



November 1, 2019

Mr. James Stowe
Associate Examiner
Market Conduct Division
Connecticut Insurance Department
P.O. Box 816
Hartford, CT 06142-0816

RE: Market Conduct Examination Report dated October 7, 2019
New England Mutual Insurance Company

Please accept the following as our report and summary of actions taken to comply with the areas of concern and recommendations raised by the Connecticut Insurance Department in the above referenced report.

Producer Licensing

Quincy Group has undertaken a complete review of our practices and procedures with respect to the producer licensing concern raised in your report. We have made updates to automate our systems over the past several years to help ensure that only policies with appointed producers can be issued into our policy issuance system. Additional tables and fields were added for capturing producer names, license numbers, appointment dates, and expiration dates. These fields were linked to the policy issuance system. Currently, if a policy is entered where no match is found in the table, a message is produced to the underwriter to refer the application to our marketing department for licensing verification. Marketing follows up with the agency to obtain the correct data and documentation. Most times the errors are due to nicknames used on the applications that don't match the formal name on the license. We will either issue the policy using the corrected data or marketing will appoint new producers as needed and add the names and data to our system.

There is still a manual component to this process and, therefore, subject to human error. The cases noted in your report were mainly Massachusetts producers that were also licensed in CT. These rejected out into the manual underwriter review. They were looked up in our system and when the names were shown in the tables with a valid CT license, the applications were put through our system. There was a misunderstanding with one employee where they didn't realize that a valid license was not the same as the company appointment.

Since this finding, we have provided training to staff and will now have them also check the unmatched names for verification under the CT Insurance Department License and Appointment Inquiry tool on the [HTTPS://CIDonline.ct.gov](https://CIDonline.ct.gov) site. If not found on that listing, we will call the agencies and appoint appropriately. We will also continue to run audits to verify and update our system data against the CT DOI data.

I hope this addresses your concerns. Please let me know if additional information is needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan M. Sullivan'.

Susan M. Sullivan
Regulatory Affairs Analyst