



Wisconsin Office of the  
**COMMISSIONER**  
**OF INSURANCE**

# 2025

## Wisconsin Insurance Report

**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 |

| Name                | Residence   | Term Start         | Term End          |
|---------------------|-------------|--------------------|-------------------|
| Robert D. Haase     | Marinette   | September 15, 1965 | September 7, 1969 |
| 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 elective in 1881. In 1911 the Commissioner of Insurance was made appointive instead of elective.



# Letter to the Governor

Dear Governor Evers:

As Wisconsin's commissioner of insurance, I am pleased to submit the 2025 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 2025, OCI carried out our mission to protect and educate Wisconsin consumers while maintaining a strong insurance industry.

We furthered our mission by advocating for greater access to health care coverage, communicating 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 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nathan Houdek', written in a cursive style.

Nathan Houdek  
Commissioner of Insurance







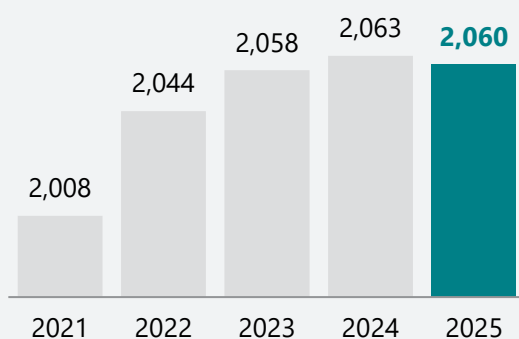


## About OCI

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.

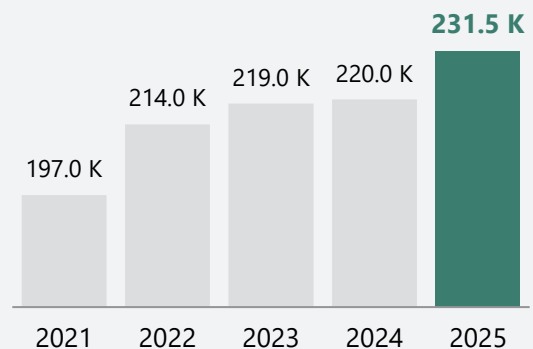
## Insurance in Wisconsin

### Insurers



In 2025, there were **2,060 insurers** authorized to write business in Wisconsin.

### Agents



Wisconsin's insurance industry is key to our strong economy. There are more than **231,500 agents** licensed to do business in Wisconsin, and over 33,000 are Wisconsin residents.

# Protecting Wisconsinites

OCI makes sure that insurance companies follow Wisconsin’s laws and regulations, policyholders get the coverage they have paid for, and consumers are protected.

over 20k inquiries handled

In 2025, OCI investigated and closed over 4,000 written consumer complaints and handled 20,000 general inquiries received via email and telephone.

\$277,167 in forfeitures remitted

OCI remitted \$277,167.77 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 2025. over

\$6.7 million recovered

OCI assisted complainants in recovering just over \$6.7 million for consumers.



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p: 608-266-0103 | p: 1-800-236-8517 | f: 608-264-8115  
[OCI@OCISecretary@wisconsin.gov](mailto:OCI@OCISecretary@wisconsin.gov) | [oci.wi.gov](http://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 \_\_\_\_\_







## Staff Committees

With around 140 employees in 2025, 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.

### 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.

### Equity, Diversity, and Inclusion Advisory (EDI) Committee

In compliance with [state law](#), OCI has an affirmative action advisory committee which was renamed the EDI Committee in 2021. This committee is responsible for supporting and monitoring the implementation of the goals and strategies listed in OCI's Equity and Inclusion Plan. Our [Equity and Inclusion Plan](#) was developed in 2023 and is in effect from January 1, 2024, to December 31, 2026. This plan was renamed to the Recruitment and Retention Action Plan as of July 1, 2026. The EDI Committee works on ensuring equal opportunity for all employees. The committee also works to develop and sponsor training, events, and activities that encourage personal growth and support an inclusive culture that ensures all employees can succeed.





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# 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 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 agent licensing and continuing education program. DMR also processes, reviews, and, when applicable, approves all rate and form filings, and processes Vehicle

Protect Plans and Warranties. OCI's managed care specialist assigned to this division investigates complex managed care complaints that OCI receives, educates consumers on their rights under managed care plans, and administers the state's independent review program.

The Division of Market Regulation and Enforcement is also responsible for establishing and enforcing rate filing requirements, 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 the 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 Files 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 Information Technology services and support.

### Legal Unit

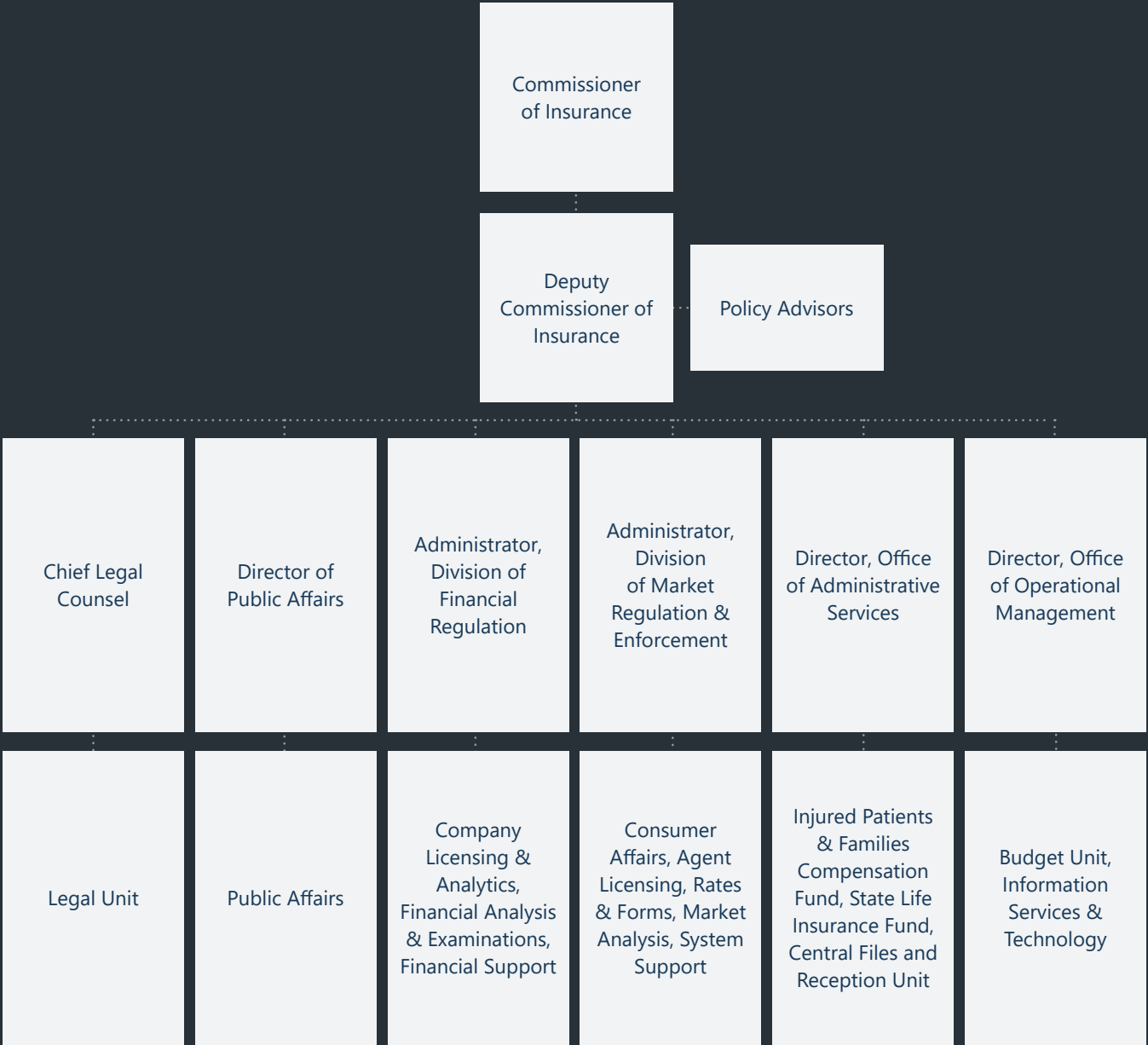
The Legal Unit represents the agency in administrative procedures, provides legal advice to staff, represents or supervises representation of the agency in litigation and insurance company receiverships, and develops legislative proposals and administrative rules. It provides legal services for the Injured 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.

Organizational Chart





## Senior Management



### 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). 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 and is a Certified Public Accountant.

### Lauren U. Van Buren

Lauren U. Van Buren was appointed Chief Legal Counsel in January 2023. Lauren previously 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 NAIC, representing Wisconsin on a number of key working groups and committees.

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 NAIC. Amy serves as a member of several NAIC committees.

In December 2025, Amy earned the prestigious Robert Dineen Award. This award is given out by the National Association of Insurance Commissioner President to honor a regulator who has made an outstanding contribution to state regulation of insurance and fosters the advancement of the insurance regulatory

profession.

## **Rebecca Rebholz**

In 2025, Rebecca Rebholz was the Administrator for the Division of Market Regulation and Enforcement at OCI. Before that 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 at 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 has served as the Director of Public Affairs at OCI since 2020. 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 2025 (Amounts in \$000s)

|                                                   | Total Revenue           | Retained by Office of the Commissioner of Insurance | Transferred to State's General Purpose & Other Revenue Funds <sup>1</sup> |
|---------------------------------------------------|-------------------------|-----------------------------------------------------|---------------------------------------------------------------------------|
| Premium Taxes                                     | \$268,785               |                                                     | \$268,785                                                                 |
| Fire Department Dues                              | 37,964                  |                                                     | 37,964                                                                    |
| Forfeitures                                       | 277                     |                                                     | 277                                                                       |
| Insurance Company Examination Charges             | 10,260                  | 10,260                                              | -                                                                         |
| Resident/Nonresident Appt Billings and Renewals   | 35,984                  | 35,984                                              | -                                                                         |
| Agent Continuing Education Fees                   | 0                       | 0                                                   | -                                                                         |
| Resident/Nonresident Producer License Issuance    | 1,266                   | 1,266                                               | -                                                                         |
| Resident/Nonresident Biennial License Renewals    | 9,370                   | 9,370                                               | -                                                                         |
| Reinstatements                                    | 1                       | 1                                                   | -                                                                         |
| Other Licensing Fees                              | 122                     | 122                                                 | -                                                                         |
| Company Licenses, Admissions, and Renewals        | 144                     | 144                                                 | -                                                                         |
| Miscellaneous <sup>2</sup>                        | <u>0</u>                | <u>0</u>                                            | <u>-</u>                                                                  |
| <b>Total Revenue</b>                              | <b><u>\$364,172</u></b> | 57,146                                              | <b><u>\$307,026</u></b>                                                   |
| Less Total Operating Expenditures                 |                         | <u>22,413</u>                                       |                                                                           |
| Net Operating Revenue / (Loss)                    |                         | 34,733                                              |                                                                           |
| Cash Lapse to State's General Fund (Transfer Out) |                         | <u>(34,575)</u>                                     |                                                                           |
| <b>Net Change in Fund Equity</b>                  |                         | <b><u>\$ (158)</u></b>                              |                                                                           |

<sup>1</sup>The Office of the Commissioner of Insurance retains all revenue from licenses, services, and 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.

