

Oregon Insurance Division's Marketplace Enforcement Actions 1998 to 2016

Presented to Oregon House Business
and Labor Committee

By Paul Terdal

March 15, 2017

Introduction

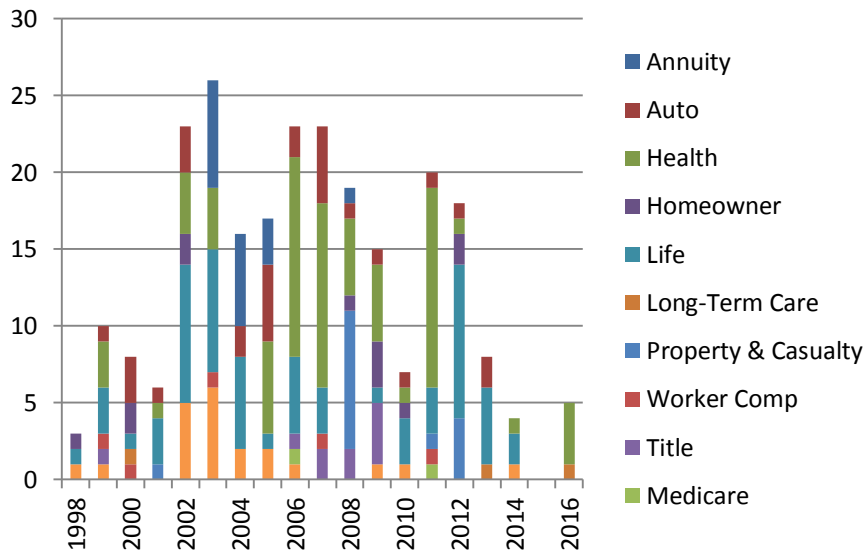
- This report compiles and analyzes data on Marketplace Enforcement Actions taken by the Oregon Insurance Division against insurers in all lines of business, from July 1998 through December 2016
 - Source: Published Enforcement Actions on the Oregon Division of Financial Regulation’s Website: <http://dfr.oregon.gov/laws-rules/Pages/notices-orders.aspx>
- Contents:
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 - Includes case numbers, comments describing the specific violations, and a “Violation Type” assigned for graphical analysis (e.g., Claim / Appeal processing, Issuing to Unapproved Entity, violation of Chapter 743A Health Mandates)
 - Section 3: Marketplace Enforcement Actions against All Insurers
 - Includes summary of data for all lines of insurance, with date, insurance type (line), violation, and penalty
- Prepared by: Paul Terdal
 - Consumer advocate

Section 1: Graphs

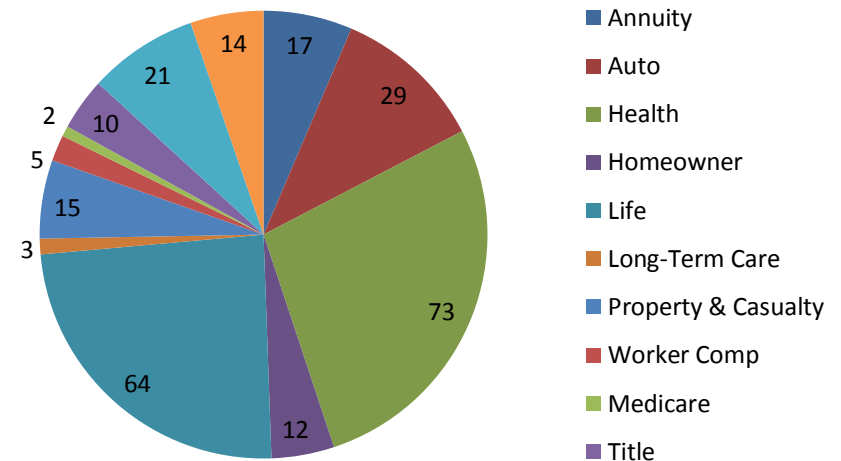
- Graphical analysis of Marketplace Enforcement Actions and Financial Penalties by Line of Insurance and (for Health Insurance) Violation Type for 1998 to 2016
- Includes graph of Consumer Complaints by Line of Insurance for 2009 to 2015

Marketplace Enforcement Actions by Insurance Type since 1998 (All Lines of Insurance)

Number of Enforcement Actions by Insurance Type, Year



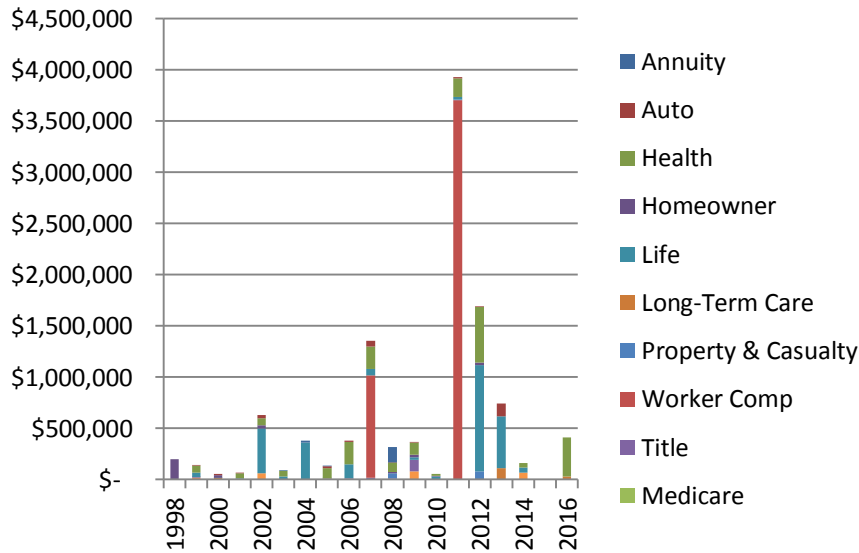
Number of Enforcement Actions by Insurance Type, Since 1998



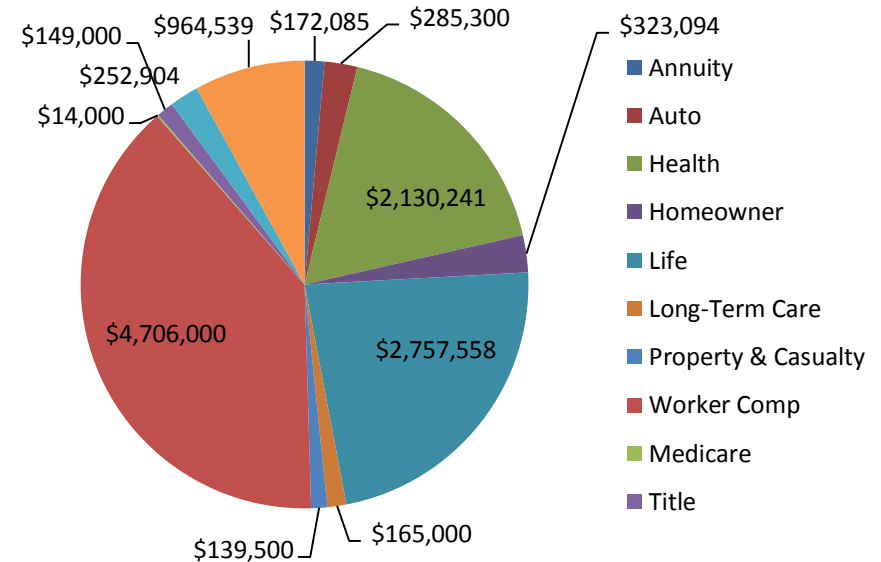
• Source: <http://dfr.oregon.gov/laws-rules/Pages/notices-orders.aspx>

Marketplace Financial Penalties by Insurance Type since 1998 (All Lines of Insurance)

Financial Penalties by Insurance Type, Year



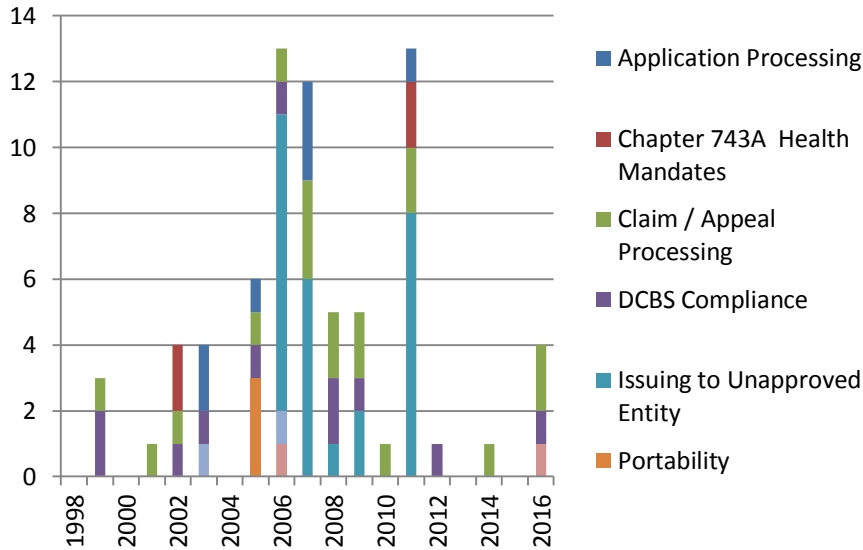
Financial Penalties by Insurance Type, Since 1998



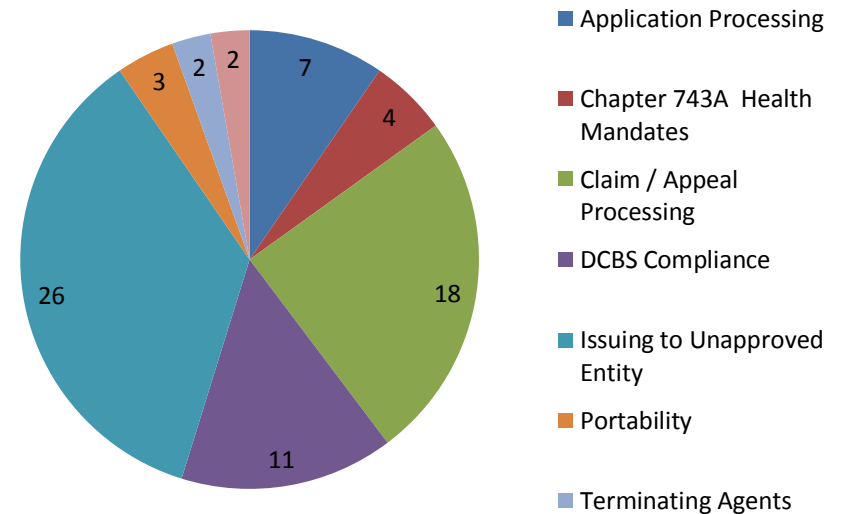
• Source: <http://dfr.oregon.gov/laws-rules/Pages/notices-orders.aspx>

Marketplace Enforcement Actions by Violation since 1998 (Health Insurance)

Health Insurer Enforcement Actions by Violation, Year



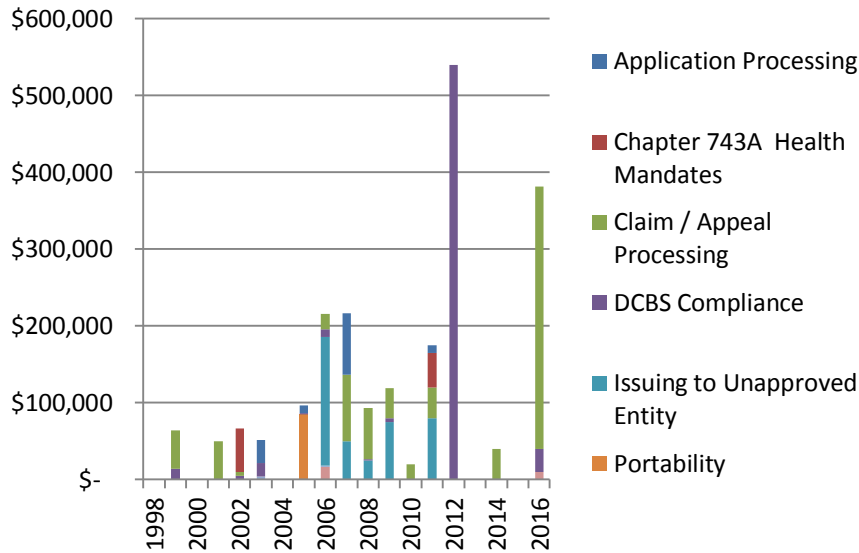
Health Insurer Enforcement Actions by Violation, Since 1998



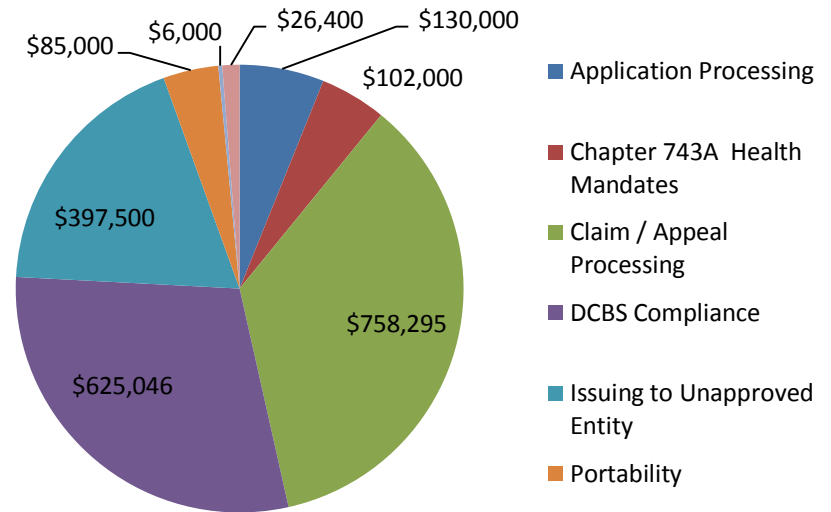
• Source: <http://dfr.oregon.gov/laws-rules/Pages/notices-orders.aspx>

