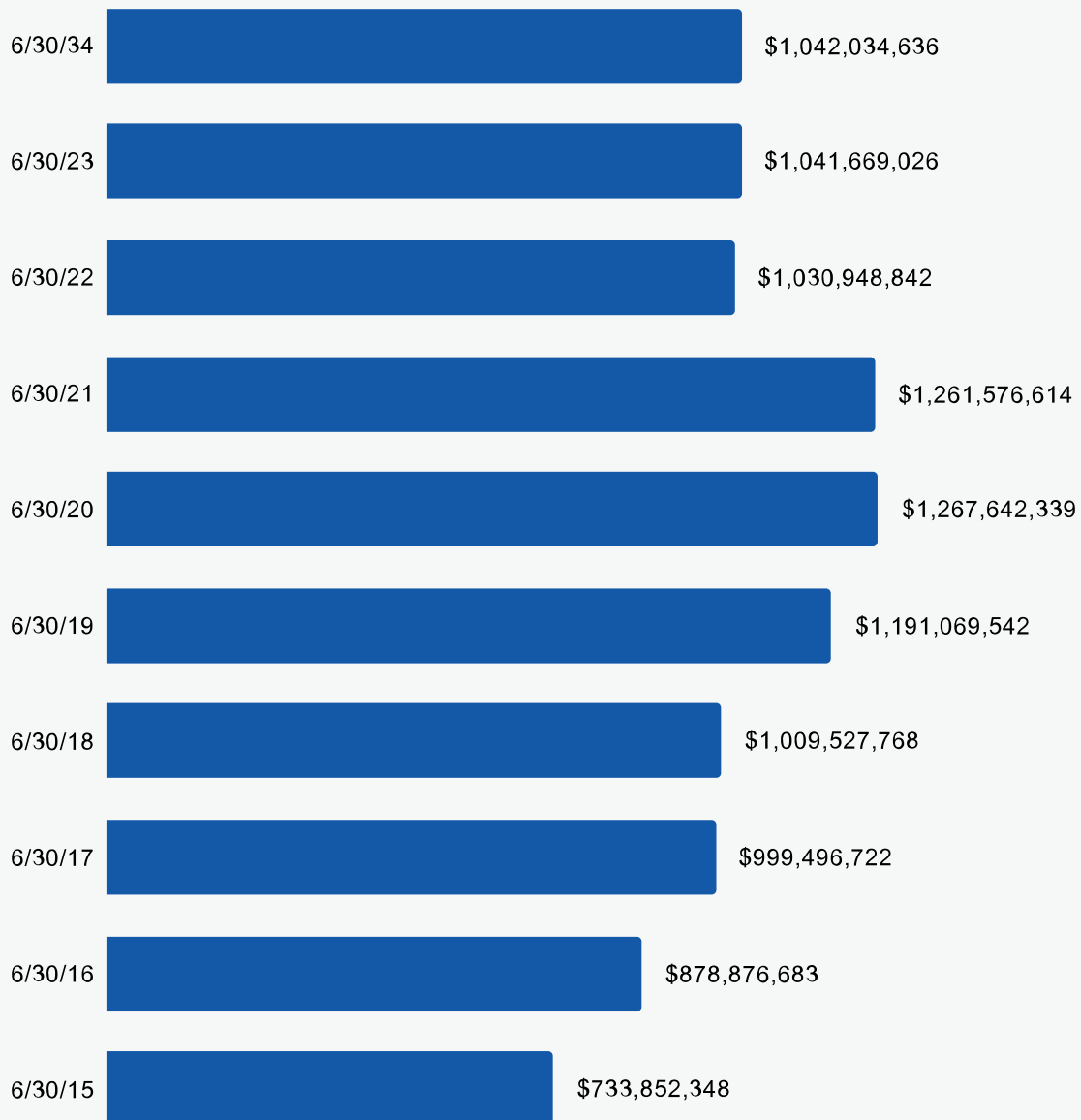
As of June 30, 2024, there are 22,928 licensed physicians and certified registered nurse anesthetists who have filed for exempt status.



Financial Statistics

The Fund reports its financial operations on a July 1 to June 30, succeeding-year basis as a part of the State of Wisconsin Annual Comprehensive Financial Report (ACFR). A copy of the ACFR can be found at: doa.wi.gov/Pages/StateFinances/ACFR.aspx

The Fund reported an unaudited net position of \$1,042,034,636 as of June 30, 2024.



The Fund's Investments are managed by the State of Wisconsin Investment Board (SWIB). Their Annual Reports can be found on their website: swib.state.wi.us/list-of-investments.

Operations

The Fund has seven employees: insurance program manager, accountant journey, two insurance program specialists, regulatory specialist, financial specialist, and office operations specialist. The Fund contracts out for actuarial services, claims adjusting services, legal counsel, independent auditing services, IT support, and investment monitoring services

Vendors paid more than \$100,000 in FY 24

Vendor Name	Annual
Oracle America, Inc	2,400,185.79
Wausau MedMal Mgt Services LLC	1,335,960.00
US Bank State of Wisconsin Investment Board	1,050,465.66
Emile Banks & Associates LLC	564,196.30
Coyne Schultz Becker & Bauer SC	406,690.68
Corneille Law Group LLC	328,796.15
Axley Brynelson LLP	274,615.72
Otjen Law Firm SC	259,785.16
Bell, Moore & Richter S.C.	233,462.85
Law Firm of Conway, Olejniczak	223,641.82
Alorica Inc	212,864.53
Gass Turek LLC	178,113.81
Clearwater Analytics LLC	141,954.65
Nash Spindler Grimstad & McCracken LLP	123,294.68



IPFCF

Injured Patients & Families Compensation Fund

Search for Provider

Enter name or license number:

Enter name or license number

All Coverage Gaps with the same Effective date and Expiration date are considered RESOLVED.

Notice of Disclaimer

This site is maintained as a public service for informational purposes only. Although reasonable efforts have been made to ensure that electronic information is accurate, complete, and timely, the State of Wisconsin and the Office of the Commissioner of Insurance (OCI) and the Injured Patients and Families Compensation Fund do not warrant, represent, or guarantee that the information is complete, accurate and timely in all instances. All information is subject to change on a regular basis, without notice. Information on this web site does not necessarily represent the official position of the Fund or views of the Commissioner of Insurance, OCI or the State of Wisconsin. Information is based upon information from "official" Fund records but is not stored within the web site.

Information provided on this site is not intended to be an interim or final determination of a health care provider's status with the Fund nor may it be relied upon without your legal counsel before using the information contained on this site for any purpose including issues related to Chapter 655, Wis. Stat. Please note that a provider may appear on this web site to have Fund coverage during a certain period of time, this in no way implies, warrants, represents or guarantees Fund coverage for all acts of the health care provider during such period of time.



State Life Insurance Fund

The State Life Insurance Fund is a segregated fund located within OCI. It offers a maximum \$10,000 life insurance policy to state residents. The Fund operates as a mutual insurance company and is generally subject to the same statutory requirements that apply to other life insurers operating in Wisconsin. It has a manager and is supervised by the commissioner.

Wisconsin is the only state that offers a life insurance program to its residents. All policies issued are participating – participating policies share in the profits in the form of dividends. Current law prohibits the Fund from employing agents or paying commissions to agents to market the Fund. OCI does not market the Fund. As of December 31, 2024, there were 20,786 policies in force.

Section 607.15, Wis. Stat., requires the State Life Insurance Fund to distribute annually among the policyholders its net profits and to the extent practical to maintain a ratio of surplus to assets between 7% and 10%. In the calendar year 2024, a distribution of \$2.6 million was paid to policyholders in the form of dividends.

Following are financial statements – balance sheet and income statements – for the State Life Insurance Fund for the year ending December 31, 2024.

State Life Insurance Fund - Income Statement December 31, 2024	
Income	
Premiums	\$ 852,643
Investment Income	4,411,130
Amortization of Interest Maintenance Reserve	772,359
Miscellaneous Income	<u>14,313</u>
Total Income	\$ 6,050,446
Expenses	\$ 1,498,000
Death Benefits	
Matured Endowments	180,000
Other Policy Benefits	1,507,857
Increase in Reserve	(121,855)
General Operating Expense	<u>525,533</u>
Expenses before Dividends	<u>3,589,535</u>
Net Gain before Dividends	<u>2,460,912</u>
Dividends to Policyholders	<u>2,594,878</u>
Net Gain (Loss) from Operations	\$ <u>(133,966)</u>

State Life Insurance Fund - Balance Sheet
December 31, 2024

Assets	
Bonds	\$ 104,354,361
Policy Loans	2,393,484
Cash and Bank Deposits	2,089,875
Premiums Deferred and Uncollected	37,324
Investment Income Due and Accrued	1,181,590
Other Invested Assets	<u>2,439,655</u>
Total Assets	\$ <u>112,496,289</u>
Liabilities and Surplus	
Life Reserves	\$ 65,522,555
Interest Maintenance Reserve	3,040,886
Policy Claims	343,000
Dividends Due and Unpaid (2022)	11,461
Dividends - Provision for 2022	2,653,580
Deposit Type Contracts	28,955,839
Unclaimed Property	96,412
Taxes, Licenses, Fees Accrued	510
Suspense and Canceled Drafts	97,593
Expenses Due and Accrued	63,804
Back Up Withholding	2,034
Premiums Received in Advance	16,823
Asset Valuation Reserve	<u>685,760</u>
Total Liabilities	\$ <u>101,490,257</u>
Surplus	<u>11,006,033</u>
Total Liabilities and Surplus	\$ <u>112,496,289</u>



Division of Financial Regulation

The Division of Financial Regulation, in conjunction with OCI's Legal Unit, is responsible for enforcing the state's insurance laws related to insurers' financial condition. In compliance with s. 601.01 (5), Wis. Stat., the division works with other state, federal, and international regulatory agencies in carrying out the intent of Wisconsin's insurance laws and the agency's mission.