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



## Segregated Funds

Fiscal Year 2025 (Amounts in \$000s)

| Fund                                        | Total Revenue | Operating Expenses | Net Revenue             |
|---------------------------------------------|---------------|--------------------|-------------------------|
| Injured Patients & Family Compensation Fund | \$129,441     | \$147,340          | \$(17,899) <sup>3</sup> |
| State Life Insurance Fund                   | 3,762         | 7,585              | (3,822) <sup>4</sup>    |

<sup>3</sup>The Fund experienced increases in Reported Losses and Reported Loss Liabilities leading to increased operating expenses. The Fund also noted improved investment income from the prior year.

<sup>4</sup>The State Life Insurance Fund continues to pay dividends to policyholders to maintain the required statutory surplus.





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# Executive Initiatives

## Regulatory Developments and Trends

### Industry Changes

In 2025, 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. The health insurance market was also disrupted by changes at the federal level, primarily impacting the HealthCare.gov marketplace in 2025.

### Federal Policy Changes to Health Insurance

H.R.1 and provisions in the [2025 Marketplace Integrity and Affordability Final Rule](#) rolled back a number of policies and created new processes impacting the regulation of the individual health insurance market. Some of those changes included:

- Making people with Deferred Action for Childhood Arrival (DACA) immigration status ineligible for marketplace coverage. Coverage was terminated on September 30, 2025, including for those with existing coverage.
- Eliminating the year-round special enrollment period (SEP) for people with incomes at or below 150% FPL
- Ending an automatic 60-day extension to the 90-day period to resolve income inconsistencies.
- Setting a “preponderance of evidence” standard and requiring HealthCare.gov to apply it when assessing agent, broker, or web-broker terminations.

On August 22, 2025, a federal judge granted a request for an injunction that temporarily stopped seven of the provisions in the 2025 Marketplace Program Integrity and Affordability Final Rule from taking effect for the 2026 Open Enrollment Period. These policies did not go into effect beginning August 25, 2025, as originally expected. These provisions were not ultimately implemented but will likely be reintroduced in 2026:

- Requiring income verification documents for those below 100% of the federal poverty level (FPL) or when no tax data is available.
- Allowing health insurers to require that people pay past-due premiums before the consumer can enroll in new coverage with that insurer.
- Charging a \$5 monthly fee to people enrolled in plans with \$0 premiums who do not actively reenroll in coverage (would have taken effect for Open Enrollment for Plan Year 2026).
- Determining people ineligible for Premium Tax Credits (PTCs) if the tax filer failed to reconcile their PTCs on their tax returns for one year, rather than two years (would have taken effect for Plan Year 2026).
- Changing actuarial value de minimis ranges, enabling insurers to offer plans with actuarial values below the standard value (would have taken effect for Plan Year 2026).
- Requiring additional verification for commonly used Special Enrollment Periods (would have taken effect for Plan Year 2026).

The stayed proposal to change the actuarial value de minimis range extended the uncertainty impacting the 2026 Open Enrollment Period into the Fall. As late as October 2025, insurers were forced to make changes to their filings with Centers for Medicare and Medicaid Services (CMS) and OCI to comply with the changing expectations and requirements.

CMS also announced changes in September 2025 to eligibility for Catastrophic plans, which required some insurers to make further adjustments to their plan offerings. With these changes in place, consumers newly ineligible for advanced premium tax credits (APTC) or cost-sharing reductions due to their projected annual income (below 100% or above 400% of the federal poverty level) became eligible for a hardship exemption and can enroll in catastrophic coverage.

Additionally, the enhanced ATPCs (eAPTC) expired at the end of 2025, significantly increasing costs for Wisconsinites enrolling in individual health insurance coverage on HealthCare.gov. Thanks to the enhanced premium subsidies, an individual making \$45,000 could pay no more than around 5.5% of their annual income towards a benchmark plan premium, a cost of \$2,475 annually on average. After the eAPTC expiration, this same individual had to pay 9.6% of their income toward a benchmark plan, an annual average cost of \$4,311.

Insurers also adjusted their service areas to account for the federal changes, which were projected to cause an unhealthier risk mix and lower overall enrollment.

Enrollment was expected to decline across all income categories without enhanced premium subsidies in place, with the youngest and healthiest enrollees most likely to choose to go without health insurance coverage. For the first year since the 2021 Open Enrollment period, one county in Wisconsin only had one insurer to choose from. Eleven counties were down to two insurers.

Finally, in early 2025, CMS rescinded the terminations of hundreds of agents in Wisconsin who had previously been removed from accessing consumers on the Marketplace due to inappropriate actions like unauthorized enrollment or plan changes that harmed consumers. As the Marketplace Integrity Rule created a greater administrative burden to removing agents going forward, these agents have been able to continue to have access to consumers on the HealthCare.gov Marketplace.





## 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 2025, 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, or the commissioner's representative. 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.

### **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, is a member of this board and serves 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.

## **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 overall

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 of insurance or the commissioner's 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 Commissioner Activities

OCI actively participates in the National Association of Insurance Commissioners (NAIC). Throughout 2025, 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)  
 International Insurance Relations (G) Committee

### EX Committee Groups and Task Forces

Climate and Resiliency (EX) Task Force

### Task Forces

Regulatory Framework (B) Task Force  
 Senior Issues (B) Task Force  
 Antifraud (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 Risk-Based Capital Model Governance (EX) Task Force (Co-Chair)  
 Valuation of Securities (E) Task Force

### Liaison Committees and Boards

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





## 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 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 the Fund's workflow, improve efficiency, and enhance customer service by automating various processes and providing centralized access to policy and claims information.

# 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 2025, the same amount as in 2024.

## February 27, 2025

### [Change in Submission of Annual/Quarterly Premium Taxes, Annual Fees, Fire Department Dues Payments, and Annual Premium Tax Filings](#)

OCI issued this bulletin stating that the agency has implemented OPTins, a product of the National Association of Insurance Commissioners (NAIC), for insurers filing and paying Wisconsin premium taxes, fire department dues, and fees.

Companies paying taxes and fees required under Wis. Stats. § 76.60, 76.63, 76.65, 76.66, 76.67, 601.31, 601.55, and 601.93 must use OPTins to pay premium taxes beginning with the first 2025 quarterly estimated tax payment due April 15, 2025.

## March 14, 2025

### [The Use of the “NPN Override” Function](#)

OCI issued this bulletin after receiving numerous consumer complaints directed at insurance intermediaries, alleging fraudulent enrollment in Affordable Care Act plans offered through the federally facilitated marketplace (the Marketplace). OCI determined that, in many cases, the intermediary used the “National Producer Number (NPN) override” function on an Enhanced Direct Enrollment (EDE) platform to submit the application.

OCI’s position is that this practice violates Wisconsin law. An intermediary who designates themselves as the agent of record, without having completed the enrollment, violates Wis. Stat. § 628.034(1)(a), prohibiting misrepresentations relating to insurance contracts.

## March 18, 2025

### [The Use of Artificial Intelligence Systems in Insurance](#)

The Wisconsin Office of the Commissioner of

Insurance (OCI) issued this bulletin to remind all entities regulated by OCI that decisions or actions impacting consumers that are made or supported by advanced analytical and computational technologies, including Artificial Intelligence (AI) Systems must comply with all applicable insurance laws and regulations.

## September 16, 2025

### [COVID-19 Immunization Coverage](#)

As directed by Governor Tony Evers in Executive Order #275, the Office of the Commissioner of Insurance issued this bulletin to provide guidance to health insurers and governmental self-funded health plans regarding coverage requirements for the COVID-19 vaccine.

Chief Medical Officer and State Epidemiologist for Communicable Diseases Dr. Ryan Westergaard issued a standing medical order that served as a prescription for eligible Wisconsin residents to receive the COVID-19 vaccine. The Department of Health Services, based on evidence-based recommendations for vaccine administration, recently indicated that eligible Wisconsin Medicaid recipients can continue to receive COVID-19 vaccines without cost-sharing.

## October 7, 2025

### [Claim Processing Timelines](#)

The Office of the Commissioner of Insurance issued this bulletin to remind insurers of the 30-day time limit to process claims. Insurers’ timeliness in processing claims is pivotal for consumers to meet the deadlines required to apply for FEMA funding.

## November 7, 2025

### [Wisconsin Agent Appointment Renewal Invoices due 2026](#)

The Wisconsin Office of the Commissioner of Insurance (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 15, 2025.





## Legislation

In 2025, Governor Evers signed legislation affecting the business of insurance in Wisconsin. Legislative materials may be found online at [legis.wisconsin.gov](https://legis.wisconsin.gov) and may also be obtained from the Wisconsin Legislative Council at [lc.legis.wisconsin.gov](https://lc.legis.wisconsin.gov) or by calling (608) 266-1307.

### 2025 Wisconsin Act 17

#### Advanced Practice Registered Nurses

To repeal 50.01 (1b), 77.54 (14) (f) 3., 118.2925 (1) (b), 118.294 (1) (a), 146.89 (1) (r) 8., 252.01 (1c), 440.03 (13) (b) 3., 440.03 (13) (b) 42., 440.08 (2) (a) 4m., 440.08 (2) (a) 50., 441.11 (title), 441.11 (1), 441.11 (3), 441.15, 441.16, 441.19, 448.035 (1) (a), 450.01 (1m) and 655.001 (9); to renumber 655.001 (1); to renumber and amend 146.89 (1) (r) 3., 253.13 (1), 255.06 (1) (d), 441.06 (7) and 441.11 (2); to amend 29.193 (1m) (a) 2. (intro.), 29.193 (2) (b) 2., 29.193 (2) (c) 3., 29.193 (2) (cd) 2. b., 29.193 (2) (cd) 2. c., 29.193 (2) (e), 29.193 (3) (a), 45.40 (1g) (a), 46.03 (44), 50.08 (2), 50.09 (1) (a) (intro.), 50.09 (1) (f) 1., 50.09 (1) (h), 50.09 (1) (k), 50.49 (1) (b) (intro.), 51.41 (1d) (b) 4., 70.47 (8) (intro.), 77.54 (14) (f) 4., 97.59, 106.30 (1), 118.15 (3) (a), 118.25 (1) (a), 118.29 (1) (e), 118.2915 (2) (a), 118.2915 (3) (a), 118.2915 (4) (c), 118.2915 (6) (a) (intro.), 118.2915 (6) (a) 2., 118.2915 (6) (a) 3., 118.2925 (3), 118.2925 (4) (c), 118.2925 (5), 118.294 (1) (am), 118.294 (2), 118.294 (4) (a), 146.615 (1) (a), 146.82 (3) (a), 146.89 (1) (r) 1., 146.89 (6), 154.01 (1g), 252.07 (8)