Marketplace Financial Penalties by Violation since 1998 (Health Insurance)

Health Insurer Financial Penalties by Violation, Year



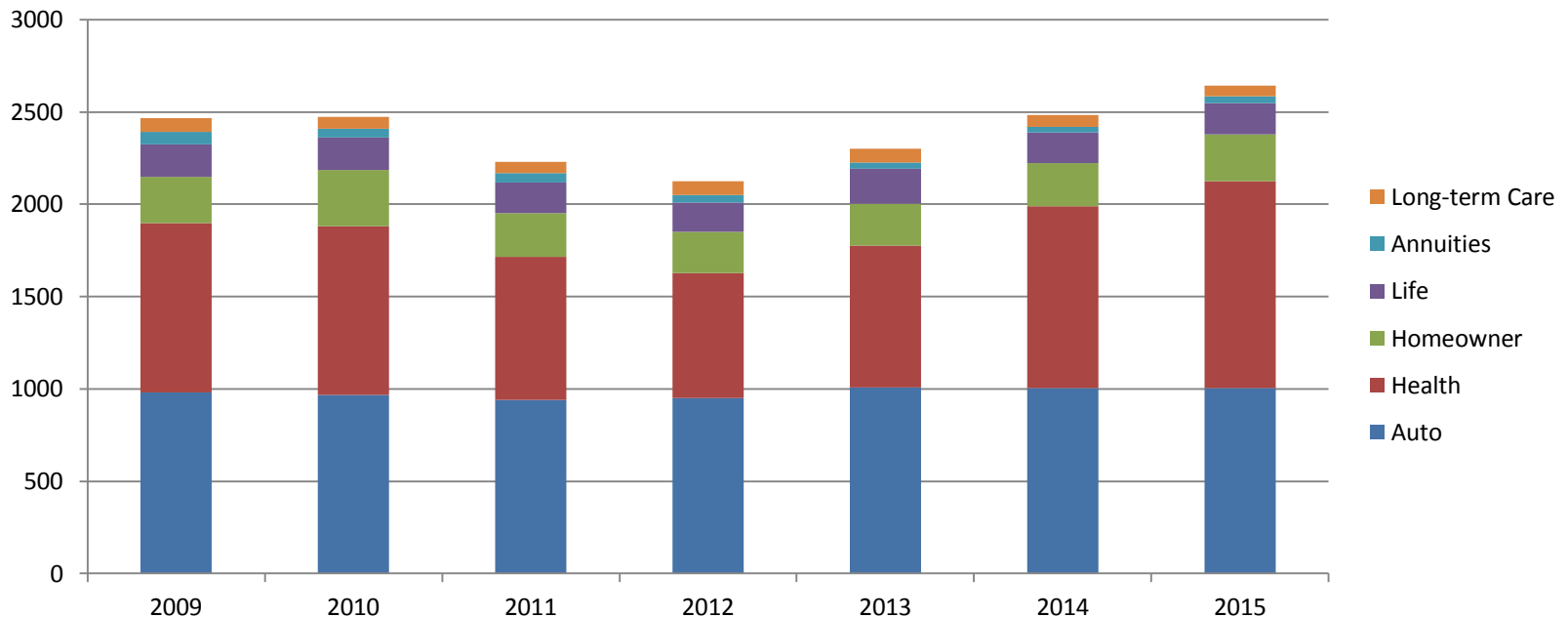
Health Insurer Financial Penalties by Violation, Since 1998



• Source: <http://dfr.oregon.gov/laws-rules/Pages/notices-orders.aspx>

Consumer Complaints since 2009 (All Lines of Insurance)

Consumer Complaints by Insurance Type, Year



- Source: <http://dfr.oregon.gov/community/Pages/complaint-data.aspx>

Section 2: Marketplace Enforcement Actions against Health Insurers

- Includes case numbers, comments describing the specific violations, and a “Violation Type” assigned for graphical analysis (e.g., Claim / Appeal processing, Issuing to Unapproved Entity, violation of Chapter 743A Health Mandates)

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
1999	2/16/1999	Providence Health Plan	Portland, OR	Violation: Failed to respond promptly to two inquiries from the Director.	DCBS Compliance	98-10-011	<p>Failure to Provide Biographical Information On December 18, 1997, the Insurance Division sent a letter to Providence requesting it to provide to the Insurance Division new biographical information about Providence's officers and directors by February 5, 1998. Providence provided the information about most of its officers and directors on July 15, 1998 and the information about the remaining officers and directors on October 28, 1998.</p> <p>Failure to Provide Amended Holding Company Registration Statement On August 5, 1998, the Insurance Division sent a letter to Providence requesting it to provide to the Insurance Division an amended holding company registration statement by August 25, 1998. Providence provided the amended statement on December 31, 1998.</p>	Penalty: \$2,000 fine.
1999	3/4/1999	PacifiCare of Oregon, Inc.	Lake Oswego, OR	Violation: Failed to comply with state standards for the handling of health insurance claims.	Claim / Appeal Processing	98-10-006	<p>PacifiCare, itself and by its authorized provider groups, failed to acknowledge or pay claims within 20 working days after being notified of the claims . (OAR 836-080-225(1)).</p> <p>PacifiCare, by its authorized provider groups, failed to provide a written explanation of the basis relied on in the insurance policy in 67 percent of the denied claim files examined . (OAR 836-080-235(1)).</p> <p>PacifiCare, itself and by its authorized provider groups, failed to notify first party claimants that PacifiCare needed more time to determine whether to accept or deny the claims and the reason for such delay within 20 working days after being notified of the claims and every 45 days thereafter while the investigation remained incomplete . (OAR 836-080-235(3)).</p> <p>PacifiCare, by its authorized provider groups, denied claims without conducting a reasonable investigation. (ORS 746.230(1)(d)).</p>	Penalty: \$50,000 fine.
1999	8/2/1999	Fortis Insurance Company - Time	Milwaukee, WI	Violation: Incorrect premiums were charged. Responded 49 days late to an Insurance Division request.	DCBS Compliance	99-05-013	<p>Fortis used unapproved health insurance rates.</p> <p>Fortis failed to promptly respond to an inquiry from the Director.</p>	Penalty: \$12,000 fine.

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2001	3/7/2001	QualMed Oregon Health Plan, Inc.	Clackamas, Oregon	Violation: Failed to comply with state standards for handling of health insurance claims.	Claim / Appeal Processing	00-10-012	<p>Refusing to Pay Claims Without Conducting a Reasonable Investigation QualMed refused to pay 32 percent of the claims examined without conducting a reasonable investigation of the claim. The majority of failures were due to the Company denial of a claim without first requesting additional information that may have rendered the claim payable and failing to forward claims to delegated provider groups for payment.</p> <p>Imposing an Impermissible Requirement to Prove Prior Creditable Coverage QualMed's underwriting manual indicated that QualMed imposed pre-existing conditions in violation of state law. Specifically, it did not allow proper credit for prior insurance provided by the Oregon Health Plan.</p> <p>Impermissibly Using Individual Health Statements QualMed's underwriting manual also indicated that QualMed used information about the health of individuals in violation of state law. Specifically, QualMed used individual health information when underwriting newly eligible subgroups of associations with two to ten employees. State law allows the use of individual health statement underwriting only when an applicant is a late enrollee.</p>	Penalty: \$50,000 fine.

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2002	2/4/2002	Fortis Insurance Company	Milwaukee, Wisconsin	Violation: Used impermissible information to evaluate an applicant's health status. Refused to pay a claim without conducting a reasonable investigation. Issued health insurance policies without providing maternity coverage. Failed to promptly respond to the DCBS director.	Chapter 743A Health Mandates	01-11-003	<p>On 4/5/00, James Wiedemann (Wiedemann) of Sherwood, Oregon applied to Fortis, application number 0050005101, for individual health insurance insuring Wiedemann and his family. Wiedemann answered "No" to all of the questions on the application pertaining to himself. Nevertheless, on 4/20/00, Fortis requested Wiedemann provide to Fortis a dried blood spot test, a urine specimen, a "Build and Blood Pressure Exam," and the name and address of the doctor that would have the most complete medical history of Wiedemann. On 6/14/00, Fortis refused to provide to Wiedemann the insurance applied for because of unspecified information that Fortis had requested and received from the Medical Information Bureau (MIB) but was not disclosed on the application.</p> <p>On 5/21/98, Fortis issued to Brenda D. Lane (Lane) of Scappoose, Oregon an individual health insurance policy, number 4803299, insuring Lane and her family. Pursuant to the policy, Fortis agreed to pay for covered charges for, inter alia, complications of pregnancy including medically necessary caesarian section, and for injury or illness to a newborn child for 60 days from birth. On 4/12/99, while the policy was effective, Lane had an emergency cesarean section due to complications of pregnancy and gave birth to a baby girl. The baby received some unspecified medical care after her birth due to some complications during her birth. Subsequently, Lane filed with Fortis a claim for payment of some of the cost for the medical care provided to Lane and her baby. However, Fortis initially refused to pay the claim. On 3/24/00, Lane filed a complaint with the Insurance Division. On 4/21/00, after the Insurance Division intervened, Fortis decided to pay the claim.</p>	Penalty: \$42,000 fine
2002	3/26/2002	Life Wise, A Premera Health Plan, Inc.	Portland, Oregon	Violation: Failed to promptly provide an insured with the proper explanation of the basis used to deny a claim.	Claim / Appeal Processing	01-07-008	<p>LifeWise failed to provide a proper explanation for the basis on which coverage was denied. The policy excludes from coverage cosmetic or reconstructive surgery unless such surgery is the result of an accidental bodily injury that occurs while a person is insured by the policy. McKenna Zinn's scar was the result of the dog bite injury and therefore the result of an accidental bodily injury under the terms of the policy. Although the policy authorized LifeWise to deny coverage for procedures that were not medically necessary, LifeWise failed to consistently and promptly provide the insured with the proper explanation for the denial.</p>	Penalty: \$5,000 fine
2002	7/1/2002	Western Grocers Employee Benefits Trust	Portland, Oregon	Violation: Failed to comply with market conduct examination recommendations.	DCBS Compliance	02-04-021	<p>The Insurance Division conducted a special target market conduct examination of Western Grocers for the period from 1/1/98 to 3/31/99, pursuant to ORS 731.300 et seq. The purpose of the examination was to determine whether Western Grocers was complying with the Patient Protection Action of 1997 (Oregon Laws 1997, Chapter 343 (Senate Bill 21)). On 11/5/99, the Insurance Division issued a report of the examination.</p>	Penalty: \$5,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2002	10/29/2002	National Health Insurance Company	Dallas, Texas	Violation: Failed to conduct a reasonable investigation of claims.	Chapter 743A Health Mandates	02-10-001	ORS 743A.104 - Pelvic ORS 743.728 requires all health insurance policies issued to persons residing in Oregon to include, among other things, coverage for both annual pelvic examinations and annual Pap smear examinations, for women 18 to 64 years of age. Since late 1999, NHIC had issued individual health insurance policies, based on form USAI+100 (10/99), to persons residing in Oregon. The policies did not cover routine physical examinations for adult insureds. However, the policies did cover annual pelvic examinations and cervical cytologic screenings, also known as Pap smear examinations, for female insureds. However, NHIC interpreted its policy to cover annual pelvic examinations of female insureds only when they included Pap smear examinations. From 2000 to March 2002, NHIC received 342 claim forms from female insureds residing in Oregon for annual pelvic examinations or Pap smear examinations or both. However, the claim forms indicated that the claims were for only periodic physical examinations. Consequently, NHIC denied all of the claims without investigating whether the examinations included pelvic examinations or Pap smear examinations or both. In February 2002, the Insurance Division received a complaint from one of the denied claimants. In March 2002, the Insurance Division informed NHIC of the requirements of ORS 743.728(1)	Penalty: \$15,000 fine
2003	7/14/2003	American Family Mutual Insurance Company	Madison, Wisconsin	Violation: Used unauthorized methods to determine the health status of applicants.	Application Processing	03-04-023	violated ORS 743.766(1) in 165 instances by, from 12/19/00 to 12/6/02, ordering paramedical examinations which provided medical information that AFMIC used to evaluate the health status of applicants applying for individual health coverage, and which exceeded the scope of the Oregon Standard Health Statement.	Penalty: \$10,000 fine
2003	10/24/2003	ODS Health Plan, Inc.	Portland, Oregon	Violation: Failed to comply with recommendations from market conduct examinations.	DCBS Compliance	03-08-014	The 16 recommendations that ODS failed to comply with related to (1) failing to timely send proper notice of portability rights, (2) contracting with unapproved associations, (3) issuing negotiated policies that did not include mandated benefits, and (4) other administrative violations. The Exhibit A doesn't specify which mandated benefits were missing.	Penalty: \$17,500 fine. An additional \$20,000 fine will be imposed if a follow-up examination shows ODS hasn't complied with recommendations from earlier exams.
2003	10/27/2003	National Health Insurance Company	Dallas, Texas	Violation: Terminated agents without sufficient notice.	Terminating Agents	03-09-021	From 2/1/01 to 12/9/02, NHIC terminated 38 agents that were authorized to represent NHIC in Oregon without giving them at least 90 days written notice and without specifying the reason for the termination.	Penalty: \$3,800 fine
2003	11/25/2003	Fortis Insurance Company	Milwaukee, Wisconsin	Violation: Used unauthorized methods to determine the health status of applicants.	Application Processing	03-09-025	Fortis violated ORS 743.766(1) and OAR 836-053-0510(2) in 220 instances by, from 1/3/00 to 4/22/03, ordering 220 paramedical examinations on applicants for individual health insurance which provided medical information that Fortis used to evaluate the health status of the applicants, and which exceeded the scope of the Oregon Standard Health Statement.	Penalty: \$20,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2005	4/12/2005	Great-West Life & Annuity Insurance Company	Greenwood Village, Colorado	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Portability	05-02-010	Great-West Life violated OAR 836-053-0750(1) in 88 instances by engaging in the following conduct. OAR 836-053-0750(1) requires a insurer that offers group health benefit plans in Oregon to, inter alia, provide an explanation of portability coverage directly to an individual losing group coverage, for any reason other than group replacement of coverage, within 10 days following the date of any administrative action taken by a carrier to initiate or document the loss of coverage.	Penalty: \$20,000 fine
2005	4/12/2005	PacifiCare Life Assurance Company	Santa Ana, California	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Portability	05-02-008	At all relevant times, PacifiCare Life was an a insurer that offered group health benefit plans in Oregon. In 2003, PacifiCare Life included an explanation of portability coverage in its group health insurance policies and summary plan descriptions issued in connection with such policies, but failed to provide an explanation of portability coverage directly to 353 individuals losing group coverage for a reason other than group replacement of coverage.	Penalty: \$40,000 fine
2005	5/23/2005	Health Net Health Plan of Oregon, Inc.	Tigard, Oregon	Violation: Denied applications for individual health insurance without informing applicants of the existence of the Oregon Medical Insurance Pool (OMIP).	Application Processing	05-02-007	From 1/1/01 to 10/7/04, Health Net denied 950 applications for individual health insurance without informing the applicants about the existence of OMIP	Penalty: \$10,000 fine
2005	5/23/2005	Pacific Hospital Association dba PacificSource Health Plans	Eugene, Oregon	Violation: A follow-up market conduct examination found that PacificSource refused to pay 16 claims without conducting a reasonable investigation.	Claim / Appeal Processing	03-08-022	The Insurance Division conducted a standard market conduct examination of PacificSource as of 12/31/99 to determine whether PacificSource was generally complying with the Oregon Insurance Code and related administrative rules relating to complaint handling, claims handling, and underwriting. The Insurance Division found that PacificSource had not complied with 15 provisions of the Insurance Code and related rules and recommended that PacificSource comply with such laws. Subsequently, the Insurance Division conducted a follow up market conduct examination of PacificSource as of 6/30/02 to determine whether PacificSource had complied with the recommendations from the prior examination. On 9/16/03, the Insurance Division filed a final report of the follow up examination, which is incorporated herein by this reference. In the report, the Insurance Division found that PacificSource had not complied with seven of the 15 recommendations from the prior examination including the recommendation relating to ORS 746.230(1)(d). The Insurance Division found that PacificSource violated ORS 746.230(1)(d) in 16 instances by engaging in the following conduct. ORS 746.230(1)(d) prohibits a person from refusing to pay claims without conducting a reasonable investigation based on all available information. In a sample of 50 out of 155 claims files, PacificSource denied 14 claims for emergency room services, one claim for outpatient services, and one claim for a medical screening exam, without investigating whether each claimant's symptoms qualified as an emergency medical condition. See final examination report pp.16-17.	Penalty: PacificSource was fined \$10,000. However, the fine is suspended until the Insurance Division conducts another follow-up market conduct examination. The fine will be withdrawn if the exam finds that PacificSource complied with ORS 746.230(1)(d) during the period examined, or reinstated if the exam shows the company didn't comply with the statute.

