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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: Unum Life Insurance Company of America ('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 21-43.

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
  - c. insufficient documentation for regulatory review

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.

3.c. and Report Recommendation

**It is recommended that the Companies review their underwriting policies and procedures to ensure that sufficient documentation is maintained for regulatory review.**

Response

In 2017, the Company implemented a digital platform in which the signing broker's name is captured on the legal documents that are presented to the client. For the clients and brokers that elect to sign paper applications, policies and procedures were updated in July 2021 to review all master applications to verify that the signing broker name is printed on the application. The Company also issued a communication to the sales organization indicating the signing broker name requirement for paper master applications.

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