(a) 2., 252.07 (9) (c), 252.10 (7), 252.11 (2), 252.11 (4), 252.11 (5), 252.11 (7), 252.11 (10), 252.15 (3m) (d) 11. b. and 13., (5g) (c), (5m) (d) 2. and (e) 2. and 3. and (7m) (intro.) and (b), 252.16 (3) (c) (intro.), 252.17 (3) (c) (intro.), 253.07 (4) (d), 253.115 (4), 253.115 (7) (a) (intro.), 253.15 (2), 255.06 (2) (d), 255.07 (1) (d), 257.01 (5) (a), 257.01 (5) (b), 341.14 (1a), 341.14 (1e) (a), 341.14 (1m), 341.14 (1q), 343.16 (5) (a), 343.51 (1), 343.62 (4) (a) 4., 440.077 (1) (a), 440.077 (2) (c), 440.094 (1) (c) 1., 440.094 (2) (a) (intro.), 440.981 (1), 440.982 (1), 440.987 (2), 441.01 (3), 441.01 (4), 441.01 (7) (a) (intro.), 441.01 (7) (b), 441.06 (3), 441.06 (4), 441.07 (1g) (intro.), (a), (c) and (e), 441.07 (2), 441.10 (7), 441.18 (2) (a) (intro.), 441.18 (2) (b), 441.18 (3), 448.03 (2) (a), 448.035 (2) to (4), 448.56 (1) and (1m) (b), 448.62 (2m), 448.67 (2), 448.956 (1m), 450.01 (16) (h) 2., 450.01 (16) (hr) 2., 450.03 (1) (e), 450.11 (1g) (b), 450.11 (1i) (a) 1., 450.11 (1i) (b) 2. b., 450.11 (7) (b), 450.11 (8) (e), 450.13 (5) (b), 450.135 (7) (b), 462.04, 655.001 (7t), 655.002 (1) (a), 655.002 (1) (b), 655.002 (1) (c), 655.002 (1) (d), 655.002 (1) (e), 655.002 (1) (em), 655.002 (2) (a), 655.002 (2) (b), 655.003 (1), 655.003 (3), 655.005 (2) (a), 655.005 (2) (b), 655.23 (5m), 655.27 (3) (a) 4., 655.27 (3) (b) 2m., 655.275 (2), 655.275 (5) (b) 2., 895.478 (3m), 961.01 (19) (a) and 961.395; to repeal and recreate 118.2915 (1) (a), 155.01 (1g) (b), 251.01 (1c) and 441.06 (title); to create 253.115 (1) (f), 253.13 (1) (a), 253.15 (1) (em), 255.06 (1) (f) 2., 440.03 (13) (b) 39m., 440.08 (2) (a) 47r., 441.001 (1c), 441.001 (3c), 441.001 (3g), 441.001 (3n), 441.001 (3r), 441.001 (3w), 441.001 (5), 441.01 (7) (c), 441.065, 441.07



(1r), 441.09, 441.092 and 655.001 (1g) of the statutes;

2025 Wisconsin Act 17 created a new system of licensure that allows a registered nurse (RN) to be licensed by the Board of Nursing as an advanced practice registered nurse (APRN). Among other things, the act generally authorizes an APRN to issue prescription orders, use the title “APRN,” and delegate certain tasks to other clinically trained health care workers.

An APRN must have malpractice liability insurance coverage in the amounts specified for participation in the Injured Patients and Families Compensation Fund (IPFCF). An APRN who practices independently outside of a collaborative relationship or other employment relationship must participate in the IPFCF.

The IPFCF participation requirement applies only to an APRN who has qualified to practice independently under the second exception to the collaboration requirement. Accordingly, the IPFCF participation requirement does not apply to an APRN with a CNM specialty designation, who may practice independently under the first exception to the collaboration requirement.

The Changes in this Act became effective on September 1, 2026

*Kelley, M. (2025, September 11). Wisconsin Legislative Council Act Memo, 2025 WI Act 17, <https://docs.legis.wisconsin.gov/2025/related/lcactmemo/act017.pdf>*

## **2025 Wisconsin Act 23**

### **Conversion of Cooperative Associations Organized to Establish and Operate Nonprofit Plans or Programs for Health Care into Service Insurance Corporations**

To create 613.76 of the statutes;

2025 Wisconsin Act 23 allowed an organization established as a health care cooperative to convert into a service insurance corporation. To do so, a health care cooperative must first adopt a plan of conversion that states all of the following: the

reasons and purposes of the proposed action; the proposed terms, conditions, and procedures for the conversion; the proposed name of the service insurance corporation; and the proposed articles and bylaws of the service insurance corporation.

The health care cooperative must submit the proposed plan of conversion to the Office of the Commissioner of Insurance (OCI) with any additional required application information. After a hearing, OCI must approve the proposed plan unless OCI finds that the plan is contrary to law, financial standing is inadequate to support the plan, or the plan is contrary to the interests of the health care cooperative members or the public.

The health care cooperative must then obtain its members’ approval of the proposed plan of conversion. If approved, the cooperative must submit evidence of the approval to OCI and file articles of conversion with the Department of Financial Institutions.

If all requirements of the conversion are met, OCI must issue a certificate of authority to the new service insurance corporation. The health care cooperative thereupon ceases its legal existence. However, OCI may grant a period up to one year for adjustment to the insurance regulations that apply to service insurance corporations.

The officers and directors of the health care cooperative are the initial officers and directors of the service insurance corporation and the new corporation has all the assets and liabilities of the former cooperative.

The health care cooperative is prohibited from paying compensation of any kind to existing personnel in connection with a proposed conversion, other than regular salaries. With OCI’s approval, payment may be made at reasonable rates for printing costs and for legal and other professional fees.

The Changes in this Act became effective on August 10, 2025

*Kelley, M. (2025, September 2). Wisconsin Legislative Council Act Memo, 2025 WI Act 23, <https://docs.legis.wisconsin.gov/2025/related/lcactmemo/act023.pdf>*

## Administrative Rules

In 2025, 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 a 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 sets 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 2025, OCI had no rules repealed through an expedited process.

In 2025, OCI had no emergency rules 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 number of administrative actions were taken in 2025.

### Companies

|                         |           |
|-------------------------|-----------|
| Total Number of Actions | 88        |
| Forfeitures Demanded    | \$180,620 |

### Agents

|                         |             |
|-------------------------|-------------|
| Licenses Denied         | 44          |
| Licenses Revoked        | 108         |
| Licenses Surrendered    | 12          |
| Licenses Suspended      | 12          |
| Total Number of Actions | 248         |
| Forfeitures Demanded    | \$82,206.74 |





Each month, OCI publishes the administrative actions it has taken against these entities. 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.

The 2023 state budget granted OCI new authority when an investigation identifies an act of insurance fraud and created an attorney position to investigate and enforce. A paralegal position was created in the 2024 state budget, and the fraud unit was fully operationalized by 2025. Wis. Stat. § 601.41 (12) defines insurance fraud as “knowingly presenting a false or fraudulent claim” or “presenting false information in an application for insurance.”

OCI issues administrative actions against individuals and entities that have violated the insurance fraud statute. In 2025, OCI issued its first forfeiture of \$33,000 related to a case of insurance fraud in which a Milwaukee business owner misrepresented his business to a worker’s compensation insurer and underpaid premiums as a result.

## Fraud

|                         |          |
|-------------------------|----------|
| Total Number of Actions | 38       |
| Forfeitures Demanded    | \$44,600 |

Administrative orders may be viewed online at [ociaccess.oci.wi.gov/OrderInfo](https://ociaccess.oci.wi.gov/OrderInfo). You can search all Administrative Orders for 2025 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 2025 was \$262,823.74.

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





## Public Affairs

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

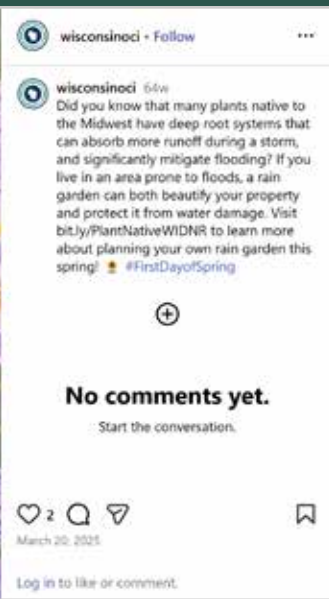
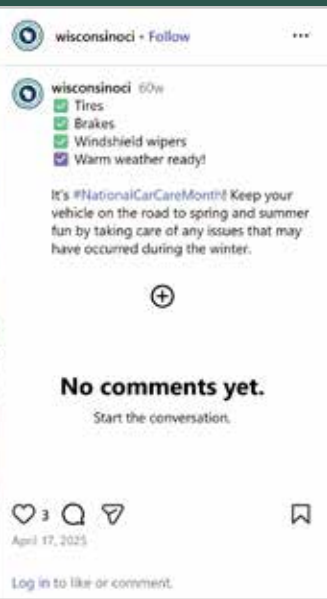
This unit is overseen by the Director of Public Affairs and includes a legislative policy advisor, an advanced communications specialist focusing on graphic design and marketing, a social media and outreach specialist, and a copy editor/content manager.

In 2025, 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 [oci.wi.gov](https://oci.wi.gov) as a resource for consumers and stakeholders. The website houses dozens of consumer publications on topics ranging from renters insurance to disputing health insurance claim denials.

A comprehensive list of OCI consumer publications can still be found at [oci.wi.gov/publications](https://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](https://oci.wi.gov/Pages/Consumers/Order-a-Publication.aspx).





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# Office of Operational Management

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

## Continuity of Operations

This section is responsible for ensuring OCI's ability to carry on agency operations in the event of a disruption. During 2025, the section completed a tabletop exercise with the Office of Administrative Services, IT, and the Department of Administration.

## 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 (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:

- Prepared GAAP information for the general fund and the insurance liquidation account pursuant to DOA guidelines and requirements
- Successful rollout of Printer Badge Access
- Completed the internal PCard compliance audit and made process changes.
- 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/business case documents.

In 2025, the OOM project management team successfully:

- Provided project management support to the migration of OCI's Complaints System to the NAIC's State Based Systems
- Improved the process for the review and routing of the Purchasing Card Statements to be done electronically
- Migrated OCI's Premium Tax application to the NAIC's OPTins system for the Quarterly Estimated Payments