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2005	6/27/2005	United of Omaha Life Insurance Company	Omaha, Nebraska	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Portability	05-02-009	From 1/1/03 to 8/1/04, United of Omaha Life failed to provide an explanation of portability coverage directly to 105 individuals losing group coverage for a reason other than group replacement of coverage.	Penalty: \$25,000 fine
2005	8/29/2005	Regence Blue Cross Blue Shield of Oregon	Portland, Oregon	Violation: Failed to timely respond to an inquiry from the DCBS director.	DCBS Compliance	05-05-006	On 1/11/05, the Insurance Division requested Regence to send certain information to the Insurance Division by 1/28/05. Regence believed that they did not have to respond because they had previously provided to the Insurance Division the same or similar information. After several follow up communications, Regence provided the information to the Insurance Division on 5/2/05.	Penalty: \$2,000 fine
2006	3/1/2006	Ameritas Life Insurance Corp.	Lincoln, Nebraska	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	06-01-012	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2006	3/15/2006	Hartford Life and Accident Insurance Company	Simsbury, Connecticut	Violation: Issued group health insurance policies to unapproved associations.	Issuing to Unapproved Entity	06-01-009	Failed to file association approval form with DCBS	Penalty: \$17,500 fine
2006	3/21/2006	Central United Life Insurance Company	Houston, Texas	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	06-01-011	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2006	5/22/2006	LifeWise Health Plan of Oregon, Inc.	Portland, Oregon	Violation: Failed to acknowledge and act promptly on claim communications.	Claim / Appeal Processing	05-02-011	three alleged violations: (1) failing to implement reasonable claim investigation standards and refusing to pay claims without a reasonable investigation; (2) failing to acknowledge and act promptly upon communication about a claim; and (3) failing to timely acknowledge a grievance or appeal.	Penalty: \$20,000 fine
2006	6/13/2006	Pacific Grocers Employee Benefits Trust	Seattle, Washington	Violation: Transacted insurance in Oregon as an insurer without a license. Filed financial documents late.	Unlicensed	06-04-031		Penalty: \$16,400 fine
2006	7/10/2006	Chesapeake Life Insurance Company, The	Richland Hills, Texas	Violation: Issued group health insurance policies to unapproved associations.	Issuing to Unapproved Entity	06-05-041	Failed to file association approval form with DCBS	Penalty: \$45,000 fine
2006	9/11/2006	Chesapeake Life and Health Insurance Company, The	North Richland Hills, Texas	Violation: Terminated agents without sufficient notice.	Terminating Agents	06-07-010	From 1/1/05 to 5/5/06, Chesapeake terminated 18 insurance producers who were authorized to represent Chesapeake in Oregon without giving at least 90 days written notice or without specifying the reason or both.	Penalty: \$2,200 fine
2006	9/27/2006	National Union Fire Insurance Company of Pittsburgh, Pennsylvania	New York, New York	Violation: Issued group health insurance policies to unapproved associations.	Issuing to Unapproved Entity	06-06-012	Failed to file association approval form with DCBS	Penalty: \$30,000 fine
2006	9/28/2006	AIG Life Insurance Company	Wilmington, Delaware	Violation: Issued group health insurance policies to unapproved associations.	Issuing to Unapproved Entity	06-06-013	Failed to file association approval form with DCBS	Penalty: \$10,000 fine
2006	10/2/2006	AF&L Insurance Company	Warrington, Pennsylvania	Violation: Issued a group health insurance policy to unapproved association.	Issuing to Unapproved Entity	06-07-013	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2006	10/2/2006	Health Net Health Plan of Oregon, Inc.	Tigard, Oregon	Violation: Failed to timely or completely respond to inquiries from the DCBS director.	DCBS Compliance	06-07-014	HealthNet was slow in responding to several inquiries and withheld HR information about a particular employee	Penalty: \$10,000 fine
2006	10/2/2006	United States Life Insurance Company in the City of New York, The	Houston, Texas	Violation: Issued a group health insurance policy to unapproved associations.	Issuing to Unapproved Entity	06-08-004	Failed to file association approval form with DCBS	Penalty: \$20,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2006	10/11/2006	Pan-American Life Insurance Company	Pan-American Life Insurance Company	Violation: Issued a group health insurance policy to unapproved associations.	Issuing to Unapproved Entity	06-06-014	Failed to file association approval form with DCBS	Penalty: \$30,000 fine
2007	2/13/2007	John Alden Life Insurance Company	Milwaukee, Wisconsin	Violation: Failed to apply creditable coverage from prior health insurance policies. Used impermissible information to evaluate the health status of applicants.	Application Processing	05-02-006	At all relevant times, John Alden Life had issued certain health insurance policies to persons residing in Oregon. The policies were based on policy form number 393-OR. The policies covered inter alia a women's annual medical examination without any limitation or reduction due to any annual maximum benefit limit, deductible, copay, or waiting period policy provision. Subsequently, the insureds received the examinations and filed claims therefor. However, from 10/1/00 to 1/26/05, John Alden Life denied, or reduced the amount paid for, 71 of the claims by applying an annual maximum benefit limit, deductible, copay, or waiting period policy provision. From 2/17/02 to 5/14/04, John Alden Life requested and received from an affiliated carrier, Fortis Insurance Company, the claims history of 23 applicants for coverage in an individual health benefit plan to be provided by John Alden Life. John Alden Life used the information to determine whether to replace or upgrade each applicant's coverage.	Penalty: \$10,000 fine
2007	2/13/2007	Time Insurance Company (Formerly known as Fortis Insurance Company)	Milwaukee, Wisconsin	Violation: Failed to apply creditable coverage from prior health insurance policies. Refused to pay claims without conducting a reasonable investigation. Used impermissible information to evaluate the health status of applicants. Issued policies using an unapproved form. Failed to timely notify claimants that it needed more time to accept or deny claims.	Application Processing	04-04-011	At all relevant times, Time had issued to each of certain persons who resided in Oregon a health insurance policy that covered maternity health care services. ... the insureds received maternity health care services. The services were received after the exclusion period as reduced or eliminated by the prior creditable coverage. Subsequently, the insureds filed claims for the services. However, from 1/1/00 to 7/6/05, Time denied 693 of the claims because Time did not eliminate or reduce the exclusion period by the prior creditable coverage	Penalty: \$60,000 fine
2007	4/30/2007	ACE American Insurance Company	Philadelphia, Pennsylvania	Violation: Issued a group health insurance policy to unapproved associations.	Issuing to Unapproved Entity	07-02-010	Failed to file association approval form with DCBS	Penalty: \$15,000 fine
2007	4/30/2007	Stonebridge Life Insurance Company	Plano, Texas	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	07-03-012	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2007	5/21/2007	Guarantee Trust Life Insurance Company	Glenview, Illinois	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	07-04-005	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2007	5/30/2007	Presidential Life Insurance Company	Dallas, Texas	Violation: Issued a group health insurance policy to unapproved associations.	Issuing to Unapproved Entity	07-01-004	Failed to file association approval form with DCBS	Penalty: \$15,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2007	8/23/2007	United Healthcare Insurance Company	Hartford, Connecticut	Violation: United Healthcare Insurance Company and 25 of its subsidiaries and affiliates entered into a regulatory settlement agreement (RSA) to resolve "areas of concern" identified in a multi-state analysis of the companies. Areas of concern included claims processing; coordination of benefits; complaints, grievances, and appeals; responses to regulatory and consumer inquiries; and oversight of contracted entities.	Claim / Appeal Processing	07-08-001	Multi-state agreement. See notes.	Penalty: Among provisions of the RSA, the companies agreed to pay up to a \$20 million fine, make corrective actions, and pay any claims that should have been paid. Oregon's share of the fine is estimated to be \$42,346.03.
2007	9/20/2007	PacifiCare of Oregon, Inc.	Lake Oswego, Oregon	Violation: Denied claims without conducting a reasonable investigation. Failed to acknowledge and act promptly on claim communications. Failed to timely respond to an inquiry from the DCBS director.	Claim / Appeal Processing	07-08-002	From 6/1/04 to 5/4/07, PacifiCare denied 8 40 claims. The claims indicated that they were for medical services classified under code 257.2 of the International Classification of Diseases, Ninth Revision, Clinical Modification (ICD-9-CM). This code includes various services. PacifiCare insured some of the services but not others. PacifiCare denied the claims without investigating whether the claim was for a service that PacifiCare insured. On 10/24/06, a claimant mailed to PacifiCare, at its office in Cypress, California, a letter dated 10/24/06 requesting certain information relating to the claimant's claims. PacifiCare received the letter but did not respond. On 12/20/06, the claimant faxed a copy of the letter to PacifiCare. PacifiCare received the letter but did not respond. On 5/11/07, the Insurance Division informed PacifiCare that it had not responded to the claimant. On 6/8/07, PacifiCare sent a letter to the claimant providing the information requested.	Penalty: \$34,000 fine
2007	10/12/2007	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Portland, Oregon	Violation: Failed to timely pay or deny clean health insurance claims.	Claim / Appeal Processing	07-08-019	At all relevant times, Kaiser had issued group health benefit plans insuring persons who resided in Oregon, and received clean claims from providers on behalf of insureds. From 6/1/05 to 10/31/06, Kaiser paid 120,519 clean claims more than 30 days after receiving them.	Penalty: \$10,000 fine
2007	11/8/2007	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Portland, Oregon	Violation: Evaluated the health status of applicants for group health insurance.	Application Processing	07-09-002	Kaiser Permanente is subject to enforcement action pursuant to ORS 743.734(4) and ORS 743.751 by using a health statement when it offered a health benefit plan to employers in Oregon in 263 in stances from 12/1/02 to 8/12/05.	Penalty: \$10,000 fine
2007	11/13/2007	Reliance Standard Life Insurance Company	Philadelphia, Pennsylvania	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	07-10-014	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2007	12/26/2007	Presidential Life Insurance Company	Nyak, New York	Violation: Issued a group health insurance policy to an unapproved association.	Issuing to Unapproved Entity	07-11-005	Failed to file association approval form with DCBS	Penalty: \$5,000 fine
2008	3/5/2008	Virginia Surety Company, Inc.	Glenview, Illinois	Violation: Issued group health insurance policies to unapproved groups.	Issuing to Unapproved Entity	06-06-011	Failed to file association approval form with DCBS	Penalty: \$25,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2008	8/8/2008	The MEGA Life and Health Insurance Company, Mid-West National Life Insurance Company of Tennessee, and The Chesapeake Life Insurance Company (collectively referred to as HealthMarkets Companies)	North Richland Hills, Texas	Violation: Insurance regulators from 35 states and the District of Columbia, through the National Association of Insurance Commissioners, alleged the companies had numerous deficiencies including oversight, communication, monitoring, and training of agents; processing and handling of claims made by policyholders; disclosure of relationships with membership associations and affiliated companies to consumers and policyholders; handling of policyholder complaints and grievances; and adherence to a compliance plan. The companies entered into a regulatory settlement agreement (RSA) dated May 29, 2008, with the participating state insurance regulators.	DCBS Compliance	08-07-009	Health insurance agent training and oversight	Penalty: The companies agreed to a \$20 million penalty to be distributed among the participating jurisdictions, implement outreach program for policyholders, and report progress on performance standards. The companies must submit to a follow-up market conduction examination.
2008	8/25/2008	Providence Health Plan	Beaverton, Oregon	Violation: Failed to timely respond to DCBS director's inquiry.	DCBS Compliance	08-06-009	At an relevant times, a particular person who resided in Oregon was insured under a group health insurance policy issued by Providence. On 6/20/07, the person filed with the Insurance Division a complaint about Providence. On 8/9/07, the Insurance Division mailed by first class mail a letter to Providence at its business mailing address of PO Box 4327, Portland, OR 97 208-4327. The letter requested Providence provide certain information about the complaint, as well as certain information about Providence' claims for mental health and chemical dependency benefits required by ORS 743.556 and OAR 836-053-1404 et seq (hereinafter referred to as the claims information). The Insurance Division requested a response by 9/7/07. On 8/14/07, Providence received the letter. On 9/7/07, the Insurance Division received from Providence a letter dated 9/5/07 but it did not provide the claims information. On 9/12/07, the Insurance Division mailed by first class a follow up letter to Providence again requesting the claims information. On 9/14/07, Providence received the follow up letter. On 10/9/07, the Insurance Division received from Providence a letter dated 10/9/07 but it did not provide the claims information. On 11/15/07, the Insurance Division mailed by first class another follow up letter to Providence again requesting the claims information. On 11/20/07, Providence received the follow up letter. On or about 12/7/07, the Insurance Division received from Providence a letter dated 12/7/07 but it did not provide the claims information. On 12/10/07, the Insurance Division sent by e-mail another follow up letter to Providence again requesting the claims information. On 12/10/07, Providence received the follow up letter. On or about 1/7/08, 122 days late, the Insurance Division received from Providence a letter dated 1/7/08 which	Penalty: \$2,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2008	12/17/2008	PacificSource Health Plans	Springfield, Oregon	Violation: Failed to notify claimants that it needed additional time to investigate claims	Claim / Appeal Processing	08-11-002	From 6/16/07 to 12/4/07, PacificSource received proofs of loss from insureds, and needed more time to investigate the claims, but failed to initially notify the insureds in an estimated 57,910 instances, and failed to subsequently notify the insureds in an estimated 10,547 instances, why PacificSource needed more time to investigate the claims.	Penalty: \$20,000 fine
2008	12/30/2008	PacifiCare Life Assurance Company	Cypress, California	Violation: Failed to pay claim without conducting a reasonable investigation, failed to limit pre-existing conditions provision in health benefit plan to six months, and failed to acknowledge and act promptly on a claim.	Claim / Appeal Processing	08-11-003	From 9/29/05 to 7/10/07, PacifiCare Life denied 16,955 claims for health care services, which PacifiCare Life presumed were not covered, without contacting the claimant or health care provider to verify whether the services were not covered. Subsequently, after the Insurance Division began an investigation, PacifiCare Life took corrective action, reviewed the claims, determined that 4,928 claims should have been paid rather than denied, and paid the claims plus interest. From 9/29/05 to 7/10/07, PacifiCare Life applied to 2,891 claims a preexisting conditions provision for more than six months after an enrollee's effective date of coverage. Subsequently, after the Insurance Division began an investigation, PacifiCare Life took corrective action, reviewed the claims, determined that 2,024 the claims should have been paid rather than denied, and paid additional benefits plus interest. At all relevant times, a particular person who resided in Oregon was insured under a group health insurance policy issued by PacifiCare Life. On 3/23/06, the person faxed to PacifiCare Life, at its Cypress, California office, a first party claim for non-emergency medical services. On 3/27/06, the claimant called PacifiCare Life and was told that PacifiCare Life received the claim. On four occasions between 3/31/06 and 5/4/06, the claimant called PacifiCare Life and was told each time that PacifiCare Life did not have any record of the claim. So on 5/4/06, the claimant faxed a copy of the claim to PacifiCare Life. On 5/17/06 and 8/2/06, the claimant called PacifiCare Life and was told that PacifiCare Life did not have any record of the claim. So on 8/8/06, the claimant mailed by certified mail another copy of the claim to PacifiCare Life. On 8/23/06 and 9/14/06, the claimant called	Penalty: \$46,000
2009	1/26/2009	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Portland, Oregon	Violation: Failed to promptly provide proper explanation for claim denials	Claim / Appeal Processing	08-12-010	Kaiser Permanente did not intend to provide bariatric health care to persons insured under its health benefit plans issued to small employers in 2006, but failed to expressly exclude such care in the Explanation of Coverage (EOC) provided to the employers. However, on 6/1/06, 3/6/07 and 4/3/07, Kaiser Permanente informed three insureds that their requests for bariatric health care were denied because the care was excluded under the insureds' health care benefit plans. This explanation was incorrect. Subsequently, in December 2007, after the director investigated the denials, Kaiser Permanente reviewed the denials and determined that it was medically necessary for one of three insureds to receive the care.	Penalty: \$9,000
2009	1/26/2009	National Union Fire Insurance Company of Pittsburgh, PA	New York, New York	Violation: Issued group health insurance policies to unapproved associations	Issuing to Unapproved Entity	08-12-005	Failed to file association approval form with DCBS	Penalty: \$65,000