Monitoring includes the examination of records and review of prospective risk impacting the solvency of insurance companies organized under Wisconsin law and the analysis of financial statements of all insurers licensed to do business in the state of Wisconsin, the review of CPA audit reports, and updates to the company profile database. The division performs reviews of holding company filings required by ch. Ins 40, Wis. Adm. Code, corporate governance disclosures, risk solvency assessments, administers insurer applications to do business in Wisconsin, and processes merger and acquisition plans. The division also collects and processes all premium taxes submitted by insurers.

Major Accomplishments

- Maintained accreditation by the National Association of Insurance Commissioners
- Examined 49 domestic insurers
- Analyzed the financial statements of over 2,063 insurers and regulated entities
- Placed two companies into liquidation
- Closed one liquidation

Other activities include:

Domestic Insurers

- Licensed domestic entities:
 - Two property and casualty insurers
- Issued permits to two Care Management Organizations, under ch. 648, Wis. Stat.
- Reviewed and approved changes of control involving 18 domestic insurers, pursuant to holding company regulations
- Reviewed and approved the conversion of one property and casualty insurer to a domestic surplus lines insurer
- Redomiciled one company out of Wisconsin
- Transactions involving ch. 612 town mutual insurers
 - Reviewed and approved one town mutual merger
 - Reviewed and approved one town mutual merger into ch. 611 mutual insurer
 - Reviewed and approved the conversion of two town mutuals into ch. 611 mutual insurers
 - Reviewed and approved one group conversion to a ch. 611 mutual insurer that involved two town mutual insurers
 - After all town mutual transactions were completed, the number of town mutual insurers licensed in Wisconsin went from eight on January 1, 2024, to three on January 1, 2025.
- Approved the dissolution of five domestic insurance companies.

Nondomestic Insurers

- Licensed nondomestic entities:
 - 14 traditional insurers
 - Five life, accident, and health insurers
 - Eight property and casualty insurers
 - One title insurer
 - 17 property service contract providers
 - Nine vehicle protection product provider

Company Licensing Reviews

- Reviewed the financial statements for the Division of Market Regulation and Enforcement on licensing and renewing Employee Benefit Plan Administrators.

Reinsurer Reviews

- Reciprocal Jurisdiction Reinsurers
 - Approved eight
 - Renewed 41
- Certified Reinsurers
 - Approved one
 - Renewed 14

Continued Modernization of Processes

- Continued work with the OCI Information Systems Section to modernize agency data and eliminate several ad hoc spreadsheets and small databases that have become unstable as technology has advanced.
- Worked with OCI Information Systems Section to streamline importing a large volume of documents into the agency's document management system.

NAIC Activity

- Served on several NAIC task forces and working groups, including acting as chair of the Risk-Focused Surveillance Working Group and co-chair of the Financial Examiners Handbook Technical Group (complete list of NAIC groups listed on [page 30](#)).
- Chaired a drafting group to update guidance on reviewing affiliated investment management service agreements.
- Oversaw examination and analysis of Peer Review Projects

Draft: 3/25/2024

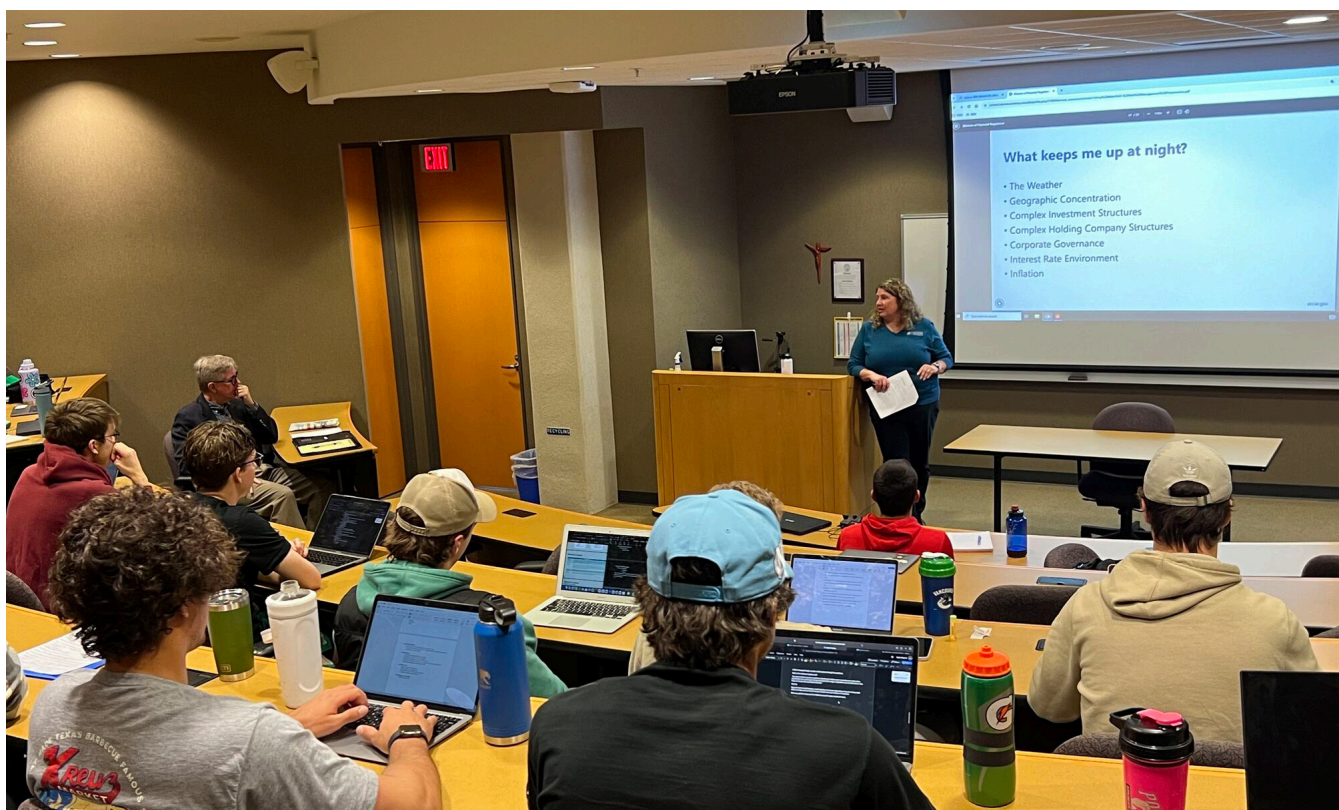
Financial Condition (E) Committee Technical Changes

Background Information. At the 2009 Fall National Meeting, the NAIC membership approved a new process for the final adoption of technical matters coming from the Financial Condition (E) Committee. The new process was enacted to provide these technical changes to the industry and affected parties as quickly as possible to allow them more time to modify their systems and processes for such changes.

Details of Process Adopted

1. A list of technical items (shown on the page[s] that follow) will be provided by the Financial Condition (E) Committee to the Executive (EX) Committee and Plenary within one week of the completion of the national meeting.
2. The list contains only what the Financial Condition (E) Committee considers technical and routine, and it does not include items that are significant by NAIC standards (e.g., it would not include proposed model laws, model regulations, or guidelines) or items considered controversial.
3. Members of the Executive (EX) Committee and Plenary have 10 days to review the attached list and voice any objection with respect to a specific item.
4. If no objections are raised on a particular item or any of the items, each and all items will be considered adopted by the Executive (EX) Committee and Plenary, similar to the consent agenda process.
5. If there is an objection to any one or multiple items, a joint meeting of the Executive (EX) Committee and Plenary will be scheduled to address the particular item(s).
6. Items receiving no objection will be considered adopted and thus inserted into the appropriate publication and/or made available to the industry and other parties for implementation.

Request for Approval. Under the above process, the Executive (EX) Committee and Plenary members are hereby requested to review the attached list and voice any objections to a specific item(s) by **April 5, 2024**. Any item(s) the issue.



Companies Examined

Alpha Property & Casualty Insurance Company
 BetterLife
 Bowhead Insurance Company, Inc.
 Chorus Community Health Plans, Inc.
 Common Ground Healthcare Cooperative
 Community Insurance Corporation
 Dairyland Insurance Company
 Dairyland National Insurance Company
 Dean Health Insurance, Inc.
 Dean Health Plan, Inc.
 Eagle Point Mutual Insurance Company
 Employers Insurance Company of Wausau
 Employees Mutual Benefit Association
 Everly Life Insurance Company
 Florists' Insurance Company
 Florists' Mutual Insurance Company
 Hawkeye-Security Insurance Company
 Homestead Mutual Insurance Company
 Independent Care Health Plan
 Jewelers Mutual Insurance Company, SI
 JM Specialty Insurance Company
 Liberty Mutual Fire Insurance Company
 Medica Community Health Plan
 Middlesex Insurance Company

Momentum Insurance Plans, Inc.
 Mutual of Wausau Insurance Corporation
 Parker Centennial Assurance Company
 Patriot General Insurance Company
 Peak Property and Casualty Insurance Corporation
 Point Excess and Surplus Insurance Company
 Point Insurance Company
 Point Specialty Insurance Company
 SECURA Insurance Company
 SECURA Select Insurance Company
 SECURA Supreme Insurance Company
 Sentry Casualty Company
 Sentry Insurance Company
 Sentry Life Insurance Company
 Sentry Select Insurance Company
 Southern Guaranty Insurance Company
 State Auto Insurance Company of Wisconsin
 Third Coast Insurance Company
 United Wisconsin Insurance Company
 Unitrin Safeguard Insurance Company
 Viking Insurance Company of Wisconsin
 Wausau Business Insurance Company
 Wausau General Insurance Company
 Wausau Underwriters Insurance Company
 Wisconsin County Mutual Insurance Corporation