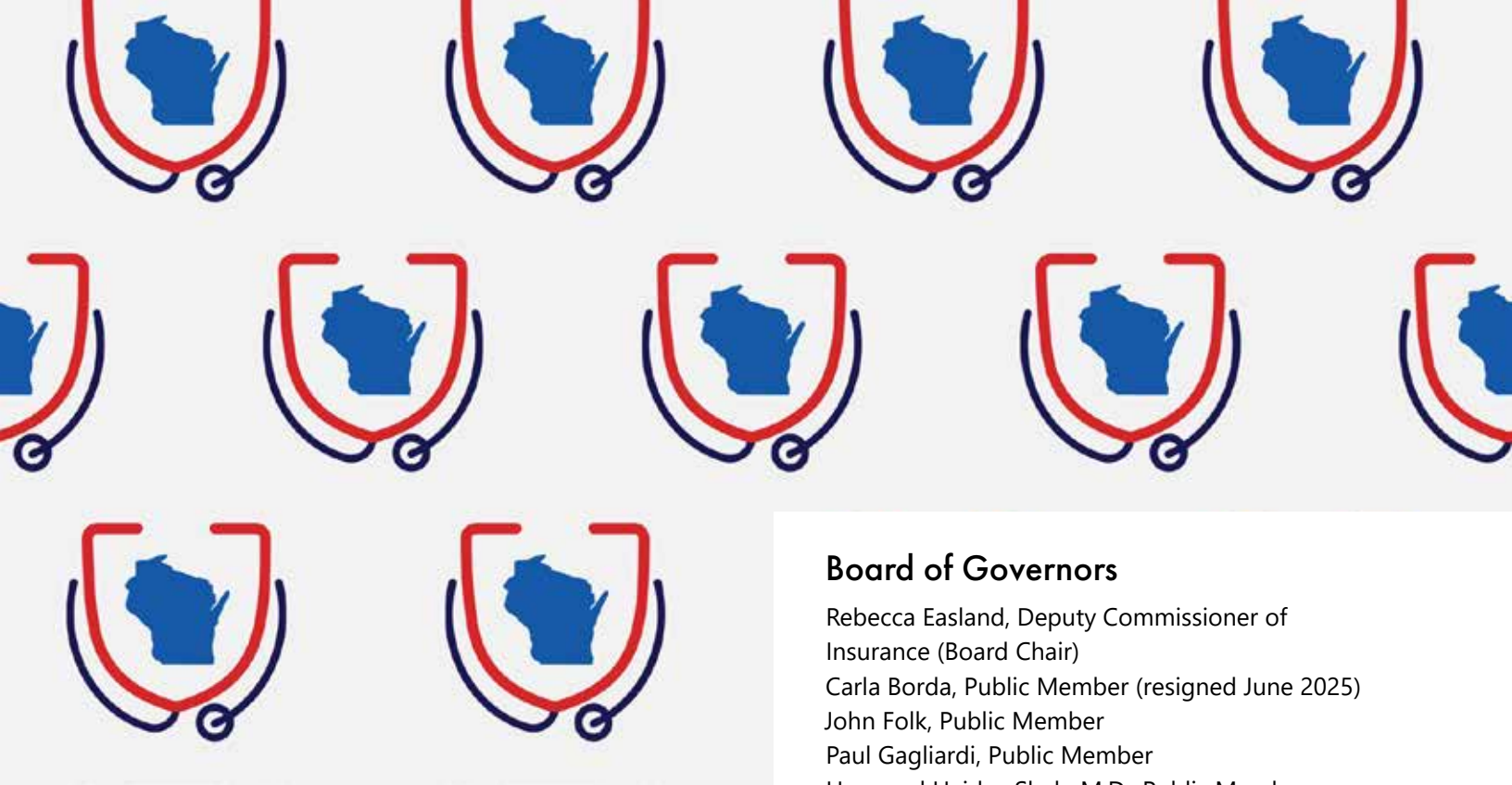
## Office of Administrative Services

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, and 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 2025, 77 exams were proctored, leading to 16 designations. OCI created one new RDA, amended three existing RDAs, closed three, and superseded two. The unit also processed 300 open records requests and mailed 2,719 publications upon request. Thirty-eight boxes were sent to the State Records Center (SRC) for continued retention, and the unit reviewed 8,039 electronic files for accuracy. 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 2025, they destroyed 250 boxes of confidential material in-house and provided other services to the agency.



## Injured Patients and Families Compensation Fund

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 (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.

### Board of Governors

Rebecca Easland, Deputy Commissioner of Insurance (Board Chair)  
Carla Borda, Public Member (resigned June 2025)  
John Folk, Public Member  
Paul Gagliardi, Public Member  
Hammad Haider-Shah, M.D., Public Member  
Susan Forray, Industry Representative  
David Maurer, Industry Representative (resigned December 2025)  
Vacancy, Industry Representative  
Eric Farnsworth, Wisconsin Association for Justice  
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

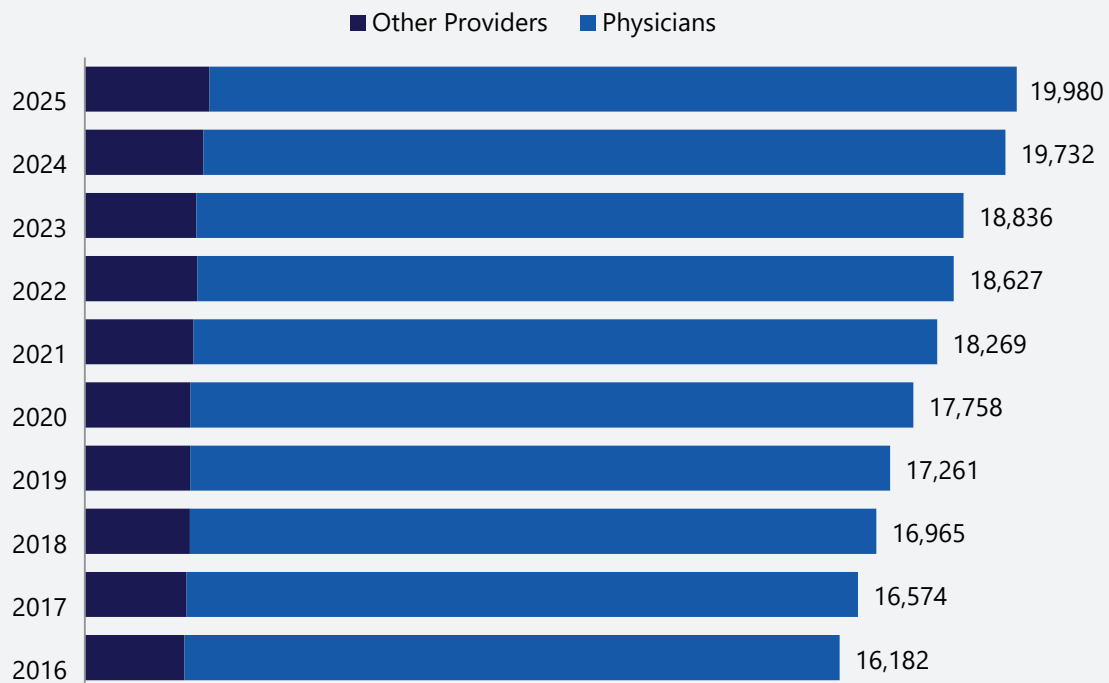
The Fund operates on a fiscal year basis: July 1 through June 30. Administrative costs, operating costs, and claim payments are funded through assessments on participating health care providers.



## Fund Participants

As of December 31, 2025, there were a total of 19,980 Fund participants comprised of 162 hospitals with 10 affiliated nursing homes, 17,310 physicians, 1,210 nurse anesthetists, 20 hospital-owned or controlled entities, 66 ambulatory surgery centers, one cooperative, 11 partnerships, and 1,190 corporations actively participating in the Fund.

As of December 31, 2025, Fund participants consisted of 87% physicians, 6% corporations, and the remaining 7% included all other participants.



## Claims Activity

From July 1, 1975, through June 30, 2025, the Fund was named in 6,702 claims. During this period, the Fund's total number of paid claims was 716, equaling \$1,009,033,197.94. Of the total number of claims in which the Fund has been named, 5,961 claims have been closed with no indemnity payment.

## Board Committees

### Actuarial and Underwriting Committee

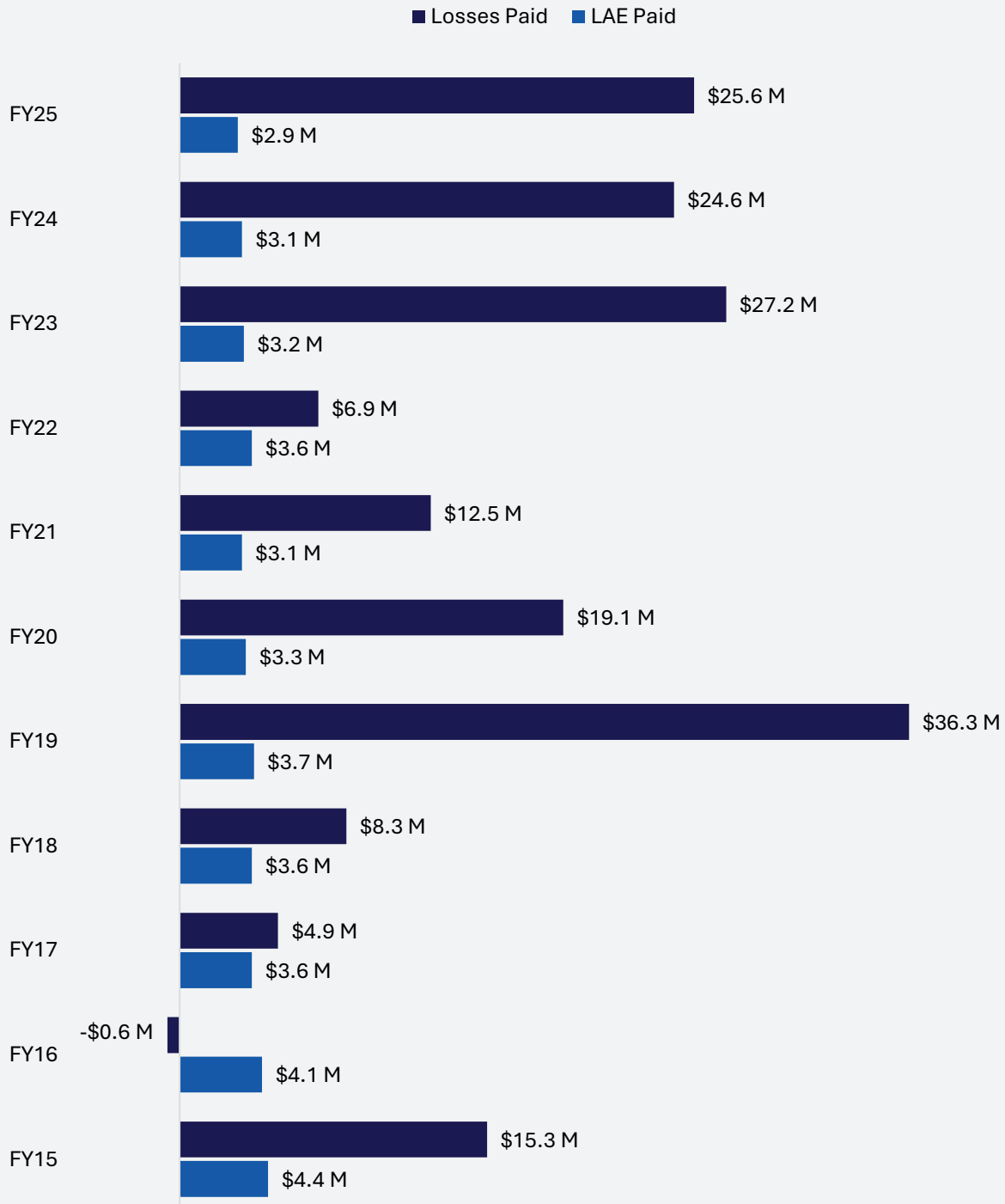
The Actuarial and Underwriting Committee advises the Board on actuarial and underwriting issues.

The committee assisted the Board in establishing fiscal year 2025 fees. The Board approved resuming the annual assessment at the level that was charged in fiscal year 2024. Mediation panel fees for physicians (excluding physicians in a residency program) were set at \$5.25 per physician and \$1.00 per occupied hospital bed.