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2009	1/30/2009	Virginia Surety Company, Inc	Glenville, Illinois	Violation: Issued group health insurance policy to unapproved group	Issuing to Unapproved Entity	08-12-009	Failed to file association approval form with DCBS	Penalty: \$10,000
2009	6/17/2009	Regence BlueCross BlueShield of Oregon	Portland, Oregon	Violation: Failed to promptly respond to an inquiry from the Department of Consumer and Business Services director.	DCBS Compliance	09-05-003	On 8/21/07, the Insurance Division, on behalf of the director, sent a letter to Regence requesting certain information by 9/18/07. On 2/11/08, when Regence did not respond by the due date, the Insurance Division sent a follow up e - mail to Regence again requesting the information. On 2/19/08, 154 days late, the Insurance Division received from Regence an e - mail providing the information. On 3/28/08, the Insurance Division, on behalf of the director, sent a letter to Regence requesting certain information by 4/28/08. On 5/22/08, 24 days late, the Insurance Division received from Regence an e - mail providing the information. On 9/15/08, the Insurance Division, on behalf of the director, sent a letter to Regence requesting certain information by 10/13/08. On 12/8/08, when Regence did not respond by the due date, the Insurance Division sent a follow up e - mail to Regence again requesting the information. On 1/5/09, 84 days late, the Insurance Division received from Regence an e - mail providing the information.	Penalty: \$5,000
2009	10/29/2009	Providence Health Plan	Portland, Oregon	Violation: Failed to pay more than 6,800 claims without conducting a reasonable investigation.	Claim / Appeal Processing	09-09-005	From 7/1/06 to 8/20/08 ... Providence denied 6,843 claims that were to be sent to a claims administrator, and returned them to the claimants. ... Providence informed all of the claimants that the claims were not covered, which was not necessarily correct, but nevertheless instructed the claimants to send their claims to a claims administrator, which also was not necessarily correct. Although Providence believed that this procedure would cause the claims to be processed more quickly, this procedure had the effect of confusing claimants about whether the claims were payable and who the claims should be sent to, shifting Providence's responsibility for investigating the claims to the claimants, delaying processing claims which were eventually resent, and not paying claims which were not resent.	Penalty: \$30,000
2010	12/20/2010	UnitedHealthcare Insurance Company	Hartford, Connecticut	Violation: Sent multiple appeal decisions to members over a nearly three-year period that failed to inform them of the opportunity to file a complaint with DCBS; failed to notify members that additional time was needed to accept or deny claims	Claim / Appeal Processing	10-10-008	From 8/1/06 to 6/19/09, in 138 instances, UnitedHealthcare sent to a n enrollee a written appeal decision that did not inform the enrollee that the enrollee could file a complaint with the director. From 8/1/06 to 10/2/09, in 758 instances, UnitedHealthcare received from an insured a claim for health insurance benefits, needed more time to investigate the claim, and sent to the insured within 30 days an initial notice requesting information, but failed to send every 45 days thereafter an additional notice explaining that UnitedHealthcare did not receive but needed the information .	Penalty: \$20,000

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2011	5/10/2011	Providence Health Plan	Beaverton, Oregon	Violation: Failed to notify insured and provider of additional information needed to process claims	Claim / Appeal Processing	11-03-019	From 4/1/08 to 1/31/11, Providence received 9,814 claims , for benefits under health benefit plans issued by Providence to or covering persons residing in Oregon , and required additional information before deciding whether to pay or deny the claims. Providence sent a written notice to the enrollee in all of the claims and to the provider in almost all of the claims . However, the notices that were sent did not explain what additional information was required, although Providence typically called and explained to the enrollee or provider what additional information was required.	Penalty: \$20,000
2011	5/24/2011	Regence BlueCross BlueShield of Oregon	Portland, Oregon	Violation: The company failed to reimburse applicants the full costs of medical information requested by the company in evaluating applicants' Oregon Standard Health Statement.	Application Processing	11-03-004	From 10/1/07 to 10/1/10, in 252 instances, Regence requested an applicant provide to Regence additional medical information for the purpose of evaluating the Oregon Standard Health Statement submitted by the applicant but reimbursed the applicant less than what the applicant paid for the information.	Penalty: \$10,000
2011	5/24/2011	The Mega Life and Health Insurance Company	North Richland Hills, Texas	Violation: Refused to pay claims without conducting reasonable investigations	Chapter 743A Health Mandates	11-03-001	ORS 743A.104 - Pelvic and ORS 743A.108 - Breast the policy provided to benefits for women's Pap smear and breast examinations as required by ORS 743A.104 and ORS 743A.108 respectively. From 10/1/06 to 10/1/09, MEGA received 97 claims for Pap smears and 780 claims for breast examinations of women who resided in Oregon and were insured under the policy. MEGA denied the 877 claims because they were excluded under the routine physical examination exclusion provision of the policy. However, MEGA failed to initially determine that the claims were payable under the Pap smear and breast examination benefit provisions of the policy. Subsequently, MEGA took remedial action by reimbursing or otherwise compensating claimants whose claims were denied improperly.	Penalty: \$40,000
2011	7/11/2011	Brokers National Life Assurance Company	Austin, Texas	Violation: Issued a group health insurance policy to an unapproved association	Issuing to Unapproved Entity	11-03-007	Failed to file association approval form with DCBS	Penalty: \$15,000
2011	7/11/2011	PacificCare of Oregon, Inc.	Cypress, California	Violation: Issued a group health insurance policy to unapproved trust.	Issuing to Unapproved Entity	11-03-010	Failed to file association approval form with DCBS	Penalty: \$10,000
2011	7/11/2011	Pan-American Life Insurance Company	New Orleans, Louisiana	Violation: Issued a group health insurance policy to unapproved association	Issuing to Unapproved Entity	11-03-011	Failed to file association approval form with DCBS	Penalty: \$5,000
2011	7/11/2011	Providence Health Plan	Beaverton, Oregon	Violation: Issued a group health insurance policy to unapproved trust	Issuing to Unapproved Entity	11-03-012	Failed to file association approval form with DCBS	Penalty: \$10,000
2011	7/11/2011	Standard Insurance Company	Portland, Oregon	Violation: Issued a group health insurance policy to unapproved trust	Issuing to Unapproved Entity	11-03-013	Failed to file association approval form with DCBS	Penalty: \$15,000
2011	7/11/2011	Symetra Life Insurance Company	Seattle, Washington	Violation: Issued stop loss policy to unapproved trust	Issuing to Unapproved Entity	11-03-015	Before it offered each policy, Symetra Life did not file with the director information about the trust pursuant to ORS 743.526(3) and therefore the director did not determine that the trust satisfied the applicable requirements.	Penalty: \$10,000
2011	7/11/2011	The Union Labor Life Insurance Company	Washington, D.C.	Violation: Issued group life insurance policy to unapproved trust; issued group health insurance policy to unapproved trust	Issuing to Unapproved Entity	11-03-016	Failed to file association approval form with DCBS	Penalty: \$10,000
2011	7/11/2011	UnitedHealthcare Insurance Company	Hartford, Connecticut	Violation: Issued group health insurance policy to unapproved trust	Issuing to Unapproved Entity	11-03-018	Failed to file association approval form with DCBS	Penalty: \$5,000

Oregon Insurance Division Marketplace Enforcement Actions (Health Insurance) 1998-2016

