



MUTUAL OF OMAHA INSURANCE COMPANY

3300 Mutual of Omaha Plaza, Omaha, NE 68175

November 1, 2019

Robert Chester, Insurance Associate Examiner
Life & Health Unit, Market Conduct Division
Connecticut Insurance Department
P.O. Box 816
Hartford, CT 06142-0816

RE: Market Conduct Examination Survey
Mutual of Omaha Insurance Company
Examination Period – January 1, 2017 – December 31, 2017

Dear Mr. Chester:

Pursuant to the requirements of the Stipulation and Consent Order signed on August 14, 2019, please see the following actions taken because of the findings in the referenced Market Conduct Survey report.

Finding

Thirty-seven (37) producers acting as agents without required appointments.

Corrective Action

In some cases, the Company had screen prints from its licensing and appointment system showing appointments on the dates applications were taken. However, we were unable to provide proof that the appointment was sent to the state.

The Company has a quarterly agent appointment reconciliation process which compares Company records and state appointment information. During the examination period, there was a large backlog of outliers which had not been resolved. Prior to third quarter, 2019, the resolution process for outliers was manual. Beginning in third quarter 2019, the reconciliation program was updated to automatically handle certain outliers without manual intervention. We believe this will help ensure outliers are resolved promptly and the Company's appointment information aligns with the state's information.

Finding

Failure to rescind one (1) policy within the contestability period.

Corrective Action

The Company's claims training materials have been updated to require all rescissions in Connecticut to be referred to its Legal area for review prior to any rescission action. We believe this will ensure the Company does not handle rescissions outside of Connecticut's requirements.

It is our understanding that this examination is closed upon submission of this information. Please let me know if you have any questions.

Sincerely,

Pamela Bishop
Manager, Market Conduct
Compliance and Ethics