Changes in Corporate Licenses

Insurance Corporations Domiciled in Other States Admitted	
January 1, 2024 – December 31, 2024	
Alaska National Insurance Company	Anchorage, AK
American Savings Life Insurance Company	Mesa, AZ
Aria Care Insurance Inc.	Overland Park, KS
Ascent Administration Services LLC	Tempe, AZ
Ascent Administration Services LLC	Mesa, AZ
Assurancy Enterprises, Inc.	Omaha, NE
Bankers Warranty Group, Inc.	St. Petersburg, FL
Blueshield Corp.	Brooklyn, NY
CRAST Inc	Marietta, GA
DB Insurance Company, LTD (US Branch)	Honolulu, HI
Dealer General Warranty, Inc.	Lakeland, FL
Dealer General Warranty, Inc.	Lakeland, FL
Delaware Life and Annuity Company	Zionsville, IN
DHI Title Insurance Company	Austin, TX
Diamond Home Protection, LLC	O'Fallon, IL
Echelon Innovations, LLC	O'Fallon, IL
First Founders Assurance Company	Chester
Gold Key Warranty LLC	Goldsby, OK
GS Administrators, Inc.	Houston, TX
HomeSure of America, Inc.	Boca Raton, FL
Horizon Obligor Services Corp.	Jersey City, NJ
Horizon Obligor Services Corp.	Jersey City, NJ
Independence Pet Insurance Company	Scottsdale, AZ
InsuraGuest, Inc.	Salt Lake City, UT
Maine Employers' Mutual Insurance Company	Portland, ME
National Auto Assurance II, Inc.	Minnetonka, MN

Insurance Corporations Domiciled in Other States Admitted

January 1, 2024 – December 31, 2024

National Security Insurance Company	Elba, AL
Norman & Company, Inc.	Tampa, FL
Pessada Holdings, LLC	Chesterfield, MO
Progressive Life Insurance Company	Cleveland, OH
PWC Warranty Services, Inc.	Coeur d'Alene, ID
PWC Warranty Services, Inc.	Coeur d'Alene, ID
Samsung Fire & Marine Management Corporation	Ridgefield Park, NJ
Titan Warranty Administration, Inc.	Spring, TX
Torque Group LLC	Evansville, IN
USAA Falcon Property & Casualty Insurance Company	San Antonio, TX
Vision Benefits of America II, Inc.	Carnegie, PA
VSC Operations, LLC	McKinney, TX
Wal-Mart Stores East, LP	Bentonville, AR
Wingsail Insurance Company	Bedminster, NJ

Organizations Licensed as Care Management Organizations

January 1, 2024 – December 31, 2024

None

Organizations Licensed as Service Contract Providers

January 1, 2024 – December 31, 2024

Ascent Administration Services LLC	Tempe, AZ
Assurancy Enterprises, Inc.	Omaha, NE
Bankers Warranty Group, Inc.	St. Petersburg, FL
Blueshield Corp.	Brooklyn, NY
CRAST Inc	Marietta, GA
Dealer General Warranty, Inc.	Lakeland, FL

Organizations Licensed as Service Contract Providers

January 1, 2024 – December 31, 2024

Diamond Home Protection, LLC	O'Fallon, IL
Echelon Innovations, LLC	O'Fallon, IL
Gold Key Warranty LLC	Goldsby, OK
HomeSure of America, Inc.	Boca Raton, FL
Horizon Obligor Services Corp.	Jersey City, NJ
InsuraGuest, Inc.	Salt Lake City, UT
Norman & Company, Inc.	Tampa, FL
PWC Warranty Services, Inc.	Coeur d'Alene, ID
Samsung Fire & Marine Management Corporation	Ridgefield Park, NJ
VSC Operations, LLC	McKinney, TX
Wal-Mart Stores East, LP	Bentonville, AR

Changed Company Type

Bloomington Farmers Mutual Insurance Company	Property and Casualty
Green County Mutual Insurance Company	Property and Casualty
Mt. Pleasant-Perry Middleton Insurance Company	Property and Casualty
Point Excess and Surplus Insurance Company	Domestic Surplus Lines
Reedsburg-Westfield Mutual Insurance Company	Property and Casualty
River Valley Mutual Insurance Company	Property and Casualty
Sugar Creek Mutual Insurance Company	Property and Casualty
Theresa Mutual Insurance Company	Property and Casualty
Wisconsin River Mutual Insurance Company	Property and Casualty

Insurance Corporation Mergers, Dissolutions, Withdrawals, Rehabilitations, Liquidations, Revocations, Redomestications or Name Changes

January 1, 2024 – December 31, 2024

Mergers		
Non-Surviving Company Name	Merged into Surviving Company Name	Date
All-Star/Newark Mutual Insurance Company	Riverside Mutual Insurance Company	1/1/2024
Ashland County Town Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Assured Guaranty Municipal Corp.	Assured Guaranty Inc.	8/1/2024
Athene Annuity & Life Assurance Company	Athene Annuity and Life Company	10/11/2024
Baraboo Mutual Insurance Company	Reedsburg-Westfield Mutual Insurance Company	1/1/2024
Bristol Town Insurance Company	Forward Mutual Insurance Company	1/1/2024
Caledonia Mutual Fire Insurance Company	Central Wisconsin Mutual Insurance Company	1/1/2024
Clarno Mutual Insurance Company	Mt. Morris Mutual Insurance Company	1/1/2024
Columbus Mutual Town Insurance Company	Central Wisconsin Mutual Insurance Company	1/1/2024
Darlington Mutual Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Dupont Mutual Insurance Company	Maple Valley Mutual Insurance Company	1/1/2024
Encova Life Insurance Company	Pan-American Life Insurance Company	1/1/2024
Harleysville Lake States Insurance Company	Harleysville Insurance Company	1/1/2024
Heartland Mutual Insurance Company	Arlington Mutual Insurance Company	7/1/2024
Helenville Mutual Insurance Company	Central Wisconsin Mutual Insurance Company	1/1/2024
Henrietta, Greenwood & Union Mutual Fire Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Kenosha County Mutual Insurance Company	Mt. Morris Mutual Insurance Company	12/31/2024
Liberty Mutual Fire Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Medina Mutual Insurance Company	Sugar Creek Mutual Insurance Company	1/1/2024
Mt. Pleasant-Perry Middleton Mutual Insurance Company	Mt. Morris Mutual Insurance Company	12/31/2024
New Hope Mutual Insurance Company	Seneca, Sigel Mutual Insurance Company	1/1/2024

Mergers (continued)		
Non-Surviving Company Name	Merged into Surviving Company Name	Date
Northern Finnish Mutual Insurance Company	Mt. Morris Mutual Insurance Company	1/1/2024
Price County Town Mutual Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Racine County Mutual Insurance Company	Mt. Morris Mutual Insurance Company	1/1/2024
River Falls Mutual Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Spring Grove Mutual Insurance Company	La Prairie Grove Mutual Insurance Company	1/1/2024
Stockholm Town Mutual Insurance Company	River Valley Mutual Insurance Company	1/1/2024
Tri-County Mutual Town Insurance Company	Mt. Morris Mutual Insurance Company	1/1/2024
Wisconsin Collaborative Insurance Company	Blue Cross Blue Shield of Wisconsin	6/1/2024
Woman's Life Insurance Society	Trusted Fraternal Life	9/1/2024

Dissolutions	
Company Name	Date
American Dental Plan of Wisconsin, Inc.	12/31/2024
Dental Com Insurance Plan, Inc	5/15/2024
My Choice Wisconsin Health Plan Inc.	12/31/2024
Policyholders Mutual Insurance Company	7/2/2024
Time Insurance Company	11/5/2024

Withdrawals	
Company	Date
Action Powersports, Inc.	12/31/2023*
Aftercare, Inc.	12/31/2024
American Assurance Co. 2, Inc.	12/31/2023*
Bankers Warranty Group, Inc.	3/12/2024
GoPro Care, Inc.	12/31/2023*
HSB Secure Services, Inc.	12/31/2024
HUB International Midwest Limited	7/11/2024
Johnson Ford of New Richmond, Inc.	12/31/2024

Withdrawals (continued)	
Company	Date
Johnson Motor Sales, Inc.	12/31/2023*
Johnson Motors of Menomonie	12/31/2023*
Johnson Motors of St Croix Falls, Inc.	12/31/2023*
Michigan Professional Insurance Exchange	12/5/2024
Milwaukee Service Contract Corporation	5/28/2024
Minnehoma Automobile Association, Inc.	12/31/2023*
North Central Warranty Company, Inc.	12/31/2023*
Order of United Commercial Travelers of America	8/23/2024
PermaPlate Company, LLC	12/31/2022*
Previsor Insurance Company	5/1/2024
Professionals Advocate Insurance Company	12/31/2024
Safe-Guard Products International, LLC	12/31/2023*
Securranty, Inc.	12/31/2023*
Sleepy Hollow Chevrolet-Buick-GMC, Inc.	12/31/2023*
Sleepy Hollow Chrysler Dodge Jeep, Inc.	12/31/2024
Titan Warranty Administration, Inc.	8/30/2024
TWG Innovative Solutions, Inc.	12/31/2023*
Universal Underwriters Service Corporation	12/31/2023*
Warranty Solutions Administrative Services, Inc.	12/31/2024

* Information not reported in prior Wisconsin Insurance Report

Rehabilitations	
Company	Date
Columbian Mutual Life Insurance Company	8/13/2024
Gateway Insurance Company	5/20/2024
PHL Variable Insurance Company	6/13/2024

Liquidations	
Company	Date
1 st Auto & Casualty Insurance Company	1/1/2024
Arrowood Indemnity Company	11/8/2023*
Colorado Bankers Life Insurance Company	11/30/2024
Wisconsin Reinsurance Corporation	1/1/2024