Year	Date:	Name:	Location:	Violation:	Vio Type:	Case #	Comments:	Penalty:
2011	8/11/2011	Health Net Health Plan of Oregon	Tigard, Oregon	Violation: Health Net misrepresented to claimants seeking chemical dependency or mental health services under group health insurance policies that the policies required prior authorization before receiving the services.	Chapter 743A Health Mandates	10-10-006	ORS 743A.168 - MHP Health Net misrepresented to claimants, in the course of denying 123 claims for chemical dependency or mental health services from 1/1/08 to 6/19/09 under group health insurance policies, that the policies required the claimant to receive prior authorization before receiving the services.	Penalty: \$5,000
2011	10/25/2011	UnitedHealthcare Insurance Company	Hartford, Connecticut	Violation: Failed to notify members that company needed additional information to process claims	Claim / Appeal Processing	11-09-001	From 1/1/08 to 7/18/11, UnitedHealthcare received 7,434 claims , for benefits under health benefit plans issued by UnitedHealthcare to or covering persons residing in Oregon , but needed additional information to process the claims. UnitedHealthcare sent letters to the providers, but not to the enrollees, requesting the additional information.	Penalty: \$20,000
2012	11/16/2012	Chartis, Inc., and others	Pittsburgh, Pennsylvania	Violation: Multistate examination found a variety of operations problems including failure to supervise the sale of certain limited benefit health plans through banks and other vendors; failure to properly file forms and rates with state regulatory agencies; and failure to implement internal controls of agent licensing, claims and consumer complaints.	DCBS Compliance	12-10-003	issues related to the conduct of the Company's Accident and Health Insurance business, including Rate and Form Filing, Policy Fulfillment, Producer licensing and appointment, and Vendor management.	Penalty: Company agrees to pay minimum nationwide fine of \$39 million; Oregon's share of the fine is \$539,546
2014	8/7/2014	Time Insurance Company	Milwaukee, Wisconsin	Violation: Failed to make a decision on internal appeals within 30 days.	Claim / Appeal Processing	13-08-007	OAR 836-053-1100(1)(b) -- didn't make appeal decisions in 30 days	Penalty: \$40,000

Section 3: Marketplace Enforcement Actions against All Insurers

- Includes summary of data for all lines of insurance, with date, insurance type (line), violation, and penalty

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
1998	7/21/1998	Polaris Insurance Company Ltd.	Unlicensed	San Jose, Costa Rica	Violation: Transacted insurance in Oregon without an Oregon certificate of authority	Penalty: Cease and desist order
1998	8/27/1998	PFL Life Insurance Company	Life	Cedar Rapids, IA	Violation: Unintentionally failed to respond promptly to an inquiry from the Director.	Penalty: \$2,000 fine.
1998	12/17/1998	American Bankers Insurance Group, Inc.	Homeowner	Miami, FL	Violation: Multiple unspecified marketing practices	Penalty: \$197,594 fine in Oregon, \$12 million total fine for all involved.
1999	1/6/1999	Chicago Title Insurance Company of Oregon	Title	Portland, OR	Violation: Failed to respond promptly to an inquiry from the Director.	Penalty: \$2,000 fine.
1999	2/16/1999	Providence Health Plan	Health	Portland, OR	Violation: Failed to respond promptly to two inquiries from the Director.	Penalty: \$2,000 fine.
1999	3/4/1999	PacifiCare of Oregon, Inc.	Health	Lake Oswego, OR	Violation: Failed to comply with state standards for the handling of health insurance claims.	Penalty: \$50,000 fine.
1999	6/18/1999	Providentmutual Life and Annuity Company of America	Life	Berwyn, PA	Violation: Failed to timely notify insurers regarding replacement of life insurance policies or annuities.	Penalty: \$10,000 fine.
1999	7/19/1999	New York Life Insurance Company	Life	New York, NY	Violation: Failed to terminate agents with at least 90 days written notice prior to the effective date of the termination.	Penalty: \$14,000 fine.
1999	8/2/1999	Fortis Insurance Company - Time	Health	Milwaukee, WI	Violation: Incorrect premiums were charged. Responded 49 days late to an Insurance Division request.	Penalty: \$12,000 fine.
1999	9/30/1999	GuideOne Specialty Mutual Insurance Company	Auto	West Des Moines, IA	Violation: Issued an auto liability policy that provided uninsured motorist coverage limits lower than bodily injury liability coverage limits without having the insured sign and date a statement electing the lower coverage limits.	Penalty: \$1,000 fine.
1999	12/7/1999	Monumental Life Insurance Company	Life	Baltimore, MD	Violation: Issued travel insurance on policy forms that were not approved.	Penalty: \$20,000 fine.
1999	12/21/1999	HomeSure of Utah, Inc.	Unlicensed	Ft. Lauderdale, FL	Violation: Transacted insurance in Oregon without a certificate of authority.	Penalty: \$20,000 fine.
1999	12/21/1999	United Pacific Insurance Company	Worker Comp	Philadelphia, PA	Violation: Failed to include a notice of appeal rights in a workers' compensation insurance final premium audit billing.	Penalty: \$5,000 fine.
2000	3/6/2000	SAFECO Insurance Company of Illinois	Auto	Seattle, WA	Violation: Failed to reply within 30 days after receiving a communication from a claimant.	Penalty: \$2,000 fine.

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2000	3/14/2000	Nationwide Mutual Insurance Company	Auto	Columbus, OH	Violation: Failed to obtain a driver exclusion statement from an insured. Refused to provide a premium quote because of driving record information more than three years old.	Penalty: \$10,000 fine.
2000	5/31/2000	Country Mutual Insurance Company	Homeowner	Bloomington, IL	Violation: Issued policies using unapproved rates.	Penalty: \$20,000 fine.
2000	6/8/2000	Fortis Benefits Insurance Company	Long-Term Care	St. Paul , MN	Violation: Failed to advise a claimant of acceptance or denial of a claim within 30 days of receiving proof of loss. Failed to acknowledge and act promptly on a claim communication. Refused to pay a claim without conducting a reasonable investigation.	Penalty: \$20,000 fine.
2000	7/20/2000	American General Life and Accident Insurance Co.	Life	Houston, TX	Violation: Used racially discriminatory practices in the sale of industrial life and low value life insurance policies.	Penalty: \$900 fine
2000	7/20/2000	Dairyland Insurance Co.	Auto	Stevens Point, WI	Violation: Failed to base an auto insurance total loss settlement offer on the local market area.	Penalty: \$2,000 fine
2000	7/20/2000	State Accident Insurance Fund Corp. (SAIF)	Worker Comp	Salem, OR	Violation: Engaged in certain unfair trade practices, including making misleading statements about a competitor.	Penalty: SAIF agreed to cease and desist from engaging in such unfair trade practices. SAIF will sponsor before June 2001 a seminar on workers' compensation insurance unfair trade practices open to Oregon licensed general insurance agents.
2000	7/26/2000	American Family Mutual Insurance Co.	Homeowner	Madison, WI	Violation: Terminated agents without giving at least 90 days written notice.	Penalty: \$2,000 fine
2001	1/25/2001	GuideOne Specialty Mutual Insurance Company	Property & Casualty	West Des Moines, Iowa	Violation: Failed to respond promptly to an inquiry from the Director.	Penalty: \$2,000 fine.
2001	2/2/2001	Farmers Insurance Group of Oregon	Auto	Tigard, Oregon	Violation: Terminated an agent by giving at least 90 days written notice but not specifying the reason for the termination in the notice.	Penalty: \$1,000 fine.
2001	3/7/2001	QualMed Oregon Health Plan, Inc.	Health	Clackamas, Oregon	Violation: Failed to comply with state standards for handling of health insurance claims.	Penalty: \$50,000 fine.
2001	4/13/2001	Pioneer Life Insurance Company	Life	Carmel, Indiana	Violation: Failure to promptly respond to the Director.	Penalty: \$2,000 fine.
2001	6/28/2001	John Hancock Life Insurance Company	Life	Boston, Massachussetts	Violation: Failure to notify existing insurer of replacement of long term care policy.	Penalty: \$3,000 fine.

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2001	8/2/2001	Equitable Life Assurance Society of the United States	Life	New York, New York	Violation: Terminated agents without giving at least 90 days written notice.	Penalty: \$3,500 fine.
2002	1/11/2002	Puget's Sound Agricultural Society, Ltd.	Unlicensed	Georgetown, CA	Violation: Transacted insurance as an insurer without a certificate of authority.	Penalty: Cease and desist
2002	1/18/2002	ServicePlan, Inc.	Unlicensed	Glenview, Illinois	Violation: Transacted insurance as an insurer in Oregon without a license.	Penalty: Cease and Desist
2002	1/22/2002	Equitable Life and Casualty Insurance Company	Life	Salt Lake City, Utah	Violation: Failed to notify other insurers regarding replacement of existing long-term care policies.	Penalty: \$25,000 fine
2002	2/4/2002	Fortis Insurance Company	Health	Milwaukee, Wisconsin	Violation: Used impermissible information to evaluate an applicant's health status. Refused to pay a claim without conducting a reasonable investigation. Issued health insurance policies without providing maternity coverage. Failed to promptly respond to the DCBS director.	Penalty: \$42,000 fine
2002	2/6/2002	Puget's Sound Agricultural Society, Ltd.	Unlicensed	Georgetown, CA	Violation: Transacted insurance as an insurer without a certificate of authority.	Penalty: \$10,000 fine
2002	2/28/2002	Prudential Property and Casualty Insurance Company	Homeowner	Holmdel, NJ	Violation: Used driving record information more than three years old.	Penalty: \$5,000 fine
2002	3/12/2002	GuideOne Specialty Mutual Insurance Company	Auto	West Des Moines, Iowa	Violation: Failed to promptly settle a claim. Failed to record pertinent information about a claim. Failed to promptly communicate with a claimant about a claim.	Penalty: \$10,000 fine
2002	3/26/2002	Life Wise, A Premera Health Plan, Inc.	Health	Portland, Oregon	Violation: Failed to promptly provide an insured with the proper explanation of the basis used to deny a claim.	Penalty: \$5,000 fine
2002	5/10/2002	Life Insurance Company of Georgia and Southland Life Insurance Company	Life		Violation: Allegedly unfair underwriting and pricing practices, including use of race-based premiums	Penalty: The companies were fined \$4 million in February 2002 following a multi-state market conduct examination. The fine was allocated to each participating state based on the percentage of the total affected policies issued to the state's residents. Of the approximately 2.5 million affected policies, only 18 were issued to Oregon residents. As a result, the minimum fine of \$1,000 was allocated to Oregon.

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2002	6/11/2002	Union National Life Insurance Company, United Insurance Company of America, and The Reliable Life Insurance Company	Life		Violation: Allegedly unfair underwriting and pricing practices, including use of race-based premiums.	Penalty: The companies were fined \$1.25 million in May 2002 following a multi-state market conduct examination. The fine was allocated to each participating state based on the percentage of the total affected policies issued to the state's residents. Of the 391,538 affected policies, only 18 were issued to Oregon residents. As a result, the minimum fine of \$1,055 was allocated to Oregon.
2002	6/27/2002	Great American Life Insurance company	Life	Cincinnati, OH	Violation: Failed to maintain evidence of policy summaries in life insurance replacement transactions. Failed to timely send a policy summary to replaced insurer in life insurance replacement transactions.	Penalty: \$10,000 fine
2002	7/1/2002	IGF Insurance Company	Auto	Des Moines, IA	Violation: Failed to timely complete an investigation of a claim. Failed to promptly settle a claim. Failed to promptly acknowledge a claim communication. Failed to promptly provide necessary claim forms. Failed to timely notify a claimant of continuation of investigation of his claim. Failed to promptly pay Personal Injury Protection benefits.	Penalty: \$10,000 fine
2002	7/1/2002	ServicePlan, Inc.	Unlicensed	Glenview, Illinois	Violation: Transacted insurance in Oregon without a certificate of authority.	Penalty: \$50,000 fine
2002	7/1/2002	Western Grocers Employee Benefits Trust	Health	Portland, Oregon	Violation: Failed to comply with market conduct examination recommendations.	Penalty: \$5,000 fine
2002	7/22/2002	Star Insurance Company	Other	Southfield, Michigan	Violation: Failed to promptly pay bond claims.	Penalty: \$21,000 fine
2002	8/22/2002	American Bankers Insurance Company of Florida	Homeowner	Miami, Florida	Violation: Authorized unlicensed persons to transact insurance. Failed to enter into written contracts with appointed agents. Failed to notify the DCBS director of an agent appointment.	Penalty: \$30,000 fine
2002	10/1/2002	AIU Insurance Company	Auto	New York, New York	Violation: Failed to implement reasonable claim investigation standards. Failed to promptly acknowledge or act on claim communications.	Penalty: \$10,000 fine
2002	10/18/2002	North American Marine General Insurance Company, Ltd.	Unlicensed	Panama City, Panama	Violation: Transacted insurance in Oregon as an unauthorized insurer.	Penalty: Ordered to cease and desist from violating the Oregon Insurance Code
2002	10/21/2002	Jackson National Life Insurance Company	Life	Lansing, Michigan	Violation: Terminated agents without 90 days notice.	Penalty: \$10,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2002	10/29/2002	National Health Insurance Company	Health	Dallas, Texas	Violation: Failed to conduct a reasonable investigation of claims.	Penalty: \$15,000 fine
2002	11/5/2002	Metropolitan Life Insurance Company	Life	Tampa, Florida	Violation: Allegedly used racially discriminatory practices in the sale of life insurance policies.	Penalty: The New York Insurance Department, on behalf of other state insurance regulators, entered into a Regulatory Settlement Agreement with MetLife on August 29, 2002. The agreement requires MetLife to pay certain benefits to all those whose policies currently are in force, those whose policies have terminated by death within the past seven years, and those whose policies have otherwise terminated since January 1989. The total number of affected policies is estimated to be as many as 1.8 million, of which approximately 4,651 are issued to Oregon residents. The total settlement benefits paid for all affected policies is estimated to be as high as \$160 million, of which approximately \$374,851 is expected to be paid to Oregon policyholders. The minimum benefit with respect to any policy is \$10.
2002	11/8/2002	Globe Life and Accident Insurance Company	Life	Oklahoma City, Oklahoma	Violation: Failed to timely pay interest on life insurance death benefits.	Penalty: \$5,000 fine
2002	11/18/2002	Ohio National Life Insurance Company (The)	Life	Cincinnati, OH	Violation: Terminated agent appointments without sufficient notice.	Penalty: \$10,000 fine
2002	11/25/2002	Kelco, Inc.	Life	Lexington, Kentucky	Violation: The Kentucky Insurance Commissioner suspended Kelco's resident life settlement provider license after Kelco was indicted by a federal grand jury on allegations of mail fraud, wire fraud, money laundering and conspiracy to commit money laundering.	Penalty: Oregon life settlement provider and broker licenses suspended
2003	3/18/2003	First Actual American Insurance Company	Unlicensed	Canby, Oregon	Violation: Transacted insurance in Oregon as an unauthorized insurer.	Penalty: Ordered to cease and desist from violating the Oregon Insurance Code