## Claims Committee

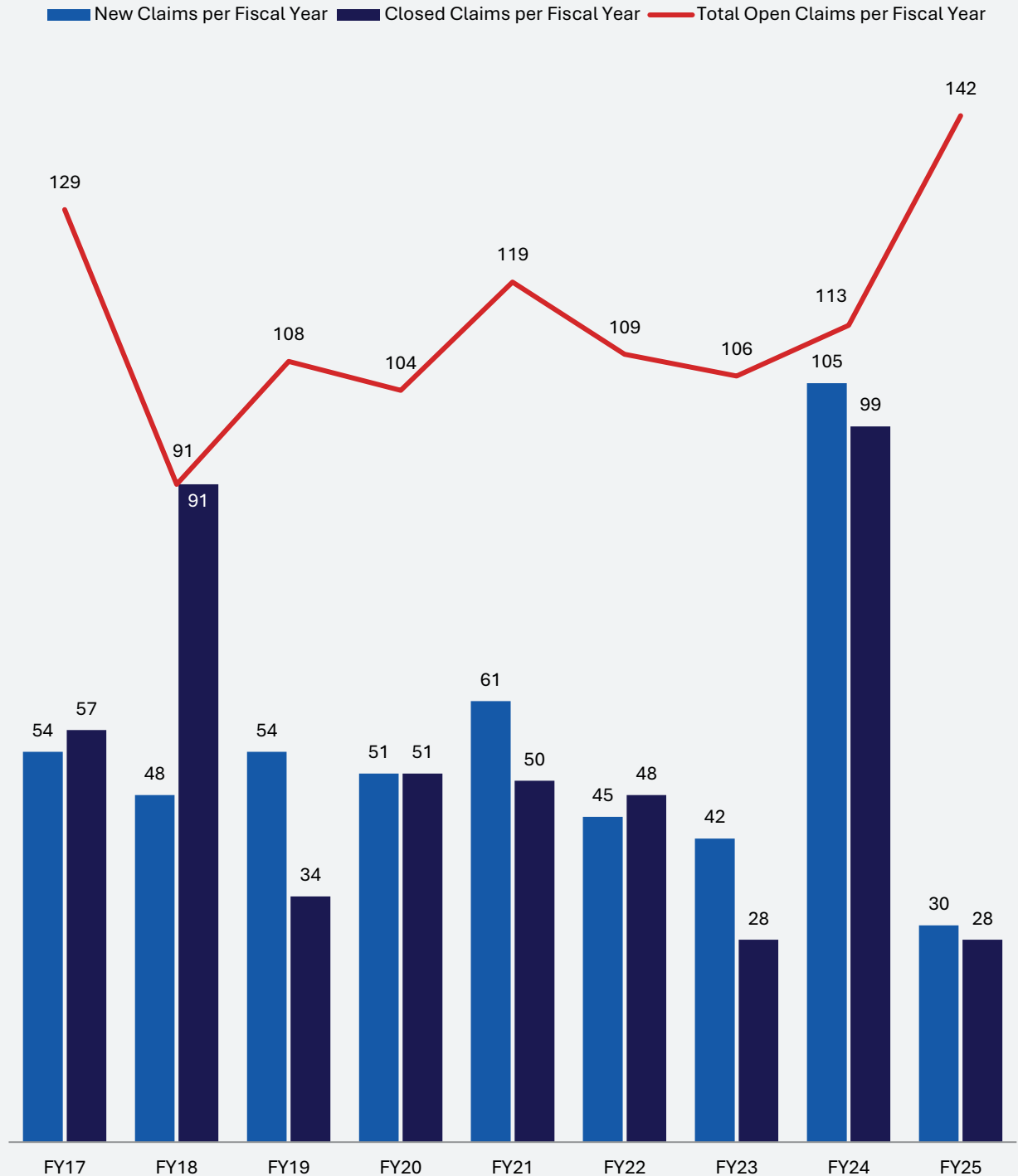
The Claims Committee is responsible for establishing claims policies and procedures for the Fund and the Wisconsin Health Care Liability Insurance Plan (Plan) and approving claims settlements.

### Losses and LAE Payments per Fiscal Year



Please note that some numbers may be negative because calculations are done on a gross basis that take 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 calendar year January 1, 2025, through December 31, 2025, the committee approved 191 requests for retroactive coverage and zero requests for gap coverage replacement. The committee denied no requests for retroactive coverage.

Under guidelines set for expedited approval by the Board and Legal Committee, the Fund manager approved 175 requests for retroactive coverage and the WHCLIP manager approved 29 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, 2024, through June 30, 2025, 33 claims paid reports were filed and 181 reports were reviewed under the 5-year review period. Of the claims paid reports filed during the fiscal year 22 were for physicians or nurse anesthetists, eight for hospitals, nursing homes, corporations, or clinics, and three for other types of providers. The Council determined no providers were subject to a surcharge.

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

### Risk Management and Patient Safety Committee

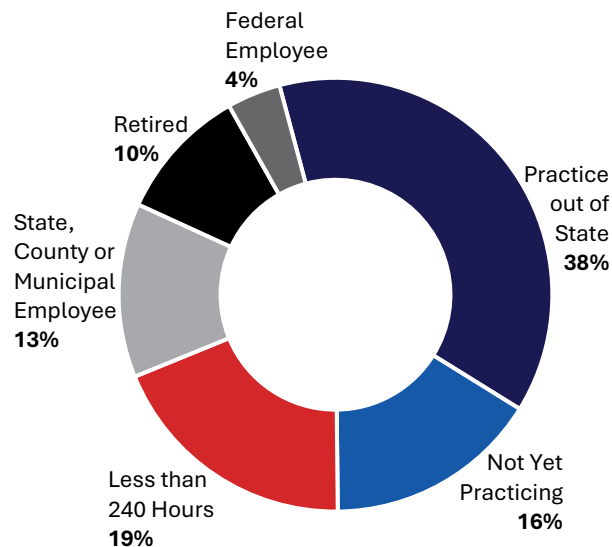
The purpose of the Risk Management and Patient Safety Committee is to reduce patient/claimant compensable injuries, reduce Fund losses and associated expenses, improve the general quality of medical care, and reduce the premiums of participating health care providers.

### 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 December 31, 2025, there are 15,152 licensed physicians and certified registered nurse anesthetists who have filed for exempt status.

### IPFCF Exemptions



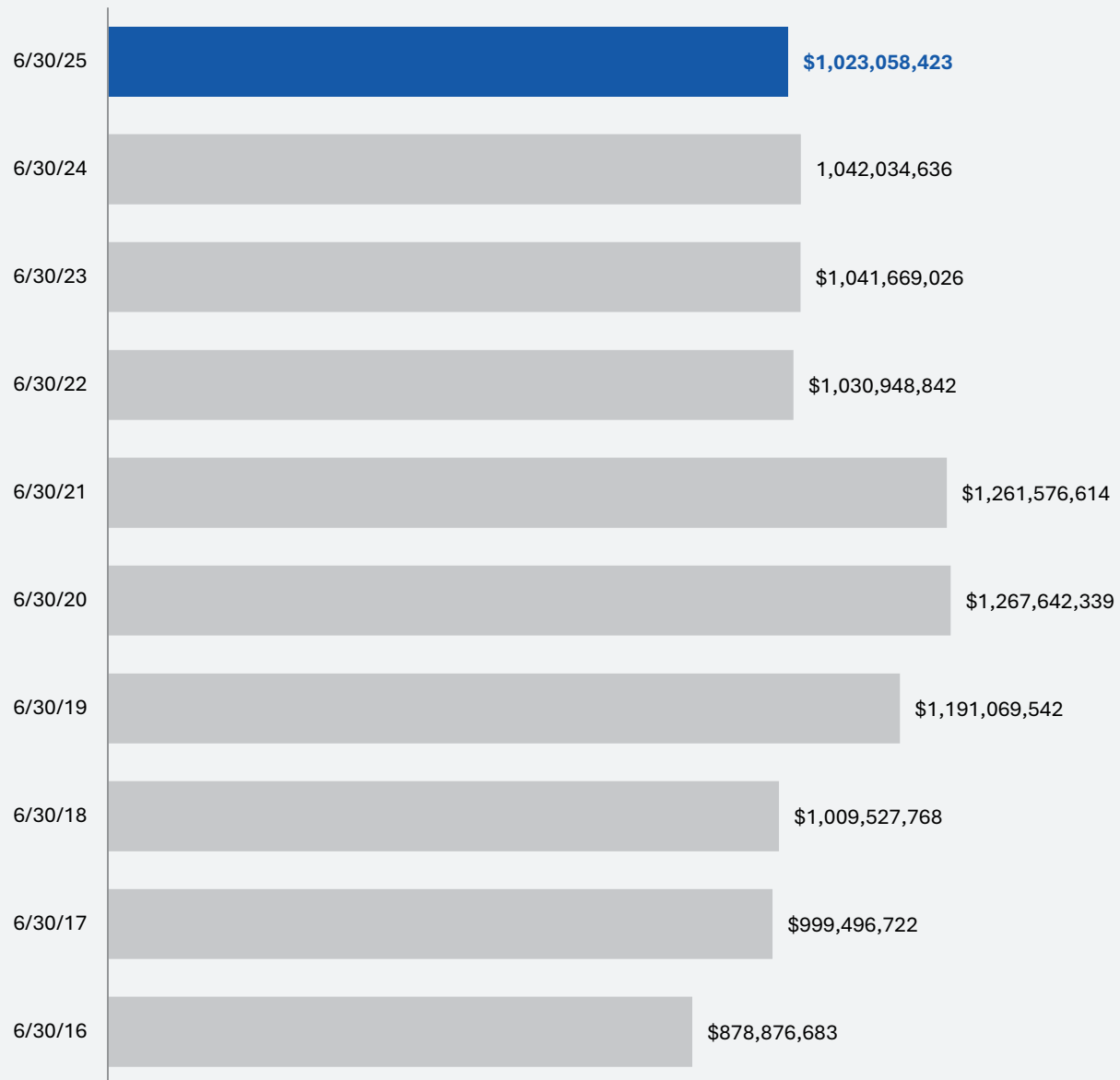
## Financial Statistics

The Fund reports its financial operations from July 1 to June 30, succeeding-year basis as a part of the State of Wisconsin Annual Comprehensive Financial Report (ACFR):

[doa.wi.gov/Pages/StateFinances/ACFR.aspx](https://doa.wi.gov/Pages/StateFinances/ACFR.aspx).

The Fund reported an unaudited net position of \$1,023,058,423 as of June 30, 2025.

## IPFCF Net Position



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/wrs/investments/publications](https://swib.state.wi.us/wrs/investments/publications)

## Operations

The Fund has seven employees: a Fund Manager, a Fund Accountant, a Claims Manager, two Regulatory Specialists, an Administrative Associate, and a Billing 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 CY 25

| Vendor Name                              | Annual       |
|------------------------------------------|--------------|
| Oracle America, Inc                      | 1,745,187.46 |
| Wausau MedMal Mgt Srvcs LLC              | 1,335,960.00 |
| Bank State of Wisconsin Investment Board | 1,121,485.57 |
| Robins Kaplan LLP                        | 800,000.00   |
| Bell, Moore & Richter S.C.               | 567,522.53   |
| Coyne Schultz Becker & Bauer SC          | 420,518.26   |
| Gass Turek LLC                           | 371,019.36   |
| Axley Brynelson Llp                      | 349,857.34   |
| Borgelt Powell Peterson & Frauen, SC     | 268,356.64   |
| Corneille Law Group LLC                  | 266,337.32   |
| Nash Spindler Grimstad & McCracken LLP   | 217,833.22   |
| Supreme Court                            | 179,100.00   |
| Von Briesen & Roper Sc                   | 103,724.26   |





## State Life Insurance Fund

The State Life Insurance Fund (SLIF) is a segregated fund located within OCI. SLIF 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, 2025, there were 20,241 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 practical extent possible, to maintain a ratio of surplus to assets between 7% and 10%. In the calendar year 2025, a distribution of \$2.6 million was paid to policyholders in the form of dividends.

The following are financial statements – balance sheet and income statements – for the State Life Insurance Fund for the year ending December 31, 2025.