* Information not reported in prior Wisconsin Insurance Report

Revocations	
Company	Date
Global Administrators, LLC (VPP)	4/30/2024

Redomestications			
Company	From	To	Effective Date
American Memorial Life Insurance Company	SD	IA	12/31/2024
American National General Insurance Company	MO	NE	12/10/2024
American National Property and Casualty Company	MO	NE	12/10/2024
American Strategic Insurance Corp	FL	IN	4/11/2024
Argonaut Great Central Insurance Company	IL	NE	10/7/2024
Argonaut Insurance Company	IL	NE	10/7/2024
Argonaut-Midwest Insurance Company	IL	NE	10/7/2024
Aurora National Life Assurance Company	CA	MO	7/1/2024
AXA XL Insurance Company Americas	TX	DE	7/10/2024
Colony Specialty Insurance Company	IL	NE	10/7/2024
Fortitude Casualty Insurance Company	OH	AZ	4/11/2024
Guarantee Trust Life Insurance Company	IL	NE	3/19/2024
HDI Global Select Insurance Company	IN	IL	11/18/2024
HealthSpring Life & Health Insurance Company	TX	IL	12/23/2024
National Western Life Insurance Company	CO	AZ	7/2/2024
Pacific Indemnity Company	WI	DE	7/1/2024

Redomestications (continued)			
Company	From	To	Effective Date
Protective Life Insurance Company	TN	NE	12/31/2024
Union Security Insurance Company	KS	IA	12/31/2024
United National Life Insurance Company of America	IL	NE	3/19/2024
Vantis Life Insurance Company	CT	DE	11/25/2024
Watford Insurance Company	NJ	MO	1/3/2024
WCF Select Insurance Company	CA	UT	7/1/2024
Western United Life Insurance Company	WA	TX	3/28/2024

*Information not available in prior Wisconsin Insurance Report.

Name Changes	
Previous Name	New Name
Agents National Title Insurance Company	Essent Title Insurance, Inc.
Amrock Title Insurance Company	Rocket Title Insurance Company
Assured Guaranty Corp.	Assured Guaranty Inc.
Blackboard Insurance Company	Glatfelter Insurance Company
Catholic Financial Life	Trusted Fraternal Life
Catlin Insurance Company, Inc.	AXA XL Insurance Company Americas
CM Select Insurance Company	MGT Insurance Company
Electric Insurance Company	RiverStone International Insurance, Inc.
Franklin Farmers Mutual Insurance Company	Riverside Mutual Insurance Company
Grinnell Mutual Reinsurance Company	Grinnell Mutual Reinsurance Company, SI
Hastings Mutual Insurance Company	Hastings Insurance Company
Indiana Lumbersmens Insurance Company	HDI Global Select Insurance Company
LaPrairie Mutual Insurance Company	La Prairie Grove Mutual Insurance Company
Lombard International Life Assurance Company	Axcelus Financial Life Insurance Company
Michigan Commercial Insurance Mutual	iQUE Insurance Company
Midwest Builders' Casualty Mutual Company	Waypoint Mutual
Road, Track & Trail, LLC	SRTT, LLC

Name Changes

Previous Name	New Name
Transverse Insurance Company	MS Transverse Insurance Company
West Bend Mutual Insurance Company	West Bend Insurance Company
Western United Life Assurance Company	Western United Life Insurance Company



Companies in Liquidation or Rehabilitation

Time Insurance Company, in Liquidation

Time Insurance Company (Time) was placed into liquidation effective September 1, 2022. Before liquidation, Time was placed into rehabilitation on July 29, 2020, by Judge Stephen E. Ehlke of the Dane County Circuit Court. The court appointed Wisconsin Commissioner of Insurance Mark V. Afable, and his successor in office or any delegates as Rehabilitator, and Mark H. Femal, as Special Deputy Commissioner.

Time is a Wisconsin domestic, stock, life, accident, and health insurance company. Time was originally licensed as an insurer on February 4, 1910, and over the years wrote direct business of life, annuities, long-term care, and various health products, with the later years focusing solely on health insurance. When Time was actively writing business, it was licensed in all states except New York, the District of Columbia, and Puerto Rico. In late 2014, the ultimate controlling person of Time, Assurant, Inc., decided to exit the accident and health segment of the insurance market to focus on other business segments, and it made the decision to discontinue operations of Time and put the company into run-off. Since 2014, Time has been in runoff with many of its policies covered under a 100% coinsurance basis with financially strong and accredited reinsurers. At the time of rehabilitation, Time had approximately 100 policies that were not covered by any reinsurance.

On October 7, 2018, the Office of the Commissioner of Insurance (OCI) approved the acquisition of Time by Haven Holdings, Inc. (Haven), its redomestication to Puerto Rico, and its merger with Haven Insurance Company II, with Time being the survivor of the merger. In Puerto Rico, Time was licensed under the name of Time Insurance Company II. On December 5, 2018, the Puerto Rico Office of the Commissioner of Insurance (PR OCI) approved the acquisition, merger, and redomestication, and approved the surviving entity, Time Insurance Company II, as a Class 5 International Insurer.

Following the redomestication and merger, Time began efforts to recapture its fully reinsured life and long-term care policies. On July 2, 2019, Time filed a transaction with PR OCI to recapture the long-term care block of business reinsured by John Hancock Life Insurance Company (John Hancock). On July 16, 2019, OCI issued a cease-and-desist order preventing the reinsurance recapture transaction and preventing Time from writing new business in the state of Wisconsin. Several other states issued similar cease-and-desist orders.

In December 2019, OCI amended its cease-and-desist order that continued to prohibit Time from engaging in any reinsurance recapture transaction and found that the transfer of risk for the long-term care policies from a solvent reinsurer to a financially distressed, international insurer was not in the best interest of Wisconsin insureds and the public. States continued to object to the recapture transaction, preventing Time from completing the recapture. Time then indicated that it would seek to convert from a Puerto Rico International Insurer and redomicile as a life, accident, and health insurer in another U.S. jurisdiction.

On February 28, 2020, the Acting Puerto Rico insurance commissioner, Time, and the Wisconsin insurance commissioner agreed that Time would redomesticate back to Wisconsin pursuant to a stipulation and ordered that included Time potentially entering a retrocession transaction for the long-term care insurance block. Time redomesticated back to Wisconsin, and OCI reissued a Certificate of Authority for Time Insurance Company as a Wisconsin domestic insurer effective February 28, 2020. On May 6, 2020, PR OCI confirmed the redomestication. The stipulation and order were then amended on March 31, 2020, allowing Time to propose alternative forms of the transaction.

On March 12, 2020, Time submitted a plan to OCI where the key component was a novation transaction where the existing reinsurance agreement could be novated to Haven Reinsurance (an affiliate of Haven), and Haven Reinsurance would assume all obligations under the reinsurance agreement. On May 15, 2020, OCI determined

the proposal was contrary to the interest of policyholders, Time's creditors, and the public. Under the submitted plan, the long-term care reinsurer would no longer be obligated to bear any risk, and the transaction was dependent on the capital and surplus of Time and Haven Reinsurance, which OCI determined there would be insufficient surplus available to support the reserves.

On May 18, 2020, OCI petitioned the Court to place Time into rehabilitation, which was ordered on July 29, 2020. On September 25, 2020, the commissioner filed a proposed Rehabilitation Plan that was approved on October 15, 2020. The plan included working with reinsurers to enter assumption agreements for the blocks of business they reinsured. The commissioner entered into assumption agreements as follows:

Reinsurer	Type of Policy	Effective Date	Policyholders
National Health Insurance Company	Health and Life	October 1, 2020	92,356
Assurity Life Insurance Company	Disability	November 1, 2020	12
Loyal American Life Insurance Company	Medicare Supplement	February 1, 2021	55
John Hancock Life Insurance Company (USA)	Long-Term Care	July 1, 2022	25,020
Talcott Resolution Life and Annuity Insurance Company	Life and Annuities	July 1, 2022	47,638

After the reinsurers assumed the blocks of business they were reinsuring, OCI filed to place Time into liquidation on July 13, 2022, with an effective date of September 1, 2022. On August 30, 2022, Judge Stephen E. Ehlke of the Dane County Circuit Court signed the order approving the end of the rehabilitation and putting Time into liquidation. Proof of claims against the estate were due by March 1, 2023.

The liquidator received a total of 29 proofs of claim, broken down by the highest applicable level of priority, as follows:

# of Claims	Claim Level	Amount of Claim	Allowed Amount of Claim
1	Class 1 Proofs of Claim (Administration Costs)	\$1,729,012	\$1,729,012
15	Class 3 Proofs of Claim (Loss Claims)	\$4,480,937	\$1,699,566
10	Class 5 Proofs of Claim (Residual Classification with Some Security)	\$2,355,405	\$2,176,560
2	Class 8 Proofs of Claim (Miscellaneous)	\$1,278	\$1,278
1	Class 8 Proof of Claim (Late Filed)	\$576,199	\$576,199

Assets of the liquidation estate were distributed on June 25, 2024, and November 5, 2024. The distribution of assets paid all Class 1 and Class 3 allowed claim amounts, and 67% of allowed Class 5 claims were paid. There were no payments on Class 8 claims because of insufficient assets in the estate. On November 5, 2024, all remaining administrative expenses for the liquidation were paid. The nominal amount (\$21,977) of funds remaining in the estate after the distribution and payment of administrative expenses was transferred to the Common School Fund. Time Insurance Company was dissolved on November 5, 2024.