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2003	6/10/2003	AmeriFirst Foundation, Inc.	Annuity	Mesa, Arizona	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: Ordered to cease and desist from issuing charitable gift annuities in Oregon without a license.
2003	6/10/2003	OTR Truckers Association, Inc., OTR Truckers Health and Welfare Fund, M & M Underwriting, Inc.	Unlicensed	Cumming, Georgia	Violation: Transacted insurance in Oregon without a license.	Penalty: Ordered to cease and desist from transacting insurance in Oregon without a license.
2003	7/3/2003	Minnesota Life Insurance Company	Life	St. Paul Minnesota	Violation: Terminated agents without sufficient notice.	Penalty: \$2,500 fine
2003	7/14/2003	American Family Mutual Insurance Company	Health	Madison, Wisconsin	Violation: Used unauthorized methods to determine the health status of applicants.	Penalty: \$10,000 fine
2003	7/16/2003	Mutual Protective Insurance Company	Other	Omaha, Nebraska	Violation: Terminated agents without sufficient notice.	Penalty: \$1,500 fine
2003	7/24/2003	Voice of Prophecy	Unlicensed	Simi Valley, California	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2003	7/25/2003	Earthjustice	Annuity	Oakland, California	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$900 fine
2003	7/30/2003	XL Reinsurance America, Inc.	Worker Comp	Stamford, Connecticut	Violation: Failed to increase its special workers' compensation deposit by the due date.	Penalty: \$1,000 fine
2003	8/1/2003	Samaritan's Purse	Annuity	Boone, North Carolina	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$70 fine
2003	8/11/2003	Monumental Life Insurance Company	Life	Baltimore, Maryland	Violation: A multi-state market conduct examination confirmed that some companies or blocks of business acquired by Monumental Life had used race to price life insurance policies.	Penalty: Monumental Life agreed to comply with terms and conditions of the regulatory settlement agreement.
2003	8/12/2003	Chapman University	Annuity	Orange, California	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2003	9/17/2003	Great Western Insurance Company	Other	Odgen, Utah	Violation: Terminated agents without sufficient notice.	Penalty: \$1,300 fine
2003	9/26/2003	Assemblies of God Foundation	Annuity	Springfield, Missouri	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2003	10/1/2003	Southland Life Insurance Company	Life	Atlanta, Georgia	Violation: A four-state collaborative targeted market conduct exam of Southland's individual ordinary life insurance business found alleged deficiencies in the following areas: noncompliance with life illustration and life replacement laws, untimely response to claim correspondence, and inadequate documentation of death claim files. Southland did not admit or deny any of the deficiencies.	Penalty: Southland agreed to revise its policies, procedures, and controls to ensure compliance with laws of the four states.

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2003	10/8/2003	Terra Nova Insurance Company, Ltd.	Unlicensed	London, England	Violation: Transacted insurance in Oregon without a certificate of authority.	Penalty: \$5,000 fine. Terra Nova also will pay surplus lines taxes of \$304.18.
2003	10/16/2003	Ocean Conservancy, Inc. (The)	Annuity	Washington, D.C.	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2003	10/24/2003	ODS Health Plan, Inc.	Health	Portland, Oregon	Violation: Failed to comply with recommendations from market conduct examinations.	Penalty: \$17,500 fine. An additional \$20,000 fine will be imposed if a follow-up examination shows ODS hasn't complied with recommendations from earlier exams.
2003	10/27/2003	Conseco Life Insurance Company	Life	Carmel, Indiana	Violation: Terminated agents without sufficient notice.	Penalty: \$8,300 fine
2003	10/27/2003	National Health Insurance Company	Health	Dallas, Texas	Violation: Terminated agents without sufficient notice.	Penalty: \$3,800 fine
2003	11/14/2003	United Home Life Insurance Company	Life	Indianapolis, Indiana	Violation: Made a false or misleading policy form filing to the DCBS director.	Penalty: \$2,000 fine
2003	11/18/2003	United Employers Voluntary Employees Benefit Association	Unlicensed	Little Rock, Arkansas	Violation: Transacted insurance in Oregon without a license.	Penalty: Ordered to cease and desist from transacting insurance in Oregon without a license.
2003	11/25/2003	Beneficial Life Insurance Company	Life	Salt Lake City, Utah	Violation: Terminated agents without sufficient notice.	Penalty: \$3,400 fine
2003	11/25/2003	Fortis Insurance Company	Health	Milwaukee, Wisconsin	Violation: Used unauthorized methods to determine the health status of applicants.	Penalty: \$20,000 fine
2003	12/17/2003	American Memorial Life Insurance Company	Life	Rapid City, South Dakota	Violation: Terminated agents without sufficient notice. Failed to respond to an inquiry from the DCBS director.	Penalty: \$4,700 fine
2003	12/18/2003	Transamerica Life Insurance Company	Life	Cedar Rapids, Iowa	Violation: Terminated agents without sufficient notice.	Penalty: \$4,500 fine
2003	12/23/2003	Cooperative for Assistance and Relief Everywhere, Inc.	Annuity	Atlanta, Georgia	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2003	12/26/2003	Wycliffe Bible Translators, Inc.	Unlicensed	Orlando, Florida	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2004	2/20/2004	United Freight Carriers of North America	Unlicensed	Troutdale, Oregon	Violation: Transacted insurance as an insurer without a license.	Penalty: Ordered to cease and desist from violating the Oregon Insurance Code.
2004	2/27/2004	Navigators (The)	Annuity	Colorado Springs, Colorado	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2004	3/2/2004	Metropolitan Life Insurance Company	Life	Tampa, Florida	Violation: Terminated agents without sufficient notice.	Penalty: \$1,000 fine
2004	3/8/2004	Church of God Ministries, Inc.	Annuity	Anderson, Indiana	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2004	3/29/2004	Combined Insurance Company of America	Other	Glenview, Illinois	Violation: Terminated agents without sufficient notice.	Penalty: \$10,000 fine
2004	5/11/2004	Trans World Radio	Annuity	Cary, North Carolina	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2004	5/26/2004	Scottish Rite Foundation, Southern Jurisdiction, U.S.A., Inc.	Annuity	Washington, D.C.	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2004	7/30/2004	Country Casualty Insurance Company	Auto	Bloomington, Illinois	Violation: Failed to comply with recommendations from market conduct examinations.	Penalty: \$10,000 fine. The fine is suspended and will be withdrawn or reinstated depending on the outcome of a follow-up market conduct exam to determine if Country Casualty has corrected the violations listed in Exhibit A.
2004	7/30/2004	Country Mutual Insurance Company	Auto	Bloomington, Illinois	Violation: Failed to comply with recommendations from market conduct examinations.	Penalty: \$10,000 fine. The fine is suspended and will be withdrawn or reinstated depending on the outcome of a follow-up market conduct exam to determine if Country Mutual has corrected the violations listed in Exhibit A.
2004	8/6/2004	Nations Hazard Insurance Company, Hartford Casualty Insurance, and Michael F. Napadow	Unlicensed	Carpentersville, Illinois	Violation: Transacted insurance in Oregon as an insurer without a license.	Penalty: Ordered to cease and desist from transacting insurance in Oregon without a license.
2004	8/27/2004	American National Insurance Company (ANICO)	Life	Galveston, Texas	Violation: Issued insurance policies with racially-differentiated premiums.	Penalty: The Texas Department of Insurance, on behalf of other state insurance regulators, entered into a Multi-State Regulatory Settlement Agreement with ANICO on June 9, 2004. ANICO agreed to provide certain remedial benefits to former and current policyholders; and to pay fines totaling \$250,000 to the participating states. Oregon received \$2,117.
2004	9/20/2004	World Wildlife Fund, Inc.	Annuity	Washington, D.C.	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2004	10/27/2004	ING Life Insurance and Annuity Company	Annuity	Hartford, Connecticut	Violation: Failed to promptly and equitably settle a claim. Failed to timely respond to a claimant's communication about a claim.	Penalty: \$10,000 fine
2004	12/13/2004	Paul Revere Life Insurance Company (The)	Life	Worcester, Massachusetts	Violation: Following a multistate market conduct examination of their claims handling practices, the companies agreed to reassess certain disability claims going back as far as 1997, and to change their future claims practices.	Penalty: \$15 million fine; Oregon's share was \$120,000. If the companies fail to meet the terms of the agreements, an additional \$145 million fine will be imposed.
2004	12/13/2004	Provident Life and Accident Insurance Company	Life	Chattanooga, Tennessee	Violation: Following a multistate market conduct examination of their claims handling practices, the companies agreed to reassess certain disability claims going back as far as 1997, and to change their future claims practices.	Penalty: \$15 million fine; Oregon's share was \$120,000. If the companies fail to meet the terms of the agreements, an additional \$145 million fine will be imposed.
2004	12/13/2004	Unum Life Insurance Company of America	Life	Portland, Maine	Violation: Following a multistate market conduct examination of their claims handling practices, the companies agreed to reassess certain disability claims going back as far as 1997, and to change their future claims practices.	Penalty: \$15 million fine; Oregon's share was \$120,000. If the companies fail to meet the terms of the agreements, an additional \$145 million fine will be imposed.
2004	12/17/2004	Transamerica Occidental Life Insurance Company	Life	Los Angeles, California	Violation: A collaborative market conduct examination of Transamerica Occidental's ordinary life insurance business found noncompliance with certain provisions of the life illustration laws of the examining states, and inadequate documentation of policy loan files and paid claim files. Ohio was the lead state for the examination, and was assisted by examiners from Illinois, Nebraska and Oregon. Transamerica Occidental entered into a consent order but does not admit or deny any of the deficiencies identified in the examination.	Penalty: Transamerica Occidental will immediately initiate compliance with all terms and conditions of the consent order and follow all recommendations of the examination report as they apply to Oregon.
2005	1/20/2005	Timber Products Manufacturers Trust	Unlicensed	Spokane, Washington	Violation: Transacted insurance as an insurer in Oregon without a license.	Penalty: \$12,400 fine
2005	3/1/2005	Interstate Indemnity Company	Other	Chicago, Illinois	Violation: Terminated an agent without sufficient notice.	Penalty: \$1,000 fine
2005	3/8/2005	American Family Life Assurance Company of Columbus	Life	Columbus, Georgia	Violation: Terminated agents without sufficient notice.	Penalty: \$1,400 fine
2005	3/8/2005	National Jewish Medical and Research Center	Annuity	Denver, Colorado	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2005	4/12/2005	Great-West Life & Annuity Insurance Company	Health	Greenwood Village, Colorado	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Penalty: \$20,000 fine
2005	4/12/2005	PacifiCare Life Assurance Company	Health	Santa Ana, California	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Penalty: \$40,000 fine
2005	5/5/2005	Global Healings Society (The)	Unlicensed	Puyallup, Washington	Violation: Transacted insurance in Oregon as an insurer without a license.	Penalty: Ordered to cease and desist from transacting insurance in Oregon without a license
2005	5/23/2005	Health Net Health Plan of Oregon, Inc.	Health	Tigard, Oregon	Violation: Denied applications for individual health insurance without informing applicants of the existence of the Oregon Medical Insurance Pool (OMIP).	Penalty: \$10,000 fine
2005	5/23/2005	Pacific Hospital Association dba PacificSource Health Plans	Health	Eugene, Oregon	Violation: A follow-up market conduct examination found that PacificSource refused to pay 16 claims without conducting a reasonable investigation.	Penalty: PacificSource was fined \$10,000. However, the fine is suspended until the Insurance Division conducts another follow-up market conduct examination. The fine will be withdrawn if the exam finds that PacificSource complied with ORS 746.230(1)(d) during the period examined, or reinstated if the exam shows the company didn't comply with the statute.
2005	6/27/2005	United of Omaha Life Insurance Company	Health	Omaha, Nebraska	Violation: Failed to provide an explanation of portability rights to employees losing group health insurance coverage.	Penalty: \$25,000 fine
2005	7/5/2005	Farmers Insurance Company of Oregon	Auto	Tigard, Oregon	Violation: A follow-up market conduct examination found that Farmers in 29 instances failed to comply with Oregon law governing uninsured motorist coverage limits for automobile insurance policies.	Penalty: Farmers was fined \$10,000. However, the fine is suspended until the Insurance Division conducts another follow-up market conduct examination. The fine will be withdrawn if the exam finds that Farmers complied with ORS 742.502(2) during the period examined, or reinstated if the exam shows the company didn't comply with the statute.