## State Life Insurance Fund - Balance Sheet

December 31, 2025

| Assets                               | Amount                       |
|--------------------------------------|------------------------------|
| Bonds                                | \$ 103,317,994               |
| Policy Loans                         | 2,254,088                    |
| Cash and Bank Deposits               | 2,388,863                    |
| Premiums Deferred and Uncollected    | 33,840                       |
| Investment Income Due and Accrued    | 1,118,572                    |
| Other Invested Assets                | <u>2,439,892</u>             |
| <b>Total Assets</b>                  | <b>\$ <u>111,553,248</u></b> |
| Liabilities and Surplus              | Amount                       |
| Life Reserves                        | \$ 65,053,377                |
| Interest Maintenance Reserve         | 2,281,878                    |
| Policy Claims                        | 229,000                      |
| Dividends Due and Unpaid (2025)      | 11,837                       |
| Dividends – Provision for 2026       | 2,704,245                    |
| Deposit Type Contracts               | 29,446,246                   |
| Unclaimed Property                   | 169,788                      |
| Taxes, Licenses, Fees Accrued        | 853                          |
| Suspense and Canceled Drafts         | 99,216                       |
| Expenses Due and Accrued             | 69,379                       |
| Back Up Withholding                  | 1,990                        |
| Premiums Received in Advance         | 16,212                       |
| Asset Valuation Reserve              | <u>700,025</u>               |
| <b>Total Liabilities</b>             | <b>\$ <u>100,784,046</u></b> |
| Surplus                              | <u>10,769,202</u>            |
| <b>Total Liabilities and Surplus</b> | <b>\$ <u>111,553,248</u></b> |

## State Life Insurance Fund - Income Statement

December 31, 2025

| Income                                       | Amount                     |
|----------------------------------------------|----------------------------|
| Premiums                                     | \$ 803,663                 |
| Investment Income                            | 4,369,593                  |
| Amortization of Interest Maintenance Reserve | 671,876                    |
| Miscellaneous Income                         | <u>23,484</u>              |
| <b>Total Income</b>                          | <b>\$ 5,868,616</b>        |
| Expenses                                     | Amount                     |
| Death Benefits                               | \$ 1,591,999               |
| Matured Endowments                           | 199,000                    |
| Other Policy Benefits                        | 1,639,057                  |
| Increase in Reserve                          | (469,178)                  |
| General Operating Expense                    | <u>550,292</u>             |
| <b>Expenses Before Dividends</b>             | <b><u>3,511,170</u></b>    |
| Net Gain before Dividends                    | <u>2,357,446</u>           |
| Dividends to Policyholders                   | <u>2,629,517</u>           |
| <b>Net Gain (Loss) from Operations</b>       | <b>\$ <u>(272,071)</u></b> |





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## 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.

The division reviews and approves insurers to operate in Wisconsin with continued monitoring after licensing or permitting. Monitoring includes the examination of records and review of prospective risk impacting the solvency of insurance companies organized under Wisconsin law, 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 26 domestic insurers and two care management organizations
- Analyzed the financial statements of over 2,060 insurers and regulated entities
- Continued oversight of two companies in liquidation

Other activities include:

### Domestic Insurers

- Licensed domestic entities:
  - One continuing care retirement organization
  - Four property service contract providers
- Issued permits to two Care Management Organizations, under ch. 648, Wis. Stat.
- Reviewed and approved changes of control

involving five domestic insurers, pursuant to holding company regulations

- Reviewed and approved one domestic insurer's holding company reorganization
- Redomiciled one company out of Wisconsin
- Reviewed and approved one town mutual merger into a ch. 611 mutual insurer
- Approved the dissolution of three domestic insurance companies

## Nondomestic Insurers

Licensed nondomestic entities:

- 16 traditional insurers
  - Three life, accident, and health insurers
  - 13 property and casualty insurers
- 16 property service contract providers
- One life settlement 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 seven
  - Renewed 49
- Certified Reinsurers
  - Renewed 15

## 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.
- Transitioned premium taxes and fee collection to OPTins, including moving to a new internal application for tracking.
- Implemented the use of MyWisconsin ID on

the Financial Filing Portal.

## NAIC Activity

- Served on several NAIC task forces and working groups, including acting as chair of the Risk-Focused Surveillance Working Group, co-chair of the Financial Examiners Handbook Technical Group, and vice chair of the Financial Analysis Working Group (complete list of NAIC groups listed on page 25)
- Oversaw examination and analysis of Peer Review Projects

## Companies Examined

ACUITY, A Mutual Insurance Company  
Bloomington Farmers Mutual Insurance Company  
Capitol Indemnity Corporation  
Capitol Specialty Insurance Corporation  
Care Improvement Plus Wisconsin Insurance Company  
Community Care Health Plan, Inc.  
Community Care, Inc.  
Fidelity and Guaranty Insurance Underwriters, Inc.  
Germantown Mutual Insurance Company  
Glencar Insurance Company  
Lakeland Care, Inc.  
McMillan-Warner Mutual Insurance Company  
The Medical Associates Clinic Health Plan of Wisconsin  
MercyCare HMO, Inc.  
MercyCare Insurance Company  
Mt. Morris Mutual Insurance Company  
Reedsburg-Westfield Mutual Insurance Company  
Rural Mutual Insurance Company  
SOCIETY INSURANCE, a mutual company  
Sugar Creek Mutual Insurance Company  
Superior Vision Insurance Plan of Wisconsin, Inc.  
Theresa Mutual Insurance Company  
Thrivent Financial for Lutherans  
Transit Mutual Insurance Corporation of Wisconsin  
West Bend Insurance Company  
West Bend Premier Insurance Company  
West Bend Select Insurance Company  
Wisconsin River Mutual Insurance Company

# Changes in Corporate Licenses

## Wisconsin Insurance Corporations Organized and Licensed

January 1, 2025 – December 31, 2025

| Company                                  | Company Type | City      | State |
|------------------------------------------|--------------|-----------|-------|
| Choice Auto Protection LLC               | SCP          | Elkhorn   | WI    |
| Infiniti Milwaukee, LLC                  | SCP          | Milwaukee | WI    |
| Integrated Marketing Solutions, Inc.     | SCP          | Monroe    | WI    |
| Lupient Imports Milwaukee, LLC           | SCP          | Milwaukee | WI    |
| Oakwood Village Prairie Ridge Homes, Inc | CC           | Madison   | WI    |

## Insurance Corporations Domiciled in Other States Admitted

January 1, 2025 – December 31, 2025

| Company                                       | Company Type | City           | State |
|-----------------------------------------------|--------------|----------------|-------|
| America's Preferred Structural Warranty, Inc. | SCP          | Jackson        | MI    |
| AssuranceAmerica Insurance Company            | PC           | Atlanta        | GA    |
| Assurant Home Solutions, Inc.                 | SCP          | Atlanta        | GA    |
| Bridge City Insurance Company                 | PC           | Pittsburgh     | PA    |
| Caprica Protection Services, INC              | SCP          | Phoenix        | AZ    |
| CareScout Insurance Company                   | LAH          | Glen Allen     | VA    |
| Compsource Mutual Insurance Company           | PC           | Oklahoma City  | OK    |
| Continental Heritage Insurance Company        | PC           | Orange Village | OH    |
| Continental Warranty Inc.                     | SCP          | Claymont       | DE    |
| Dealer Loyalty Protection, Inc.               | SCP          | Mahwah         | NJ    |
| Drivers Edge Insurance Company                | PC           | Traverse City  | MI    |
| DriveSmart Administration, Inc.               | SCP          | Bayville       | NJ    |
| Encore Life Settlements LLC                   | LSP          | Aliso Viejo    | CA    |
| Extended Protection Administration, Inc.      | SCP          | Warrenville    | IL    |
| First Administrative Services Corp.           | SCP          | Austin         | TX    |
| Generali USA Insurance Company                | PC           | New York       | NY    |



## Insurance Corporations Domiciled in Other States Admitted

January 1, 2025 – December 31, 2025

| Company                               | Company Type | City          | State |
|---------------------------------------|--------------|---------------|-------|
| GM National Insurance Company         | PC           | Fort Worth    | TX    |
| HiRoad Assurance Company              | PC           | Bloomington   | IL    |
| Illinois EMCASCO Insurance Company    | PC           | Des Moines    | IA    |
| Incline National Insurance Company    | PC           | Austin        | TX    |
| Lebanon Valley Insurance Company      | PC           | Wyalusing     | PA    |
| Oncourse Home Solutions, LLC          | SCP          | Naperville    | IL    |
| Opportunity Life Insurance Company    | LAH          | Cincinnati    | OH    |
| PAP Alpha, Inc.                       | SCP          | Charleston    | SC    |
| Physicians Insurance A Mutual Company | PC           | Seattle       | WA    |
| Preferred Dealer Solutions, LLC       | SCP          | Rockford      | MI    |
| Premier Dealer Services, Inc.         | SCP          | Dublin        | OH    |
| Securico Life Insurance Company       | LAH          | Austin        | TX    |
| Tuscarora Wayne Insurance Company     | PC           | Wyalusing     | PA    |
| TWG Home Warranty Services, Inc.      | SCP          | Chicago       | IL    |
| VIP National Assurance, Inc.          | SCP          | St. Augustine | FL    |
| VIP Protection Services, Inc.         | SCP          | Phoenix       | AZ    |
| Xeratex Group, LLC                    | SCP          | Sioux Falls   | SD    |

## Changed Company Type

| Company                                    | From        | To                    |
|--------------------------------------------|-------------|-----------------------|
| Central Wisconsin Mutual Insurance Company | Town Mutual | Property and Casualty |
| Lebanon Seneca Mutual Insurance            | Town Mutual | Property and Casualty |

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

January 1, 2025 – December 31, 2025

### Mergers

| Non-Surviving Company                            | Merged into Surviving Company                         | Date       |
|--------------------------------------------------|-------------------------------------------------------|------------|
| Anthem Life Insurance Company                    | Standard Insurance Company                            | 4/1/2025   |
| Argonaut Great Central Insurance Company         | Argonaut Insurance Company                            | 4/30/2025  |
| Augustar Life Assurance Corporation              | Augustar Life Insurance Corporation                   | 12/31/2025 |
| Catholic United Financial                        | Trusted Fraternal Life                                | 1/1/2025   |
| CSA Fraternal Life                               | BetterLife                                            | 10/15/2025 |
| Doma Title Insurance, Inc.                       | Title Resources Guaranty Company                      | 12/31/2025 |
| Homestead Mutual Insurance Company               | Mutual of Wausau Insurance Corporation                | 12/31/2025 |
| Jamestown Mutual Insurance Company               | Eagle Point Mutual Insurance Company                  | 1/1/2025   |
| Republic Mortgage Guaranty Insurance Corporation | United Guaranty Residential Insurance Company         | 6/1/2025   |
| Republic Mortgage Insurance Company              | United Guaranty Residential Insurance Company         | 6/1/2025   |
| Seneca, Sigel Mutual Insurance Company           | Lebanon Seneca Mutual Insurance Company               | 1/1/2025   |
| TIAA-CREF Life Insurance Company                 | Teachers Insurance And Annuity Association of America | 12/31/2025 |
| West Coast Life Insurance Company                | Protective Life Insurance Company                     | 7/1/2025   |

### Dissolutions

| Company                                      | Date       |
|----------------------------------------------|------------|
| AccessCare General Wisconsin Insurance, Inc. | 12/12/2025 |
| Republic Mortgage Assurance Company          | 6/1/2025   |
| WPS Health Plan, Inc.                        | 11/14/2025 |

## Withdrawals

| Company                                        | Date       |
|------------------------------------------------|------------|
| American Water Resources, LLC                  | 12/31/2025 |
| Capital Warranty Services, Inc.                | 12/31/2025 |
| CILAJET, LLC                                   | 3/7/2025   |
| Elixir Insurance Company                       | 3/31/2025  |
| Enumclaw Property & Casualty Insurance Company | 7/8/2025   |
| FABCO Equipment, Inc.                          | 4/22/2025  |
| Health Net Life Insurance                      | 12/31/2025 |
| healthCAR Direct, Inc.                         | 8/26/2025  |
| Midwest Warranty Corp.                         | 12/31/2025 |
| Mutual of Enumclaw Insurance Company           | 7/8/2025   |
| North Central Warranty Company, Inc.           | 4/18/2025  |
| UCare Health, Inc.                             | 12/23/2025 |