Wisconsin Reinsurance Corporation, in Rehabilitation and 1st Auto & Casualty Insurance Corporation, in Liquidation

Wisconsin Reinsurance Corporation (WRC) and 1st Auto & Casualty Insurance Company (1st Auto) were placed into liquidation effective January 1, 2024. Before liquidation, WRC and 1st Auto were placed into rehabilitation by Judge Stephen E. Ehlke of the Dane County Circuit Court effective June 21, 2023. The court appointed Nathan Houdek, and his successors in office, or any of their delegees, as Rehabilitator, and Justin C. Schrader as Special Deputy Commissioner.

WRC was incorporated on December 15, 1972, as a mutual reinsurance company under the name of Mutual Spread Loss Reinsurance, Inc. (MSLR), the successor to Mutual Spread Loss Association, which was organized in 1942 to be a mechanism where each member insurer ceded excess loss risks and participated in pooled reinsurance assumption. On December 31, 1982, Wisconsin Town Mutual Reinsurance Company merged into MSLR and subsequently changed the name of MSLR to Wisconsin Reinsurance Corporation. WRC converted from a mutual to a stock company effective January 1, 1991.

1st Auto was organized in 1991 and commenced business on September 25, 1991, as a wholly-owned subsidiary of WRC.

WRC is a property and casualty reinsurance company whose clients are mutual insurance companies located in Arkansas, Illinois, Indiana, Iowa, Missouri, Montana, North Dakota, South Dakota, and Wisconsin. In Wisconsin, WRC was the reinsurer for 34 of Wisconsin's 44 town mutual insurers. As part of WRC, 1st Auto offered direct coverage for personal auto, business auto, and personal/farm umbrella to approximately 23,000 policyholders in Arkansas, Illinois, Iowa, Missouri, South Dakota, and Wisconsin, with the vast majority being in Illinois, Missouri, and Wisconsin.

Many Wisconsin insurers, including WRC, experienced higher-than-expected losses in 2022 as severe storms damaged property across the state. By the end of the year, WRC and 1st Auto reported that they did not have the financial stability to continue operating and to meet their obligations in the foreseeable future.

In 2023, efforts to find additional capital to stabilize the financial position for WRC and 1st Auto did not materialize while their financial position continued to deteriorate. Due to these developments, the Office of the Commissioner of Insurance (OCI) determined it was appropriate to take action to protect 1st Auto's policyholders and town mutual insurers who get reinsurance from WRC by controlling the assets of the company through a rehabilitation process.

On July 11, 2023, the Rehabilitator filed a Rehabilitation Plan with the court to rehabilitate WRC and 1st Auto, which was approved by the court on July 27, 2023. The Rehabilitation Plan included:

- WRC
 - Transition from a reinsurer of the town mutual industry to a direct writer of insurance policies, and
 - Administer a reinsurance pool of town mutual insurance companies.
- 1st Auto
 - Continue to re-underwrite its book of business under improved underwriting standards, and
 - Seek rate increases where appropriate.

There was no interest expressed in the Rehabilitation Plan from July through October, resulting in the Rehabilitator determining that the Rehabilitation Plan was not viable. On November 1, 2023, the Rehabilitator filed a Petition to Terminate Rehabilitation and for Order for Liquidation with the court. The liquidation of WRC and 1st Auto was granted with an effective date of January 1, 2024. Proof of claims against the estate were due by July 1, 2024.

The liquidator received a total of 788 proofs of claims, tentatively broken down by the highest level of priority as of December 31, 2024, which is subject to revision by the liquidator as follows:

Quantity		Amount		Proof of Claim Class
WRC	1 st Auto	WRC	1 st Auto	
1	6	\$ 1,539,769	\$2,726,685	Class 1 – Administrative Costs
259	234	13,887,915	5,209,844	Class 3 – Loss Claims
53	114	1,892,378	457,832	Class 4 – Unearned Premium
12	73	81,681	305,210	Class 5 – Residual Classification with Some Security
		313,080		Class 7 – Interest on Claims Already Paid
		719	1,388	Class 8 – Miscellaneous*
10	24	44,000	37,866	Class 8 – Late Filed
2				Class 11 - Stock

*This is the miscellaneous portion of proof of claims in other priority levels.

On November 27, 2024, the liquidator filed with the court a Motion to Approve Certain Disbursements of Class 1 and Class 3 claims. The motion requested approval to pay all WRC Class 1 outstanding administrative expenses and to pay all future Class 1 expenses as they are incurred; and allowable Class 3 loss claims at 50% of the allowed amount. For 1st Auto, the motion requested to pay all 1st Auto outstanding administrative expenses and to pay all future Class 1 expenses as they are incurred. The motion was approved on December 13, 2024, with the first distributions made in 2025.

As of December 31, 2024, the financial status of WRC and 1st Auto could only be estimated with substantial deficiencies in the availability of information that was beyond the liquidator's control. As time progresses, it is anticipated that the financial statements will attain improved accuracy, as settlement amounts are finalized and state guaranty funds, direct claimants of WRC and 1st Auto not eligible for guaranty fund coverage, and creditors. Subject to the foregoing qualifications, as of December 31, 2024, Wisconsin Reinsurance Corporation, and 1st Auto & Casualty Insurance Company had:

	WRC	1 st Auto
Assets	\$28,184,965	\$10,198,076
Liabilities	17,759,543	8,738,825
Surplus	10,425,422	1,459,250
Net Income (Loss)	(7,256,079)	(6,518,406)



Division of Market Regulation and Enforcement

The Division of Market Regulation and Enforcement (DMR) consists of five sections: Consumer Affairs, Rates and Forms, Market Analysis, System Support, and Agent Licensing.

The Division of Market Regulation and Enforcement is responsible for the administration and enforcement of laws and rules relating to all market conduct activities of insurers and agents. To complete its duties, the division conducts market analysis and targeted market conduct examinations of insurers in the areas of:

- underwriting and rating
- marketing, advertising, and sales
- claims
- form review
- policyholder services and grievances.

In 2024, the division investigated and resolved 3,417 written consumer complaints and inquiries and answered over 23,000 telephone or email inquiries. The division received 3,201 rate and rule filings, 4,285 form filings, and 325 advertising material filings.

Major Accomplishments

Market Conduct Certification

The NAIC Market Certification Working Group finished the development of a Market Regulation Certification program. 2024 was the first year state departments of insurance were able to self-certify compliance with the program. Wisconsin was among the first states to submit the required documentation and become certified. The program will continue to develop going forward.

Outreach

Consumer Affairs continued to seek opportunities to provide education and outreach. This includes a new and growing collaboration with the Milwaukee Public Library, and continued partnerships with the Department of Health Services and Covering Wisconsin. In 2024, Consumer Affairs participated in 23 outreach events in a variety of settings, including consumer education events, trainings for industry representatives and consumer advocates, disaster response resource centers, and participation on expert panels. OCI's presence provided opportunities for increased awareness of the office and its role in insurance regulation to over a thousand collective attendees.

Remote Exam Proctoring

OCI continues to make remote proctoring for agent licensing exams available. As in previous years, over half of the exams taken in 2024 used the remote proctoring platform.

Provided 150 Collaborative Reports

The division provided 150 domestic company market regulation analysis reports for the Division of Financial Analysis examinations. OCI continues to refine the use of the OnBase information management platform to improve the sharing of intra-divisional reports between the Financial and Market Regulation divisions.





Consumer Reports

Division staff are responsible for the updating and revision of a variety of consumer publications available from OCI.

Centers for Medicare & Medicaid Services

Division staff continued the collaboration with the federal Centers for Medicare & Medicaid Services to respond to insurer, agent, and consumer questions regarding ongoing changes to the federal Affordable Care Act.

NAIC Activity

- Participated in the NAIC Market Certification Working Group to help facilitate the development of market conduct certification standards.
- Participated in the Market Conduct Annual Statement program, collecting and analyzing data on claims, complaints, and underwriting in life, annuities, health, LPI, private flood, homeowners, and auto insurance, and using the data in our market analysis process.
- Served on several NAIC committees, task forces, and working groups, including active roles in the Market Conduct Annual Statement (MCAS) Blanks Working Group, the Mental Health Parity and Addiction Equity Act Working Group, and the NAIC Market Regulation Handbook Working Group.
 - A complete list of NAIC committees, task

forces, and working groups where OCI is an active participant is on [page 32](#).

Meeting Participation and Assistance

Staff participated in the Wisconsin Insurance Plan and the Wisconsin Automobile Insurance Plan meetings, quarterly meetings with the Worker's Compensation Rating Bureau and the Department of Workforce Development, and provided technical assistance to Wisconsin Emergency Management.

Market Conduct Annual Statement

The Market Conduct Annual Statement (MCAS) is an analysis tool that state regulators use to review the market activity of the entire insurance marketplace and to identify companies whose practices fall outside normal/average ranges. If the MCAS shows that a company is an outlier in one or more areas, the Market Analysis group will review for potential action along the regulatory continuum, including follow-up interrogatories or a Level 1/Level 2 review. The project collects data on an industry-wide basis.

Currently, there are nine individual statements: Annuity, Life, Health, Disability Income, Homeowners, Private Passenger Auto, Long-Term Care, Lender-Placed Home/Auto, and Private Flood. In 2023, travel Insurance and short-term limited duration insurance were reported for the first time with 2022 data.

The table below shows the number Market Conduct Annual Statements that were expected to be filed and those filings received as of the time this report was compiled. The received filings may differ from the expected filings because of requested filing extensions or waivers:

Line of Business	Expected Filings	Filings received as of 08/1/25
Health	35	25
Disability Income	70	69
STLD	8	7
Other Health	92	84
Life	202	199
Annuity	120	118
LTC	68	65
Private Passenger Auto	130	126
Homeowners	132	124
Lender Placed	12	12
Private Flood	6	5
Travel	16	16
Pet	22	22

Market Analysis Section

The Division's Market Analysis section is responsible for monitoring the insurance market to identify issues through Level 1 and Level 2 company reviews, Market Conduct Annual Statement analysis, desk audits, and market conduct examinations. Market analysis of insurers is performed under a process established by NAIC. Market analysis includes a review of information collected in the financial statements and other NAIC databases to identify companies for

additional review. Examiners conducted additional reviews, identified companies for further action, and recorded the results of the reviews in the NAIC Market Analysis Review System (MARS). This process is used to identify companies for further review, up to and including market conduct examinations.