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2005	7/5/2005	Mid-Century Insurance Company	Auto	Los Angeles, California	Violation: A follow-up market conduct examination found that Mid-Century in 51 instances failed to comply with Oregon law governing uninsured motorist coverage limits for automobile insurance policies.	Penalty: Mid-Century was fined \$10,000. However, the fine is suspended until the Insurance Division conducts another follow-up market conduct examination. The fine will be withdrawn if the exam finds that Mid-Century complied with ORS 742.502(2) during the period examined, or reinstated if the exam shows the company didn't comply with the statute.
2005	7/19/2005	Oberlin College	Annuity	Oberlin, Ohio	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$1,000 fine
2005	7/20/2005	Great American Insurance Company of New York	Other	Cincinnati, Ohio	Violation: Compensated an unlicensed person for transacting insurance in Oregon.	Penalty: \$5,000 fine
2005	8/9/2005	American General Assurance Company	Auto	Schaumburg, Illinois	Violation: Terminated agents without sufficient notice.	Penalty: \$1,800 fine
2005	8/10/2005	Farmers Insurance Company of Oregon	Auto	Tigard, Oregon	Violation: Failed to timely reply to claim communications.	Penalty: \$11,000 fine
2005	8/29/2005	Regence Blue Cross Blue Shield of Oregon	Health	Portland, Oregon	Violation: Failed to timely respond to an inquiry from the DCBS director.	Penalty: \$2,000 fine
2005	8/30/2005	Heritage Foundation (The)	Annuity	Washington, D.C.	Violation: Issued charitable gift annuities in Oregon without a license.	Penalty: \$115 fine
2005	10/12/2005	Progressive Classic Insurance Company	Auto	Mayfield Village, Ohio	Violation: Failed to acknowledge and act promptly on claim communications. Failed to timely respond to an inquiry from the DCBS director.	Penalty: \$8,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2006	1/3/2006	Western and Southern Life Insurance Company, The	Life	Cincinnati, Ohio	Violation: Issued insurance policies with racially-differentiated premiums.	Penalty: The Ohio Department of Insurance, on behalf of other state insurance regulators, entered into a Multi-State Regulatory Settlement Agreement with WSLIC on August 24, 2005. WSLIC agreed to take certain corrective actions; provide to former and current policyholders, and possibly one or more educational institutions or charities that serve African-American causes or interests, certain remedial benefits totaling a minimum of \$2 million; and pay an administrative penalty totaling \$400,000. Oregon's share of the administrative penalty was \$1,000.
2006	1/24/2006	Liberty Life Insurance Company	Life	Greenville, South Carolina	Violation: A target multi-state market conduct examination found that Liberty Life did not pay premium taxes from 1998 to 2002 on complimentary accidental death insurance provided to mortgage loan customers of certain financial institutions in the majority of states in which the insurance was marketed. The company disputed that it was required to pay premium tax on the complimentary premiums, but entered into a regulatory settlement agreement with South Carolina and other participating regulators, including Oregon.	Penalty: Liberty Life agreed to take certain corrective actions and make an administrative payment of up to \$3,075,950 to the participating states, of which \$126,127 was allocated to Oregon.
2006	3/1/2006	Ameritas Life Insurance Corp.	Health	Lincoln, Nebraska	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2006	3/15/2006	Hartford Life and Accident Insurance Company	Health	Simsbury, Connecticut	Violation: Issued group health insurance policies to unapproved associations.	Penalty: \$17,500 fine
2006	3/21/2006	Central United Life Insurance Company	Health	Houston, Texas	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2006	5/22/2006	LifeWise Health Plan of Oregon, Inc.	Health	Portland, Oregon	Violation: Failed to acknowledge and act promptly on claim communications.	Penalty: \$20,000 fine
2006	6/12/2006	Golf Marketing Worldwide, LLC	Unlicensed	Norwalk, Connecticut	Violation: Transacted insurance in Oregon as an insurer without a license.	Penalty: Ordered to immediately cease and desist from transacting insurance in Oregon as an insurer without a license.
2006	6/13/2006	Combined Insurance Company of America	Medicare	Glenview, Illinois	Violation: Failed to annually file Medicare supplement rates.	Penalty: \$9,000 fine
2006	6/13/2006	Pacific Grocers Employee Benefits Trust	Health	Seattle, Washington	Violation: Transacted insurance in Oregon as an insurer without a license. Filed financial documents late.	Penalty: \$16,400 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2006	6/27/2006	Zurich American Insurance Company and its insurance subsidiaries	Other	Schaumburg, Illinois	Violation: Zurich and its subsidiaries allegedly participated in anti-competitive practices relating to contingent compensation. The NAIC Broker Activities Task Force, in coordination with state attorneys general and insurance regulators, negotiated a multi-state regulatory settlement.	Penalty: Zurich agreed to pay \$151.7 million to policyholders nationwide. Oregon policyholders are estimated to receive \$821,339, subject to court approval. Zurich also agreed to pay \$20 million to reimburse certain states for investigative costs; to implement a compliance program; to cease and desist from knowingly giving fictitious quotes, agreeing to rig quotes, or participating in any so called "pay-to-play" schemes; to cooperate with the participating states; and to disclose base and contingent compensation to all commercial insureds.
2006	7/10/2006	Chesapeake Life Insurance Company, The	Health	Richland Hills, Texas	Violation: Issued group health insurance policies to unapproved associations.	Penalty: \$45,000 fine
2006	7/31/2006	Boston Mutual Life Insurance Company	Life	Canton, Massachusetts	Violation: A multi-state market conduct examination by the insurance regulators of Georgia, Massachusetts and Texas found problems with the sale and servicing of whole life policies by Boston Mutual to the military market. While not admitting or denying the findings, Boston Mutual entered into a multi-state regulatory settlement agreement, dated May 28, 2006, with the three states and other state insurance regulators that choose to participate.	Penalty: Boston Mutual agreed to pay remedial benefits to policyholders and take corrective actions.
2006	8/21/2006	American-Amicable Life Insurance Company of Texas, Pioneer American Insurance Company, Pioneer Security Life Insurance Company	Life	Waco, Texas	Violation: Georgia and Texas insurance regulators alleged that the companies violated insurance or consumer protection statutes in the marketing and sale of life insurance policies to members of the military. The companies denied the allegations, but entered into a multi-state regulatory settlement agreement (RSA) dated June 8, 2006 with Georgia, Texas and other state insurance regulators that chose to participate.	Penalty: The companies agreed to pay \$70 million in remedial benefits to policyholders nationwide, cease certain marketing activities, and make periodic reports to regulators.
2006	9/6/2006	Bankers Fidelity Life Insurance Company	Life	Atlanta, Georgia	Violation: Made a false statement to the DCBS director.	Penalty: \$10,000 fine
2006	9/6/2006	Title Insurance Company of Oregon dba First American Title Insurance Company of Oregon	Title	Portland, Oregon	Violation: Gave a thing of value to an intermediary.	Penalty: \$4,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2006	9/11/2006	Chesapeake Life and Health Insurance Company, The	Health	North Richland Hills, Texas	Violation: Terminated agents without sufficient notice.	Penalty: \$2,200 fine
2006	9/27/2006	National Union Fire Insurance Company of Pittsburgh, Pennsylvania	Health	New York, New York	Violation: Issued group health insurance policies to unapproved associations.	Penalty: \$30,000 fine
2006	9/28/2006	AIG Life Insurance Company	Health	Wilmington, Delaware	Violation: Issued group health insurance policies to unapproved associations.	Penalty: \$10,000 fine
2006	10/2/2006	AF&L Insurance Company	Health	Warrington, Pennsylvania	Violation: Issued a group health insurance policy to unapproved association.	Penalty: \$5,000 fine
2006	10/2/2006	Health Net Health Plan of Oregon, Inc.	Health	Tigard, Oregon	Violation: Failed to timely or completely respond to inquiries from the DCBS director.	Penalty: \$10,000 fine
2006	10/2/2006	United States Life Insurance Company in the City of New York, The	Health	Houston, Texas	Violation: Issued a group health insurance policy to unapproved associations.	Penalty: \$20,000 fine
2006	10/11/2006	Pan-American Life Insurance Company	Health	Pan-American Life Insurance Company	Violation: Issued a group health insurance policy to unapproved associations.	Penalty: \$30,000 fine
2006	12/12/2006	American Standard Insurance Company of Wisconsin	Auto	Madison, Wisconsin	Violation: Refused to pay a claim without conducting a reasonable investigation.	Penalty: \$3,000 fine
2006	12/18/2006	Progressive Northern Insurance Company	Auto	Mayfield Village, Ohio	Violation: Failed to acknowledge and act promptly upon claim communications.	Penalty: \$10,000 fine
2007	2/6/2007	Healthy Alliance Life Insurance Company	Life	St. Louis, Missouri	Violation: Issued a group life insurance policy to an unapproved association.	Penalty: \$5,000 fine
2007	2/13/2007	John Alden Life Insurance Company	Health	Milwaukee, Wisconsin	Violation: Failed to apply creditable coverage from prior health insurance policies. Used impermissible information to evaluate the health status of applicants.	Penalty: \$10,000 fine
2007	2/13/2007	Time Insurance Company (Formerly known as Fortis Insurance Company)	Health	Milwaukee, Wisconsin	Violation: Failed to apply creditable coverage from prior health insurance policies. Refused to pay claims without conducting a reasonable investigation. Used impermissible information to evaluate the health status of applicants. Issued policies using an unapproved form. Failed to timely notify claimants that it needed more time to accept or deny claims.	Penalty: \$60,000 fine
2007	3/14/2007	GEICO General Insurance Company	Auto	Washington, D.C.	Violation: Failed to promptly and equitably settle a claim.	Penalty: \$5,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2007	3/19/2007	Fidelity National Title Insurance Company	Title	Jacksonville, Florida	Violation: Issued a title insurance policy not in compliance with its approved rate filing.	Penalty: \$10,000 fine
2007	4/3/2007	Farmers Insurance Company of Oregon	Auto	Tigard, Oregon	Violation: A market conduct examination of Farmers as of December 31, 2004, found that the company did not comply with Oregon insurance credit scoring laws. Farmers also did not handle automobile total loss settlements in accordance with policy provisions and statutes and rules.	Penalty: \$20,000 fine
2007	4/3/2007	Mid-Century Insurance Company	Auto	Los Angeles, California	Violation: A market conduct examination of Mid-Century as of December 31, 2004, found that the company did not comply with Oregon insurance credit scoring laws. Mid-Century also did not comply with claims handling laws and did not handle total loss settlements in accordance with policy provisions and statutes and rules.	Penalty: \$20,000 fine
2007	4/16/2007	Reliance Standard Life Insurance Company	Life	Philadelphia, Pennsylvania	Violation: Issued a group life insurance policy and a group health insurance policy to an unapproved association.	Penalty: \$10,000 fine
2007	4/30/2007	ACE American Insurance Company	Health	Philadelphia, Pennsylvania	Violation: Issued a group health insurance policy to unapproved associations.	Penalty: \$15,000 fine
2007	4/30/2007	Stonebridge Life Insurance Company	Health	Plano, Texas	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2007	5/21/2007	Guarantee Trust Life Insurance Company	Health	Glenview, Illinois	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2007	5/30/2007	Northland Insurance Company	Auto	St. Paul, Minnesota	Violation: Failed to promptly and equitably settle a claim.	Penalty: \$5,000 fine
2007	5/30/2007	Presidential Life Insurance Company	Health	Dallas, Texas	Violation: Issued a group health insurance policy to unapproved associations.	Penalty: \$15,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2007	7/5/2007	AIU Insurance Company, American Home Assurance Company, AIG Casualty Company, Commerce and Industry Insurance Company, Granite State Insurance Company, Illinois National Insurance Company, National Union Fire Insurance Company of Pittsburgh PA, New Hampshire Insurance Company, The Insurance Company of the State of Pennsylvania	Worker Comp		Violation: Failed to comply with Oregon laws for processing claims of injured workers and reporting proof of insurance coverage. Used unapproved policy forms. Failed to accurately report workers' compensation premiums and claims data.	Penalty: \$5 million fine, with \$4 million suspended. The companies must comply with corrective actions contained in the order to avoid paying the suspended fine.
2007	8/23/2007	United Healthcare Insurance Company	Health	Hartford, Connecticut	Violation: United Healthcare Insurance Company and 25 of its subsidiaries and affiliates entered into a regulatory settlement agreement (RSA) to resolve "areas of concern" identified in a multi-state analysis of the companies. Areas of concern included claims processing; coordination of benefits; complaints, grievances, and appeals; responses to regulatory and consumer inquiries; and oversight of contracted entities.	Penalty: Among provisions of the RSA, the companies agreed to pay up to a \$20 million fine, make corrective actions, and pay any claims that should have been paid. Oregon's share of the fine is estimated to be \$42,346.03.
2007	9/20/2007	PacifiCare of Oregon, Inc.	Health	Lake Oswego, Oregon	Violation: Denied claims without conducting a reasonable investigation. Failed to acknowledge and act promptly on claim communications. Failed to timely respond to an inquiry from the DCBS director.	Penalty: \$34,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2007	10/11/2007	The MEGA Life and Health Insurance Company	Life	North Richland Hills, Texas	Violation: Violations included failing to: 1) notify insureds about potential creditable coverage, 2) refer to policy provisions in notices of claim denial, 3) provide information to insureds about its grievance and appeal procedures, 4) provide information to insureds about how to access the DCBS complaint line, 5) acknowledge grievances, 6) timely acknowledge grievances, 7) timely decide a grievance, 8) timely file with DCBS summaries of grievances and appeals, and external reviews, 9) timely acknowledge or pay claims, 10) acknowledge and act promptly on claim communications, 11) provide an explanation of portability coverage to insureds, 12) give the required notice to insurance producers before termination.	Penalty: \$50,000 fine
2007	10/12/2007	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Health	Portland, Oregon	Violation: Failed to timely pay or deny clean health insurance claims.	Penalty: \$10,000 fine
2007	10/17/2007	Ticor Title Insurance Company	Title	Jacksonville, Florida	Violation: Gave a thing of value to an intermediary.	Penalty: \$6,000 fine
2007	11/8/2007	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Health	Portland, Oregon	Violation: Evaluated the health status of applicants for group health insurance.	Penalty: \$10,000 fine
2007	11/8/2007	Nationwide Mutual Insurance Company	Auto	Columbus, Ohio	Violation: Failed to acknowledge and act promptly on claim communications.	Penalty: \$10,000 fine
2007	11/13/2007	Reliance Standard Life Insurance Company	Health	Philadelphia, Pennsylvania	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2007	12/26/2007	Presidential Life Insurance Company	Health	Nyak, New York	Violation: Issued a group health insurance policy to an unapproved association.	Penalty: \$5,000 fine
2008	2/15/2008	AIG Casualty Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$7,500 fine
2008	2/15/2008	American Home Assurance Company	Homeowner	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000 fine
2008	2/15/2008	Commerce and Industry Insurance Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000 fine
2008	2/15/2008	Farmers Insurance Company of Oregon	Property & Casualty	Tigard, Oregon	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000 fine
2008	2/15/2008	Farmers Insurance Exchange	Property & Casualty	Los Angeles, California	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$2,500 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2008	2/15/2008	Granite State Insurance Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$5,000 fine
2008	2/15/2008	Liberty Northwest Insurance Corporation	Property & Casualty	Portland, Oregon	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$2,500 fine
2008	2/15/2008	Mid-Century Insurance Company	Property & Casualty	Los Angeles, California	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$2,500 fine
2008	2/15/2008	New Hampshire Insurance Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$2,500 fine
2008	2/15/2008	The Insurance Company of the State of Pennsylvania	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000 fine
2008	3/5/2008	Virginia Surety Company, Inc.	Health	Glenview, Illinois	Violation: Issued group health insurance policies to unapproved groups.	Penalty: \$25,000 fine
2008	4/15/2008	Title Insurance Company of Oregon dba First American Title Insurance Company of Oregon	Title	Portland, Oregon	Violation: Gave a thing of value to an intermediary.	Penalty: \$6,000 fine
2008	6/19/2008	Country Preferred Insurance Company	Auto	Bloomington, Illinois	Violation: Refused to pay a claim without conducting a reasonable investigation.	Penalty: \$3,000 fine
2008	8/8/2008	The MEGA Life and Health Insurance Company, Mid-West National Life Insurance Company of Tennessee, and The Chesapeake Life Insurance Company (collectively referred to as HealthMarkets Companies)	Health	North Richland Hills, Texas	Violation: Insurance regulators from 35 states and the District of Columbia, through the National Association of Insurance Commissioners, alleged the companies had numerous deficiencies including oversight, communication, monitoring, and training of agents; processing and handling of claims made by policyholders; disclosure of relationships with membership associations and affiliated companies to consumers and policyholders; handling of policyholder complaints and grievances; and adherence to a compliance plan. The companies entered into a regulatory settlement agreement (RSA) dated May 29, 2008, with the participating state insurance regulators.	Penalty: The companies agreed to a \$20 million penalty to be distributed among the participating jurisdictions, implement outreach program for policyholders, and report progress on performance standards. The companies must submit to a follow-up market conduction examination.
2008	8/13/2008	Title Insurance Company of Oregon dba First American Title Insurance Company of Oregon	Title	Portland, Oregon	Violation: Gave a thing of value to an intermediary.	Penalty: \$6,000 fine
2008	8/25/2008	Providence Health Plan	Health	Beaverton, Oregon	Violation: Failed to timely respond to DCBS director's inquiry.	Penalty: \$2,000 fine

