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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: Provident Life and Accident Insurance Company ('Company') – Market Conduct Report, dated July 20, 2021 ('Report')

Dear Mr. DeAngelis:

Please accept this letter as our response to the Recommendation contained in the above-referenced Report and related Stipulation and Consent Order, Docket MC 21-45.

Stipulation and Consent Order

3. 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 a claim in a timely manner
 - b. failure to pay interest on a claim not paid in a timely manner

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

3.a & b and Report Recommendation

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 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 carlajohnson@unum.com.

Sincerely,

Carla Johnson
Market Conduct Manager