## Rehabilitations

None

## Liquidations

| Company                                 | Date       |
|-----------------------------------------|------------|
| Casualty Underwriters Insurance Company | 9/19/2025  |
| Momentum RRG, Inc.                      | 3/10/2025  |
| Transport Insurance Company             | 10/21/2025 |

## Revocations

| Company                    | Date     |
|----------------------------|----------|
| Administration America LLC | 5/1/2025 |

## Redomestications

| Company                                         | From | To | Effective Date |
|-------------------------------------------------|------|----|----------------|
| Aegis Security Insurance Company                | PA   | CA | 12/31/2025     |
| American Water Resources, LLC                   | IL   | VA | 12/30/2025     |
| Anza Mortgage Insurance Corporation             | AZ   | NC | 12/2/2025      |
| Century-National Insurance Company              | CA   | IL | 2/19/2025      |
| Continental Indemnity Company                   | IA   | NM | 1/3/2020*      |
| Corporate Solutions Life Reinsurance Company    | DE   | IA | 4/1/2025       |
| Essent Title Insurance, Inc.                    | MO   | PA | 12/31/2024*    |
| Firemen's Insurance Company of Washington, D.C. | DE   | IA | 12/31/2025     |
| Guarantee Company of North America USA, The     | MI   | AR | 12/29/2025     |
| Humana Insurance Company                        | WI   | KY | 12/1/2025      |
| Lismore Insurance Company                       | MO   | IL | 5/19/2025      |
| MIC General Insurance Corporation               | MI   | IL | 3/19/2025      |
| Midwest Employers Casualty Company              | DE   | IA | 12/31/2025     |
| National General Assurance Company              | MO   | IL | 2/24/2025      |
| National General Insurance Company              | MO   | IL | 2/24/2025      |
| National General Insurance Online, Inc.         | MO   | IL | 2/24/2025      |
| Prosidium Warranty & Capital                    | WA   | AZ | 7/31/2025      |
| T.H.E. Insurance Company                        | LA   | DE | 1/30/2025      |
| Trans World Assurance Company                   | CA   | NV | 5/21/2025      |
| UCare Health, Inc.                              | WI   | MN | 12/23/2025     |
| Xeratex Group, LLC                              | NE   | DE | 6/16/2025      |

\*Information not available in prior Wisconsin Insurance Report.



## Name Changes

| Previous Name                              | New Name                                                         |
|--------------------------------------------|------------------------------------------------------------------|
| American Modern Select Insurance Company   | Trusted Resource Underwriters Exchange of Ohio                   |
| Appleton Motorcars, LLC                    | Tres Vatos Holdings LLC DBA Appleton Motorcars Sales and Service |
| Bestow Life Insurance Company              | Lantern Insurance Company                                        |
| Buckeye Dealership Consulting, LLC         | Buckeye Risk Services, LLC                                       |
| Central Mutual Insurance Company           | Central Insurance Company                                        |
| Cigna National Health Insurance Company    | HealthSpring National Health Insurance Company                   |
| Direct General Life Insurance Company      | Nationwide Life and Benefits Insurance Company                   |
| Fletcher Reinsurance Company               | Lismore Insurance Company                                        |
| Jet Insurance Company                      | Amherst National Insurance Company                               |
| Lebanon-Clyman Mutual Insurance Company    | Lebanon Seneca Mutual Insurance Company                          |
| ManhattanLife of America Insurance Company | Ceres Life Insurance Company                                     |
| Many Insurance Company                     | American Guardian Shield Insurance Company                       |
| MTD Products Company                       | MTD Products Company/Hustler Turf Equipment, Inc.                |
| OHS AssetCo, LLC                           | Oncourse Home Solutions, LLC                                     |
| Physicians Mutual Insurance Company        | Physicians Mutual Insurance Company, Inc.                        |
| PMI Insurance Co.                          | Anza Mortgage Insurance Corporation                              |
| Seel Warranty and Service, Inc.            | Seel Warranty Services, Inc.                                     |
| TT of First Mile Services, Inc.            | First Mile Services, Inc                                         |
| Watford Insurance Company                  | Arch Wilsure Insurance Company                                   |
| Wolverine Mutual Insurance Company         | Wolverine Insurance Company                                      |

# Companies in Liquidation or Rehabilitation

## 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 806 proofs of claims, tentatively broken down by the highest level of priority as of December 31, 2025, which is

subject to revision by the liquidator as follows:

| Quantity |                      | Amount       |                      | Proof of Claim Class                                 |
|----------|----------------------|--------------|----------------------|------------------------------------------------------|
| WRC      | 1 <sup>st</sup> Auto | WRC          | 1 <sup>st</sup> Auto |                                                      |
| 1        | 6                    | \$ 1,587,857 | \$1,866,566          | Class 1 – Administrative Costs                       |
| 257      | 229                  | 13,349,133   | 7,595,272            | Class 3 – Loss Claims                                |
| 53       | 114                  | 1,923,709    | 458,222              | Class 4 – Unearned Premium                           |
| 13       | 73                   | 81,681       | 305,651              | Class 5 – Residual Classification with Some Security |
|          |                      | 790,859      | 362,788              | Class 7 – Interest on Claims Already Paid            |
|          |                      | 11,083       | 35,160               | Class 8 – Miscellaneous*                             |
| 24       | 33                   | 50,267       | 43,554               | Class 8 – Late Filed                                 |
| 3        |                      |              |                      | Class 11 - Stock                                     |

\*This is the miscellaneous portion of the 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.

During 2025, the liquidator:

- Completed the sale of the WRC building and land for \$3.4 million
- Made \$273,437 Class 1 distributions from WRC
- Made \$3,609,380 Class 3 distributions from WRC
- Made \$1,713,906 Class 1 distributions from 1st Auto

As of December 31, 2025, 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, 2025, Wisconsin Reinsurance Corporation, and 1st Auto & Casualty Insurance Company had:

|                          | WRC                | 1 <sup>st</sup> Auto |
|--------------------------|--------------------|----------------------|
| Assets                   | \$23,416,661       | \$8,100,967          |
| Liabilities              | 17,794,589         | 10,667,213           |
| Surplus                  | 5,622,072          | (2,566,245)          |
| <b>Net Income (Loss)</b> | <b>(4,382,488)</b> | <b>(4,048,746)</b>   |



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## Division of Market Regulation and Enforcement

The Division of Market Regulation and 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 these 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 2025, the division investigated and resolved 4,094 written consumer complaints, 2,318 inquiries

and answered over 20,000 telephone and email inquiries. The division received 3,201 rate and rule filings, 4,285 form filings, and 325 advertising material filings.

## Major Accomplishments

### Outreach

In 2025, Consumer Affairs participated in six outreach events in a variety of settings, including consumer education events, training for industry representatives and consumer advocates, disaster response resource centers, and expert panels. OCI's presence provided opportunities for increased awareness of the office and its role in insurance regulation for over a thousand collective attendees. This area remains one of great potential for supporting OCI's mission to protect and educate consumers and Consumer Affairs remains committed to the program for the future.

### 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 2025 used the remote proctoring platform.





## **Collaborative Reports**

The division provided 158 domestic company market regulation analysis reports to the Division of Financial Regulation. OCI continues to refine the use of the OnBase information management platform to improve the sharing of intra-divisional reports between the divisions of Financial Regulation and Market Regulation & Enforcement.

## **Consumer Publications**

Division staff are responsible for regular updates and revisions of a variety of consumer publications available from OCI. In 2025, Consumer Affairs created two new consumer education publications addressing the importance of keeping homeowners insurance after a home mortgage is satisfied, and on factors influencing personal lines. In addition, Consumer Affairs expanded the information provided to consumers seeking coverage for volunteer drivers to include a list of companies that offer this type of coverage.

## **Centers for Medicare & Medicaid Services**

Division staff continued 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. A complete list of NAIC committees, task forces, and working groups where OCI is an active participant is on page 25.

## **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 section 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 13 individual statements: Annuity, Disability Income, Health, Homeowners, Lender-Placed Home/Auto, Life, Long-Term Care, Other Health, Pet, Private Flood, Private Passenger Auto, Short-Term Limited Duration Health, and Travel.

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

| Line of Business                   | Expected Filings | Received Filings* |
|------------------------------------|------------------|-------------------|
| Annuity                            | 112              | 112               |
| Disability Income                  | 61               | 61                |
| Health                             | 23               | 21                |
| Homeowners                         | 127              | 125               |
| Lender-Placed                      | 14               | 14                |
| Life                               | 193              | 193               |
| Long Term Care                     | 69               | 69                |
| Other Health                       | 90               | 90                |
| Pet                                | 17               | 17                |
| Private Flood                      | 6                | 6                 |
| Private Passenger Auto             | 128              | 128               |
| Short-Term Limited Duration Health | 7                | 7                 |
| Travel                             | 19               | 18                |

\* Filings received as of 08/07/2026

## 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 28 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 721 companies for 15 lines of business: individual accident and health, individual major medical, group accident and health, group major medical, health, other health, short-term limited duration health, disability income, individual Life, individual annuity, private passenger auto, homeowners, pet, travel, and credit.

### Grievance Report Analysis

Analysis was completed on 43 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. Letters were sent to companies reminding them to verify the accuracy of the data prior to submitting the reports. Conference calls were conducted based on the results of the analysis.

## ACA Formulary Review

Analysis was completed regarding the coverage of HIV medications on 14 companies for the individual health and small group health lines of business.

## Market Analysis Surveys

Market Analysis surveyed ten companies regarding in-home daycare coverage, and 161 companies regarding private passenger auto volunteer diver coverage.

## Analysis Trends

Market Analysis has identified trends to monitor regarding cybersecurity, the use of artificial intelligence, pharmacy benefit manager operations,

network adequacy, and homeowners storm damage coverage. Market Analysis currently monitors cybersecurity breaches reported to OCI by insurers and participates in the annual cybersecurity certification process.

## Consumer Affairs Section

The Consumer Affairs section is responsible for responding to inquiries and for investigating complaints filed against insurance companies, agents, and other licensed or registered insurance entities. The section works closely with legal counsel to pursue enforcement actions when appropriate. In 2025, 313 complaint investigations resulted in referrals to the legal unit for possible enforcement action.

In 2025, property and casualty insurance experienced the most complaints, followed by health insurance. Among property and casualty inquiries and complaints investigated, the majority were related to homeowners insurance. Among health insurance complaints investigated,

the majority were related to individual health insurance coverage. A considerable majority of complaints investigated across both coverage areas were related to claim handling. These complaint patterns have remained relatively unchanged for several years.

In 2025, the Consumer Affairs section participated in six 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.

In October 2025, OCI transitioned to a new complaint system provided by the National Association of Insurance Commissioners (NAIC). One of the features of NAIC's State-Based Systems (SBS) is that it includes a company complaint portal, giving companies notification of complaint activity, direct access to complaint materials, and a direct avenue for uploading responses and documentation. Since most companies already use other SBS modules, the participation rate is high and continues to grow.

The following tables summarize the 2025 complaint data.

Table I shows complaint activity over the last six years. A complaint may be closed in a different year than it was 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. Initial contact may be in person, by telephone, by email, or via our online complaint portal. While consumers call OCI to report concerns, to initiate a new investigation the complaint must be in writing.

Table I - Total Complaint Cases

| Year | Received | Closed |
|------|----------|--------|
| 2020 | 2,507    | 2,977  |
| 2021 | 2,137    | 2,451  |
| 2022 | 2,469    | 2,671  |
| 2023 | 2,904    | 3,117  |
| 2024 | 3,234    | 3,431  |
| 2025 | 4,094    | 4,007  |

In addition to investigating complaints, the division also handled 23,000 phone calls, e-mails, and other written requests for information in 2025.