Level 1 and Level 2 Market Analysis

Analysis was completed on 32 insurance companies for 12 lines of business: group accident and health, group annuity, group life, homeowners, individual accident and health, individual annuity, individual life, long-term care, Medicare supplement, private passenger auto, worker's compensation, and medical professional liability.

Market Conduct Annual Statement (MCAS) and Market Analysis Prioritization Tool (MAPT) Baseline Analysis

Analysis was completed on 1,869 companies for eight lines of business: individual accident and health, private passenger auto, homeowners, individual life, group life, individual annuity, group annuity, and long-term care.

Grievance Report Analysis

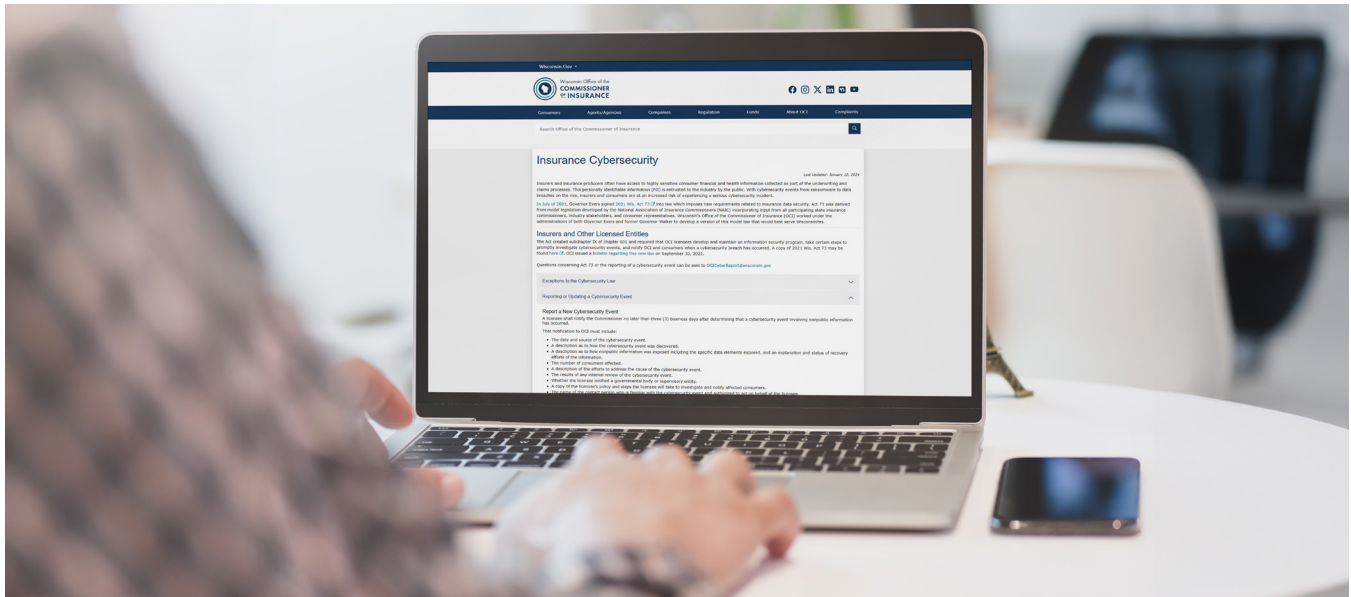
Analysis was completed on 22 companies regarding their annual grievance report submissions. This analysis included but was not limited to overturn rates, the types/categories of grievances, and any increase or decrease in the number of grievances received from prior years.

ACA Formulary Review

Analysis was completed regarding the coverage of biologic and biosimilar prescription drugs on 14 companies for the lines of business individual health and small group health.

Analysis Trends

Market Analysis has identified trends to monitor regarding cybersecurity, the use of artificial



intelligence, pharmacy benefit manager operations, and network adequacy.

Market Analysis currently monitors cybersecurity breaches reported to OCI by insurers. The section is participating in the development of an online reporting tool for security incidents. They also participate in the annual cybersecurity certification process and have developed an interrogatory specifically for cybersecurity.

Market Analysis Internship

Market Analysis hosted an intern from the University of Wisconsin for the 2024 fall semester. The intern focused on complaint analysis regarding homeowners roof-related complaints and private passenger auto underinsured and bodily injury-related complaints.

Form Submissions and Rate Filings

The following tables summarize the form submission data for 2023 and 2024. Table I shows the number of form submissions received in 2023 and 2024 by line of business for each type of insurance. Table II shows the number of rate filings received for each type of insurance.

Table I - Number of Form Submissions Received - By Line of Business in 2023 and 2024

Product Category	Total for 2023	Total for 2024
Health and Life		
Continuing Care Retirement Community	4	1
Credit Life	7	3
Group Accident and Health	216	206
Group Annuity	52	48
Group Life	28	23

Product Category	Total for 2023	Total for 2024
Health and Life – Other	133	109
Health Maintenance Organization	156	150
Individual Accident and Health	67	80
Individual Annuity	91	57
Individual Life	16	28
Group Long-Term Care	6	5
Individual Long-Term Care	5	6
Long-Term Care – Other	1	2
Annuities – Other	26	19
Total Health and Life	<u>808</u>	<u>737</u>
Property and Casualty		
Aviation	31	30
Bonds	121	85
Commercial Property and Multiperil	327	292
Commercial Motor Vehicle	228	162
Credit Property	7	13
Homeowner's	205	199
Inland Marine	180	202
Liability	1,315	907
Mortgage Guaranty	3	2
Other Lines	1,208	1,212
Personal Farm owners	63	36
Personal Motor Vehicle	72	124
Property	173	192
Public Adjuster contract	46	54
Title	18	16
Worker's Compensation	9	22
Total Property and Casualty	<u>3,960</u>	<u>3,548</u>
Grand Total	<u>4,768</u>	<u>4,285</u>

Table II - Rate Filings Received

Product Category	Total for 2024
Accident and Health Section	
Credit Life	1
Health Maintenance Organization	68
Health – Other	66
Group Long-Term Care	4
Individual Long-Term Care	29
Medicare Supplement	172
Long Term Care – Other	7
Total Accident and Health Section	<u>347</u>
Property and Casualty Section	
Aviation	12
Bonds	102
Commercial Property and Multiperil	345
Commercial Motor Vehicle	322
Credit Property	17
Homeowners	324
Inland Marine	67
Liability	652
Mortgage Guaranty	0
Other Lines	115
Personal Farmowners	57
Property	260
Personal Motor Vehicle	272
Title	24
Worker's Compensation	<u>15</u>
Total Property and Casualty Section	<u>2,854</u>
Grand Total	<u>3,201</u>

Table III - Form/Rate Filings Received

Product Category	Total for 2024
Individual Health – Dental	10
Individual Health – Disability Income	16
Individual Health – Hospital Indemnity	7
Individual Health - Other	17
Individual Long-Term Care	5
Long-Term Care – Other	1
Indiv. Medicare Supp. – Standard Plans 2010	0
Medicare Supp – Other 2010	<u>2</u>
Total Form/Rate Filings	<u>58</u>

Table IV - Advertising Filings

Product Category	Total for 2024
Individual Long-Term Care	8
Individual Health – Other	2
Med. Supp. – Other	19
Indiv. Med. Supp. – Medicare Select 2010	8
Medicare Supplement - Other 2010	<u>288</u>
Total Advertising Filings	<u>325</u>

Consumer Affairs Section

The Consumer Affairs section is responsible for responding to inquiries and for investigating complaints filed against insurance companies and agents. The section works closely with legal counsel to pursue enforcement actions when appropriate. In 2024, 324 complaint investigations resulted in referrals to the legal unit for possible enforcement action.

In 2024, property and casualty insurance was the type of insurance with the most complaints, followed by health insurance. Among property and casualty inquiries and complaints received, the majority were related to homeowners insurance. Among health insurance complaints received, the majority were related to group health insurance coverage. A considerable majority of complaints received across both coverage areas were related to claim handling. These complaint patterns have remained relatively unchanged for several years.

In 2024, the Consumer Affairs section participated in 23 outreach events, including consumer education events, training events for industry representatives and consumer advocates, disaster response resource centers, and presentations or panel participation at industry events. OCI continues to seek partnerships and build collaborative

relationships to increase opportunities for community engagement, advocacy, and education for Wisconsin insurance consumers.

OCI continues to encourage insurance companies to register for access to our online complaint portal. By the end of 2024, 870 insurance companies had registered for complaint portal access. OCI’s complaint portal allows insurance companies to receive electronic notification of an insurance complaint and review and respond to the complaint. This reduces delays related to physical mail delivery and helps facilitate remote work options for OCI and insurers.

The following tables summarize the 2024 complaint data.

Table I shows complaint activity over the last six years. A complaint may be closed in a different year than it is received. A complaint is defined as a written expression of dissatisfaction with a regulated insurance entity, such as a company, agent, pharmacy benefit manager, or public adjuster. Contact may initially be received in person, by telephone, by email, or in writing, but to be considered a formal complaint initiating an investigation, the complaint must be in writing. The data presented reflects formal complaints.

