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October 20, 2021

Stephen DeAngelis, Principal Examiner  
Market Conduct Division  
State of Connecticut Insurance Department  
P.O. Box 816  
Hartford, CT 06142-0816

Re: Colonial Life & Accident Insurance Company ('Company') – Market Conduct Report,  
dated July 20, 2021 ('Report')

Dear Mr. DeAngelis:

Please accept this letter as our response to the Recommendations contained in the above-referenced Report and related Stipulation and Consent Order, Docket MC 21-44.

Stipulation and Consent Order

2. During the period under examination. Respondent failed to follow established practices and procedures to ensure compliance with statutory requirements, resulting in instances of:
  - a. failure to pay claims without conducting a reasonable investigation
  - b. failure to pay claims in a timely manner
  - c. failure to pay interest on claims not paid in a timely manner

The Company's response to each Stipulation and Consent Order item and Report Recommendation are below:

2.a, b, & c and Report Recommendations

**It is recommended that the Companies review their claim handling procedures to ensure that all claims are investigated and resolved in accordance with Connecticut requirements.**

**It is recommended that the Companies review their claim handling procedures to ensure that all claims are investigated and resolved pursuant to required claim settlement practices.**

Response

The Company provided guidance to the claims specialists involved and their managers on the importance of conducting a diligent investigation. The Company provided guidance to the claims specialist involved and their manager on the importance of paying interest

when a claim is not paid within a specific timeframe. The Assistant Vice President Voluntary Benefits Claims advised her direct reports to remind their teams of the importance of providing timely and accurate claims handling.

If you have any questions or need additional information regarding these matters, please contact me at 423-294-1069 or [carlajohnson@unum.com](mailto:carlajohnson@unum.com).

Sincerely,

Carla Johnson  
Market Conduct Manager