Table II shows 2024 and 2025 complaint cases by type of insurance.



**Table II - Complaints Filed by Type of Insurance \***

| Type of Insurance                           | 2024 Complaints     | 2025 Complaints     |
|---------------------------------------------|---------------------|---------------------|
| <b>Accident and Health</b>                  |                     |                     |
| Group Accident and Health                   | 430                 | 628                 |
| Individual Accident and Health              | 457                 | 716                 |
| Long-Term Care                              | 53                  | 42                  |
| Medicare Supplement                         | 111                 | 104                 |
| <b>Total Accident and Health</b>            | <b><u>1,051</u></b> | <b><u>1,490</u></b> |
| <b>Property and Casualty</b>                |                     |                     |
| Automobile                                  | 613                 | 783                 |
| Fire, Allied Lines, Other Property          | 67                  | 54                  |
| General Liability/Liability                 | 63                  | 61                  |
| Homeowners, Tenants, Farm owners            | 697                 | 768                 |
| Worker's Compensation                       | 86                  | 91                  |
| All Other Lines                             | 206                 | 434                 |
| <b>Total Property and Casualty</b>          | <b><u>1,732</u></b> | <b><u>2,194</u></b> |
| <b>Life, Including Credit and Annuities</b> | <b><u>438</u></b>   | <b><u>410</u></b>   |
| <b>Grand Total</b>                          | <b><u>3,221</u></b> | <b><u>4,094</u></b> |

Table III shows the general reason for the complaint. Just over 59% of complaints involved claim handling concerns. Policyholder service was the second most common complaint reason at approximately 19%.

**Table III - Reasons for Complaints \***

| Reason for Complaint | Through Quarter 4 2024 | % of Total | Through Quarter 4 2025 | % of Total |
|----------------------|------------------------|------------|------------------------|------------|
| Claim Handling       | 2,114                  | 58.2%      | 3,746                  | 59.31%     |
| Marketing and Sales  | 492                    | 13.5%      | 987                    | 15.63%     |
| Policyholder Service | 768                    | 21.1%      | 1,227                  | 19.43%     |
| Underwriting         | 258                    | 7.1%       | 356                    | 5.64%      |

\*A complaint may have more than one reason.

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

| Coverage Type      | Claim Handling        | Policyholder Services | Marketing and Sales | Underwriting       | Total                 |
|--------------------|-----------------------|-----------------------|---------------------|--------------------|-----------------------|
| Accident & Health  | \$2,317,652.21        | \$283,747.34          | \$14,491.00         | \$17,012.30        | \$2,632,902.85        |
| Automobile         | \$841,410.90          | \$2,508.85            | \$80,775.00         | \$1,104.88         | \$925,799.63          |
| Fire, Allied Lines | \$110,940.00          | \$20,829.00           | \$599.00            | 0                  | \$132,368.00          |
| Homeowners         | \$1,823,157.44        | \$15,597.20           | \$1,506.00          | \$979.00           | \$1,841,239.64        |
| Liability          | \$42,829.00           | \$223.00              | 0                   | 0                  | \$43,052.00           |
| Life & Annuities   | \$269,951.22          | \$365,763.47          | \$253,061.00        | \$5,683.00         | \$894,458.69          |
| Miscellaneous      | \$282,022.21          | \$14,727.00           | \$1,961.00          | \$604.00           | \$299,314.21          |
| <b>Total</b>       | <b>\$5,687,962.98</b> | <b>\$703,395.86</b>   | <b>\$352,393</b>    | <b>\$25,383.18</b> | <b>\$6,769,135.02</b> |

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 - 2025 Complaint Additional Reviews by Line of Business**

|                              | Accident and Health | Property and Casualty | Life and Annuities | Total |
|------------------------------|---------------------|-----------------------|--------------------|-------|
| Number of additional reviews | 52                  | 60                    | 5                  | 117   |

## 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. Federal law also has an independent review process. Most comprehensive health insurance plans follow the federal law.

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

| Year | Total | Upheld | Reversed |
|------|-------|--------|----------|
| 2023 | 346   | 78.3%  | 21.7%    |
| 2024 | 272   | 77.2%  | 22.8%    |
| 2025 | 241   | 71.8%  | 28.2%    |

## IRO's Determination

| Determination         | Reversed  | Reversed in Part | Upheld     | Annual Total |
|-----------------------|-----------|------------------|------------|--------------|
| Adverse Determination | 53        | 1                | 125        | 179          |
| Experimental          | 13        | 0                | 48         | 61           |
| Rescission            | 0         | 0                | 0          | 0            |
| Pre-existing          | 1         | 0                | 0          | 1            |
| <b>Total</b>          | <b>67</b> | <b>1</b>         | <b>173</b> | <b>241</b>   |

### Determination Definitions:

- 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
- Approving/denying '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
- Managing disclosures to the state from both licensees, other state regulators, and CMS
- Licensing Updates (name, address, email, phone, DRLP changes, etc.)
- Managing changes in residency status
- Approving/denying prelicensing waivers and continuing education exemptions
- Serving as witnesses in legal proceedings
- Handling secondary review of provider/course denials

### Licensing Exams

In 2025, 12,745 individuals took a Wisconsin insurance licensing exam. Of those, 6,344 took the remotely proctored exam and 6,401 took the exam in-person at a physical test site.

### Providers and Education Courses

- 1 new prelicensing education provider
- 2 new prelicensing education courses
- 11 new continuing education providers
- 32 new continuing education courses

## Licensee Counts as of December 31, 2025

| Licensee Type                       | Quantity |
|-------------------------------------|----------|
| Employee Benefit Plan Administrator | 392      |
| Intermediary Agent Individual       | 231,556  |
| Resident                            | 33,453   |
| Nonresident                         | 198,103  |
| Intermediary Firm                   | 12,141   |
| Life Settlement Broker              | 30       |
| Life Settlement Firm                | 14       |
| Managing General Agent Firm         | 79       |
| Managing General Agent Individual   | 137      |
| Navigator Business Entity           | 3        |
| Navigator Individual                | 21       |
| Public Adjuster                     | 347      |
| Pharmacy Benefit Manager            | 34       |
| Reinsurance Intermediary Broker     | 48       |
| Rate Service Organization           | 28       |
| Rate Service Organization           | 28       |
| Reinsurance Intermediary Firm       | 34       |
| Reinsurance Intermediary Manager    | 6        |
| Risk Purchasing Group               | 244      |
| Surplus Lines                       | 2,979    |
| Temporary Insurance Intermediary    | 0        |
| Travel Insurance Firm               | 44       |

## Company Agent Appointment Billing

Agent licensing collected \$28,278,852.00 from 1,113 insurers for our 2026 annual company

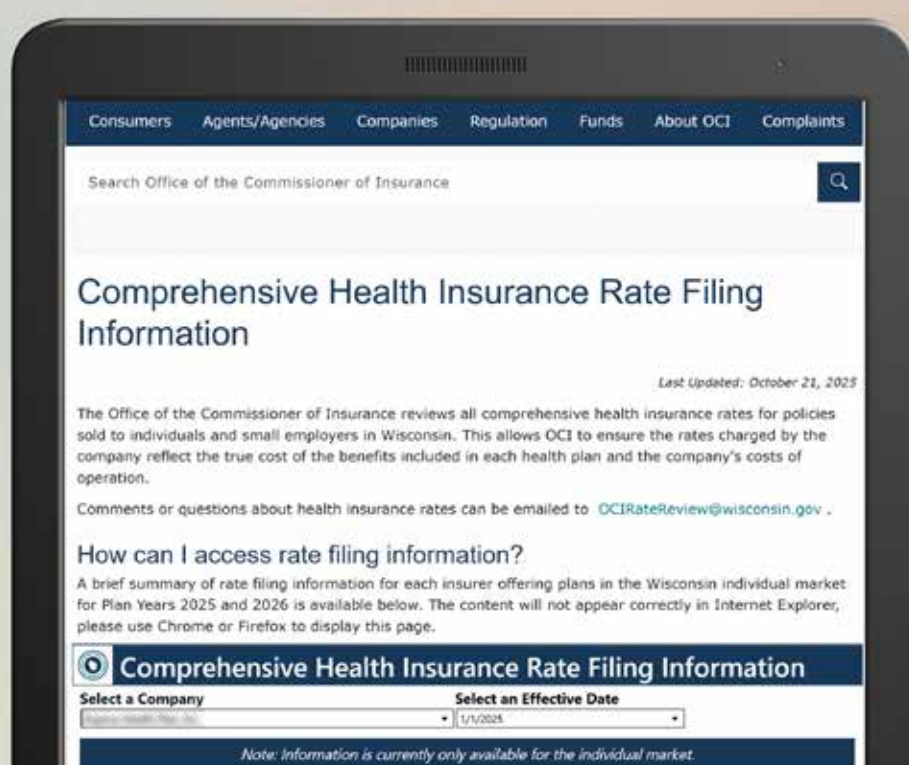




appointment billing cycle for 2025 individual agent appointments. A total of 44 companies failed to pay the invoice due.

## Other Achievements

- Manually reviewed and processed 12,404 licensing applications that were deferred to the state for additional review
- The agent licensing section offered chat functionality 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 8,100 chats.
- The following five state exam series for previously licensed agents have been removed to minimize confusion and prevent misinformation among candidates:
  - WI Accident and Health or Sickness - State Specific Series 22-04 (for previously licensed individuals ONLY)
  - WI Life - State Specific Series 22-02 (for previously licensed individuals ONLY)
  - WI Property - State Specific Series 22-06 (for previously licensed individuals ONLY)
  - WI Casualty - State Specific Series 22-08 (for previously licensed individuals ONLY)
  - WI Personal Lines - State Specific Series 22-10 (for previously licensed individuals ONLY)
- Renamed our license lines of authority to be consistent with nationwide uniformity standards.
  - Accident and Health to Accident and Health or Sickness
  - Variable Life/Variable Annuity to Variable Life and Variable Annuity
  - Personal Lines P & C to Personal Lines
- Continued to take administrative actions against agents as warranted after investigation. A complete list of administrative actions can be found at [oci.wi.gov/Pages/PressReleases/AdminActions.aspx](https://oci.wi.gov/Pages/PressReleases/AdminActions.aspx).
- In collaboration with our exam 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-related committees, task forces, and working groups to assist in improving the effectiveness, efficiency, and uniformity of state licensing processes. A complete list of NAIC committees, task forces, and working groups where OCI is an active participant is on page 25.



## 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 therefore critical to a well-functioning market.

The Rates and Forms section is responsible for establishing and enforcing rate and form filing requirements, reviewing comprehensive individual and small group rate and form 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.

P&C rate and form filings are largely filed and used, meaning their rates must only be filed with

our office but do not need proactive regulatory approval before they may be used on the open market. Life and annuity rate and form filings are generally filed with the Interstate Insurance Product Regulation Commission (The Compact). Long-term care and Medicare supplement rates are routinely sent out for actuarial review if the rate changes exceed 10%.

## Additional Activities

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

## System for Electronic Rates & Forms Filing (SERFF) Modernization

As the NAIC is in the process of modernizing the SERFF application, Wisconsin, as well as other states, have been providing input and following the progress of this project closely. Once available, filing reviews and search capabilities should be greatly enhanced. Some early-adopter states are already transitioning to the new SERFF functionality for some product lines. The Compact was the first to get access to the modernization efforts and has been working closely with the NAIC on this effort.









Wisconsin Office of the  
**COMMISSIONER**  
**OF INSURANCE**

**Wisconsin Office of the Commissioner of Insurance**

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