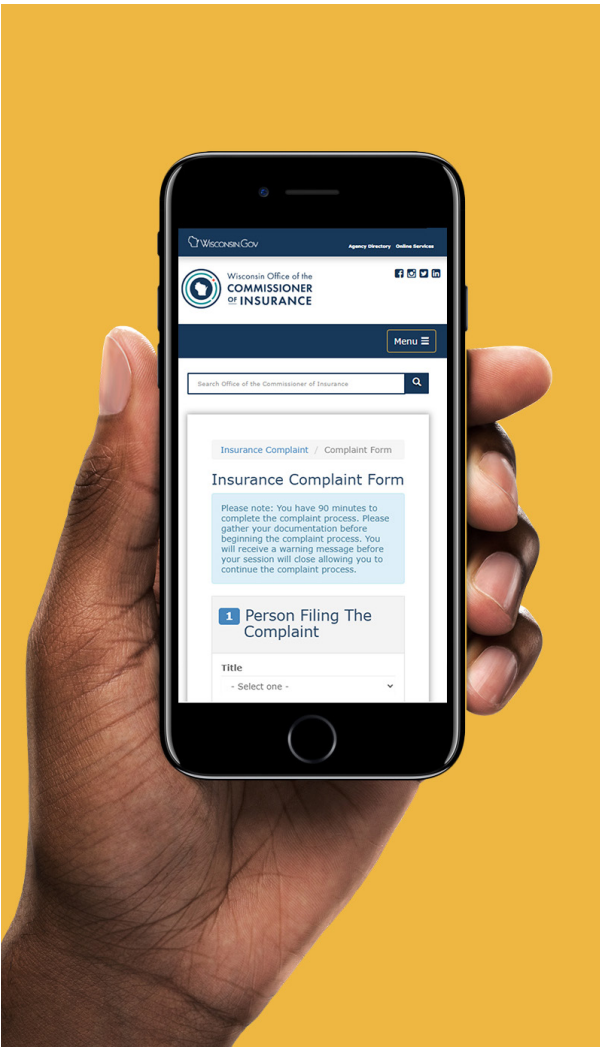


Table I - Total Complaint Files

Year	Received	Closed
2019	2,806	3,277
2020	2,570	2,977
2021	2,137	2,451
2022	2,469	2,671
2023	2,888	3,116
2024	3,232	3,417

In addition to formal complaints received, the division also handled 23,000 phone calls, emails, and written requests for information in 2024.

Table II shows 2023 and 2024 complaints by type of insurance.

Table II - Complaints Filed By Type of Insurance*

Type of Insurance	2023	2024
Accident and Health		
Group Accident and Health	456	429
Individual Accident and Health	319	456
Medicare Supplement	112	111
Long-Term Care	52	53
Total Accident and Health	939	1,049
Property and Casualty		
Automobile	590	613
Homeowners, Tenants, Farmowners	597	697
Fire, Allied Lines, Other Property	57	69
General Liability/Liability	40	63
Worker's Compensation	54	85
All Other Lines	216	206
Total Property and Casualty	1,554	1,733
Life, Including Credit and Annuities	385	437
Grand Total	2,878	3,219

Table III shows the general reason the complaint was filed. Fifty-eight percent of the complaints involved claim handling concerns. Policyholder service was the second most common complaint reason at approximately 21%.

Table III - Reasons for Complaints*

Basis for Complaint	Through 4th Quarter 2023	% of Total	Through 4th Quarter 2024	% of Total
Claim Handling	1,984	61.6%	2,116	58.4%
Policyholder Service	604	18.7%	768	21.2%
Marketing and Sales	391	12.1%	479	13.2%
Underwriting	244	7.6%	258	7.1%

*A complaint may have more than one reason.

The division tracks the amount of money recovered for consumers resulting from a complaint filed with OCI. In 2024, the office assisted complainants in recovering \$7,715,032 from insurers as follows:

Table IV - Amounts Recovered for Complainants by Types of Coverage and Complaint Reason

Coverage Type	Claim Handling	Policyholder Service	Marketing and Sales	Underwriting	Total
Group Health	\$ 2,020,614	\$ 12,088	\$ 1,593	\$ 0	\$ 2,034,295
Ind. Accident and Health	669,205	19,417	7,334	1,169	697,125
Automobile	1,255,779	11,799	1,428	851	1,269,856
Life, Including Credit and Annuities	689,893	246,965	921,966	4,362	1,636,852
Homeowners, Tenants, Farmowners	1,076,735	21,458	230	2,583	202,762
Fire, Allied Lines, Other Property	194,390	501	7,871	0	202,762
General Liability/Liability	541,813	0	0	0	541,813
All Other Lines	<u>227,456</u>	<u>3,867</u>	<u>1,746</u>	<u>0</u>	<u>231,323</u>
Total	<u>\$6,449,551</u>	<u>\$316,095</u>	<u>\$648,573</u>	\$8,964	<u>\$7,715,032</u>

Complainants may request an additional complaint review following the outcome of the initial complaint investigation if the complaint was not resolved to the complainant's satisfaction and the complainant has new information that should be considered. The additional complaint review process allows a complainant to have their complaint reviewed by an advanced-level examiner or a supervisor.

Table V reflects the number of requests for additional complaint reviews. Due to the low number of such requests, trend analysis is difficult. However, the goal of this review process is to ensure that OCI has reviewed all relevant information and that complainants are provided with a complete and detailed explanation of the outcome of their complaint.

Table V - 2024 Complaint Additional Reviews by Line of Business

	Accident & Health	Property & Casualty	Life & Annuities	Total
Number of Additional Reviews in 2024	15	41	1	57

Independent Review Process

Under Wisconsin law, individuals have a right to an independent review of their health insurer's adverse determination or experimental treatment determination. These reviews are carried out by Independent Review Organizations (IROs) registered with OCI. Wisconsin's independent review program began in 2002. Federal law also has an independent review process.

The table below summarizes the total number of IRO determinations under both the state and federal process, the

percentage of insurers' decisions that were upheld, and the percentage reversed in whole or in part by the IROs as reported by health insurers.

	Total	Upheld	Reversed
2022	233	75.9%	24.1%
2023	346	78.3%	21.7%
2024	272	77.2%	22.8%

IRO's Determination

	Reversed	Reversed in Part	Upheld	Annual Total
Adverse Determination	59	1	161	221
Experimental	2	0	48	50
Rescission	0	0	1	1
Pre-existing	0	0	0	0
Total	61	1	210	272

- Adverse Determination – The health insurance carrier determines treatment is not medically necessary or appropriate and denies, reduces, or terminates a benefit.
- Experimental – The treatment was determined to be experimental and thus the benefit was denied.
- Rescission – The health insurance carrier rescinds the policy – meaning the policy is cancelled back to the date it was first effective.
- Pre-Existing – A claim is denied on the basis that the condition being treated was present before the policy began.

Agent Licensing Section

The Agent Licensing section provides oversight of the professional licensing testing services and administration of prelicensing and continuing education programs which are handled by a third-party vendor. Specifically, this section is responsible for the following:

- Reviewing initial license and registration applications, issuing and denying insurance licenses and registrations to individuals and business entities
- Reviewing renewal of license and registration applications.
- Annual company agent appointment billings
- Approves and denies 1033 waivers to individuals
- Issuing forfeiture orders and warning letters for nondisclosures, failing to timely report, and misstatements on applications
- Bond cancellations/riders for public adjusters, pharmacy benefit managers, and employee benefit plan administrators
- Manages disclosures to the state from both licensees, other state regulators, and CMS
- Licensing Updates (name, address, email, phone, drlp changes, etc.)
- Manages changes in residency status

- Approves and denies preclicensing waivers and continuing education exemptions
- Serve as witnesses in legal proceedings
- Handling secondary review of provider/course denials

Agent Licensing - Licensee Counts as of December 31, 2024

Licensee Type	Quantity
Employee Benefit Plan Administrator	390
Intermediary Agent Individual	222,197
Resident	33,067
Nonresident	189,130
Intermediary Firm	10,516
Life Settlement Broker	31
Life Settlement Firm	16
Managing General Agent Firm	69
Managing General Agent Individual	130
Navigator Business Entity	10
Navigator Individual	42
Public Adjuster	248
Pharmacy Benefit Manager	28
Reinsurance Intermediary Broker	53
Rate Service Organization	23
Reinsurance Intermediary Firm	28
Reinsurance Intermediary Manager	7
Risk Purchasing Group	254
Surplus Lines	2,657
Temporary Insurance Intermediary	0
Travel Insurance Firm	44

Licensing Exams

In 2024, 12,351 individuals took a Wisconsin insurance licensing exam. Of those, 6,292 took the remotely proctored exam and 6,059 took the exam in person at a physical test site. The overall first-time pass rate for a remote proctored exam was 58.49% and 57.70% for an exam taken in person.

Providers and Education Courses

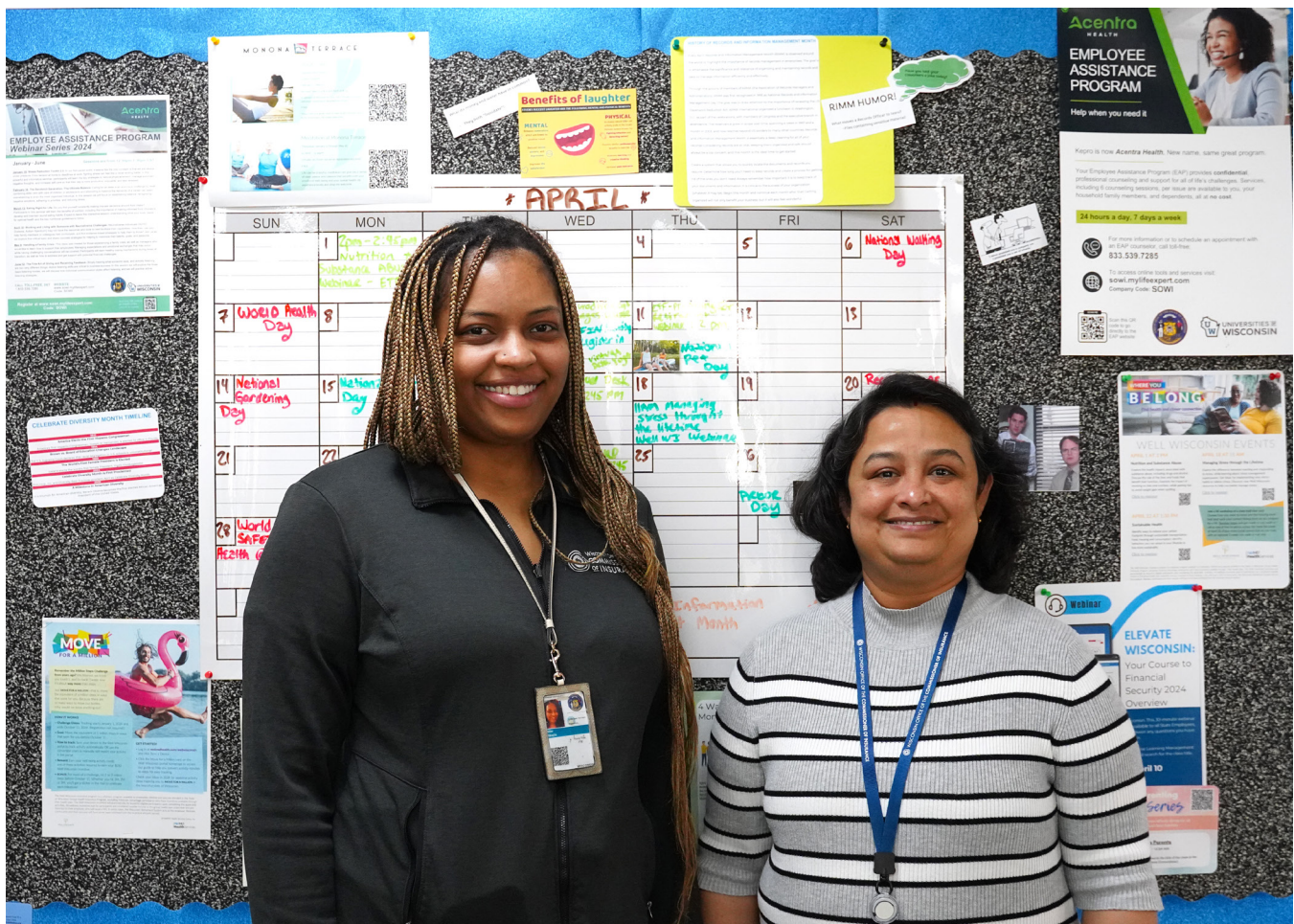
- One new preclicensing education provider application was approved in 2024.
- Two new preclicensing education course applications were approved in 2024.
- 19 new continuing education provider applications were approved in 2024.
- 142 new continuing education course applications were approved in 2024.

Company Agent Appointment Billing

Agent licensing collected \$26,647,996.00 from 1125 insurers for our 2024 annual company appointment billing cycle. A total of 24 companies failed to pay the invoice due.

Other Agent Licensing 2024 Achievements

- Manually reviewed and processed 11,829 licensing applications that were deferred to the state for additional review, a 10.6% increase from the previous year.
- The agent licensing section offered chat functionality full time via our website for individuals and agents to have an additional method to reach out to our office. Agent licensing staff received and assisted with over 1,700 chats.
- The agency transitioned the processing of rate service organizations (RSO) licensing and risk purchasing groups registrations to the agent licensing section in July of 2024. The section was able to improve efficiency and modernize the license and registration processes for these entities
- In August of 2024, agent licensing implemented an electronic method through the National Insurance Producer Registry (NIPR) for Designated Licensed Responsible Producer (DRLP) change requests for entities



and name change requests for licensees.

- Continued to take administrative actions against agents as warranted after investigation. A complete list of administrative actions can be found at oci.wi.gov/AdminActions.
- Jointly with our vendor, PSI Services LLC, the agent licensing section held an annual exam review workshop where subject matter experts participated in the development and administration of the Wisconsin insurance examinations. Additionally, the section held the annual Industry Day Presentation with education providers to discuss updates and areas of concern.
- Participated in the NAIC's Producer Licensing Task Force, Adjuster Licensing Working Group, Producer Licensing Uniformity (D) Working Group, Public Adjuster Licensing Working Group, and Uniform Education Working Group to assist in improving the effectiveness, efficiency, and uniformity of state licensing processes.

Rates and Forms Section

Wisconsin's insurance laws support a functional competition approach to insurance regulation for the health insurance market. Functional competition is defined as competition wherein all participants, including consumers, have access to the market on a level playing field. Functional competition in the marketplace supports the pricing of health insurance products at premium rates that reasonably reflect the medical costs, demographics, and utilization patterns of health care delivery in Wisconsin and is critical to a well-functioning market.

The Rates and Forms section is responsible for establishing and enforcing rate filing requirements, reviewing comprehensive individual and small group rate filings, and monitoring trends in the Wisconsin comprehensive health insurance marketplace.

Wisconsin law requires that health insurance rates used to develop premiums for individual policies and fully insured group policies issued to employers with two to 50 employees (small group policies) be filed with OCI. Filings are required to be submitted in a standardized format. Filings are reviewed for compliance with all applicable laws and regulations, as well as to determine whether there is any indication that the premium rates filed are unreasonable. Wisconsin insurance laws provide that rates are not unreasonable if a sufficient level of functional competition exists in the market.

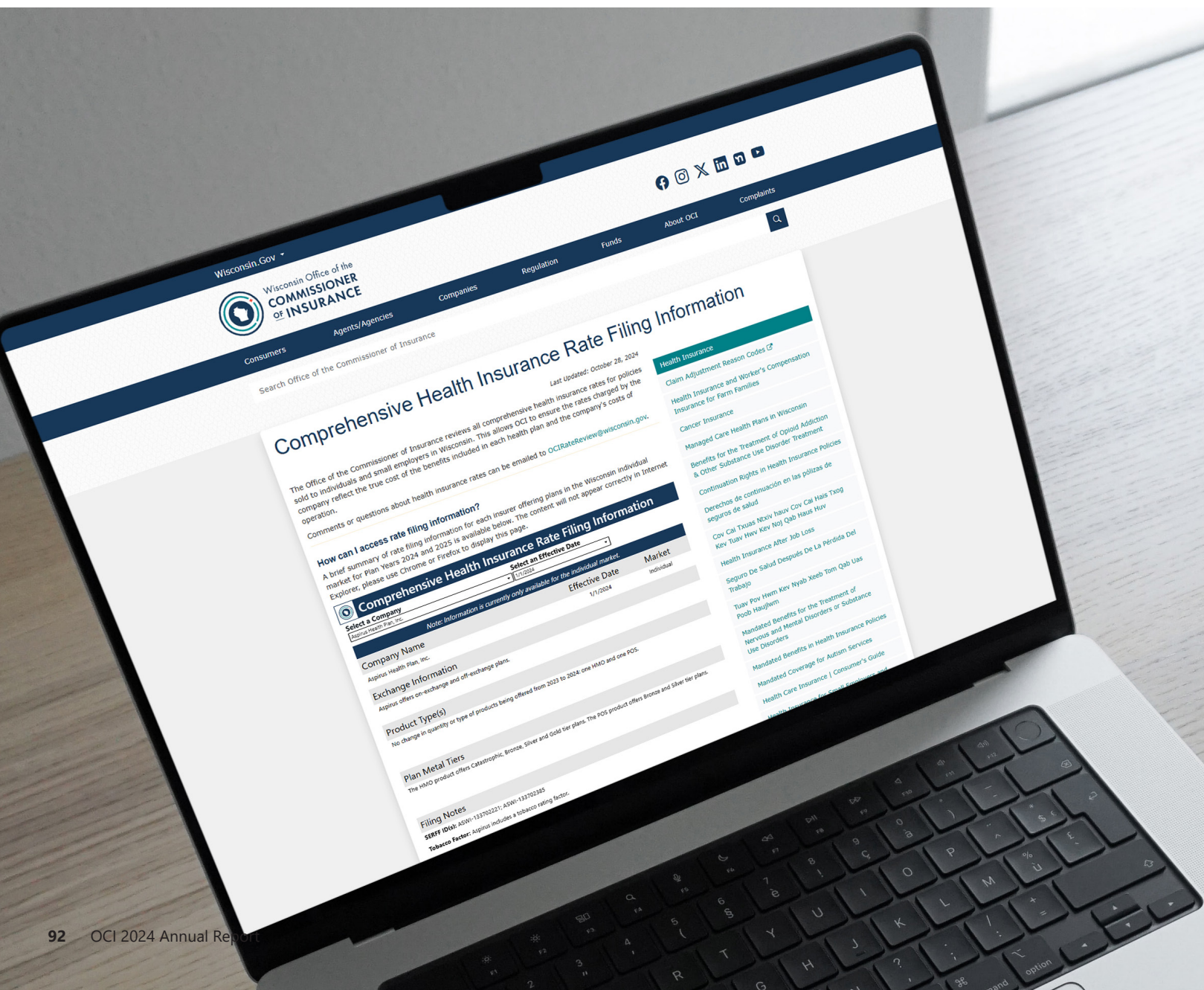
Current health premium rate filings made with OCI can be found on our website.

Rates and Forms Additional Activities

Data from individual and small group health rate filings is collected and aggregated, when possible, to produce enrollment totals and insurer maps that inform and assist consumers and insurers of choices and enrollment activity.

Mozart Project: The use of Mozart wound down in 2024 due to the SERFF modernization efforts.

SERFF Modernization: As the NAIC has been modernizing the SERFF application, WI as well as other states have been providing input and following the progress of this project closely. Once available filing reviews and search capabilities will be greatly enhanced.





Wisconsin Office of the
COMMISSIONER
OF INSURANCE

Wisconsin Office of the Commissioner of Insurance

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