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2008	10/30/2008	Bankers Life and Casualty Company	Annuity	Carmel, Indiana	Violation: Engaged in Unsuitable Annuity Transactions	Penalty: Ordered to review certain annuity sales since January 2005, take corrective action to protect future clients and fined \$150,000.
2008	12/17/2008	PacificSource Health Plans	Health	Springfield, Oregon	Violation: Failed to notify claimants that it needed additional time to investigate claims	Penalty: \$20,000 fine
2008	12/30/2008	PacifiCare Life Assurance Company	Health	Cypress, California	Violation: Failed to pay claim without conducting a reasonable investigation, failed to limit pre-existing conditions provision in health benefit plan to six months, and failed to acknowledge and act promptly on a claim.	Penalty: \$46,000
2009	1/2/2009	American Family Mutual Insurance Company	Homeowner	Madison, Wisconsin	Violation: Failed to acknowledge and act promptly on communications about claims. Failed to adequately document claim file	Penalty: \$6,500
2009	1/2/2009	Austin Mutual Insurance Company	Other	Minneapolis, Minnesota	Violation: Terminated agents without sufficient notice	Penalty: \$1,600 fine
2009	1/2/2009	Title Insurance Company of Oregon dba First American Title Insurance Company of Oregon	Title	Portland, Oregon	Violation: Gave a thing of value to an intermediary.	Penalty: \$6,000 fine
2009	1/26/2009	Kaiser Foundation Health Plan of the Northwest dba Kaiser Permanente	Health	Portland, Oregon	Violation: Failed to promptly provide proper explanation for claim denials	Penalty: \$9,000
2009	1/26/2009	National Union Fire Insurance Company of Pittsburgh, PA	Health	New York, New York	Violation: Issued group health insurance policies to unapproved associations	Penalty: \$65,000
2009	1/30/2009	Virginia Surety Company, Inc	Health	Glenville, Illinois	Violation: Issued group health insurance policy to unapproved group	Penalty: \$10,000
2009	3/31/2009	Transamerica Life Insurance Company	Life	Cedar Rapids, Iowa	Violation: Issued group life and group health insurance policies to unapproved groups.	Penalty: \$25,000
2009	4/14/2009	AMEX Assurance Company	Other	Green Bay, Wisconsin	Violation: Issued policies using unapproved forms and rates	Penalty: \$25,000
2009	4/27/2009	Signal Service Solutions, LLC	Unlicensed	Wayne, Pennsylvania	Violation: Sold service contracts in Oregon as an obligor without being registered.	Penalty: \$78,000
2009	4/30/2009	Stewart Title Guaranty Company	Title	Houston, Texas	Violation: Failed to use a title plant as required by Oregon law in transaction involving real estate title. Failed to promptly and truthfully respond to an inquiry from the DCBS director.	Penalty: \$30,000

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2009	5/21/2009	First American Title Insurance Company	Title	Santa Ana, California	Violation: Issued title insurance policies in Grant County that were not based on a title plant that met legal requirements. Issued title insurance policies in Grant County using a policy form that was not filed with and approved by the DCBS director. Issued title insurance policies in Grant County using premium rates that were not filled with and approved by the director. Failed to respond promptly to inquiries from the director.	Penalty: \$61,000
2009	6/17/2009	Regence BlueCross BlueShield of Oregon	Health	Portland, Oregon	Violation: Failed to promptly respond to an inquiry from the Department of Consumer and Business Services director.	Penalty: \$5,000
2009	9/17/2009	Bankers Life and Casualty Company	Other	Carmel, Indiana	Violation: Terminated agents without sufficient notice.	Penalty: \$2,000
2009	10/5/2009	Progressive Classic Insurance Company	Auto	Cleveland, Ohio	Violation: Refused to pay claim without conducting a reasonable investigation. The company initially denied a claim for personal injury benefits under an automobile policy without checking to see that the claimant was, in fact, covered under the policy.	Penalty: \$3,000
2009	10/29/2009	Providence Health Plan	Health	Portland, Oregon	Violation: Failed to pay more than 6,800 claims without conducting a reasonable investigation.	Penalty: \$30,000
2009	11/2/2009	Fidelity National Property and Casualty Insurance Company	Homeowner	Jacksonville, Florida	Violation: Company declined to issue homeowner's insurance policies in 22 instances based solely on the applicants' credit history.	Penalty: \$10,000
2009	11/12/2009	Title Insurance Company of Oregon dba First American Title Insurance Company of Oregon	Title	Portland, Oregon	Violation: Failed to promptly respond to DCBS director's inquiries about a claim.	Penalty: \$18,000
2009	11/30/2009	Farmers Insurance Company of Oregon	Homeowner	Hillsboro, Oregon	Violation: Used consumer's insurance score to re-rate at renewal of personal auto and homeowners insurance policies in 8,385 instances from Jan. 1, 2006 through Feb. 13, 2009.	Penalty: \$10,000
2009	12/15/2009	Liberty Northwest Insurance Corporation	Other	Boston, Massachusetts	Violation: Failed to promptly and truthfully respond to a DCBS director's inquiry.	Penalty: \$5,000
2010	5/6/2010	Lincoln Benefit Life Company	Life	Northbrook, Illinois	Violation: Failed to completely respond to director's inquiry about the suitability of policies sold to some consumers.	Penalty: \$2,000
2010	6/24/2010	Bankers Life and Casualty Company	Life	Carmel, Indiana	Violation: Violated order of DCBS director by failing to review certain annuity applications a second time to ensure they were suitable for clients.	Penalty: \$25,000

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2010	6/28/2010	Conseco Life Insurance Co. et al	Life	Carmel, Indiana	Violation: Insurance regulators from multiple states allege violations in the sale, administration and management of Lifetrend whole life insurance policies.	Penalty: Insurer pays \$1 million to states that signed the settlement agreement, completes required reporting and monitoring of Lifetrend policies, compensates policyholders in a variety of ways ranging from adding policy benefits to reinstating certain surrendered policies to providing refunds in certain cases.
2010	9/23/2010	Allstate Insurance Company et al	Auto	Northbrook, Illinois	Violation: A multistate examination of Allstate's use of a computer software program, called Colossus, in settling injury claims found deficiencies in Allstate's management and oversight of the program and recommended that Allstate enhance its management oversight of the program and provide notice to claimants that the software program may be used in the adjustment of their injury claims.	Penalty: Allstate provided \$10 million to a fund that will train insurance regulators in ways to monitor the insurance industry's use of software in claims handling.
2010	11/16/2010	The Travelers Home and Marine Insurance Company	Homeowner	Hartford, Connecticut	Violation: Failed to respond timely to the DCBS director's inquiry into a claim.	Penalty: \$2,000
2010	11/16/2010	United Schools Insurance Program of Oregon	Unlicensed	Portland, Oregon	Violation: Transacted insurance in Oregon as an insurer without a license; program was not exempt from being licensed from at least July 1, 2009, to July 31, 2010.	Penalty: \$5,200
2010	12/20/2010	UnitedHealthcare Insurance Company	Health	Hartford, Connecticut	Violation: Sent multiple appeal decisions to members over a nearly three-year period that failed to inform them of the opportunity to file a complaint with DCBS; failed to notify members that additional time was needed to accept or deny claims	Penalty: \$20,000
2011	1/25/2011	Bankers Life and Casualty Company	Medicare	Carmel, Indiana	Violation: Failed to notify policyholders about Medicare supplement insurance premium change	Penalty: \$5,000
2011	2/28/2011	American International Group, Inc	Worker Comp	New York, New York	Violation: Multistate investigation alleges underreporting of workers' compensation premium.	Penalty: AIG agrees to pay nationwide fine of \$100 million plus \$46.6 million in additional premium taxes and assessments; Oregon's share of the fine is \$1.1 million and its share of assessments is nearly \$2.6 million.
2011	3/28/2011	American Mercury Insurance Company	Auto	Oklahoma City, Oklahoma	Violation: Failed to notify claimants in writing about claim denials	Penalty: \$15,000
2011	4/13/2011	Hallmark Insurance Company	Other	Fort Worth, Texas	Violation: Terminated agents without sufficient notice	Penalty: \$2,800

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2011	5/10/2011	Providence Health Plan	Health	Beaverton, Oregon	Violation: Failed to notify insured and provider of additional information needed to process claims	Penalty: \$20,000
2011	5/24/2011	Regence BlueCross BlueShield of Oregon	Health	Portland, Oregon	Violation: The company failed to reimburse applicants the full costs of medical information requested by the company in evaluating applicants' Oregon Standard Health Statement.	Penalty: \$10,000
2011	5/24/2011	The Mega Life and Health Insurance Company	Health	North Richland Hills, Texas	Violation: Refused to pay claims without conducting reasonable investigations	Penalty: \$40,000
2011	7/11/2011	Aetna Life Insurance Company	Life	Hartford, Connecticut	Violation: Issued a group life insurance policy to an unapproved trust; issued group health insurance policy to unapproved trust.	Penalty: \$20,000
2011	7/11/2011	Brokers National Life Assurance Company	Health	Austin, Texas	Violation: Issued a group health insurance policy to an unapproved association	Penalty: \$15,000
2011	7/11/2011	Metropolitan Life Insurance Company	Life	Tampa, Florida	Violation: Issued a group life insurance policy to an unapproved trust; issued group health insurance policy to unapproved trust.	Penalty: \$5,000
2011	7/11/2011	PacifiCare of Oregon, Inc.	Health	Cypress, California	Violation: Issued a group health insurance policy to unapproved trust.	Penalty: \$10,000
2011	7/11/2011	Pan-American Life Insurance Company	Health	New Orleans, Louisiana	Violation: Issued a group health insurance policy to unapproved association	Penalty: \$5,000
2011	7/11/2011	Providence Health Plan	Health	Beaverton, Oregon	Violation: Issued a group health insurance policy to unapproved trust	Penalty: \$10,000
2011	7/11/2011	Standard Insurance Company	Health	Portland, Oregon	Violation: Issued a group health insurance policy to unapproved trust	Penalty: \$15,000
2011	7/11/2011	Symetra Life Insurance Company	Health	Seattle, Washington	Violation: Issued stop loss policy to unapproved trust	Penalty: \$10,000
2011	7/11/2011	The Union Labor Life Insurance Company	Health	Washington, D.C.	Violation: Issued group life insurance policy to unapproved trust; issued group health insurance policy to unapproved trust	Penalty: \$10,000
2011	7/11/2011	United of Omaha Life Insurance Company	Life	Omaha, Nebraska	Violation: Issued group life insurance policy to unapproved trust	Penalty: \$5,000
2011	7/11/2011	UnitedHealthcare Insurance Company	Health	Hartford, Connecticut	Violation: Issued group health insurance policy to unapproved trust	Penalty: \$5,000
2011	8/11/2011	Health Net Health Plan of Oregon	Health	Tigard, Oregon	Violation: Health Net misrepresented to claimants seeking chemical dependency or mental health services under group health insurance policies that the policies required prior authorization before receiving the services.	Penalty: \$5,000
2011	10/25/2011	UnitedHealthcare Insurance Company	Health	Hartford, Connecticut	Violation: Failed to notify members that company needed additional information to process claims	Penalty: \$20,000
2011	11/21/2011	Williamsburg National Insurance Company	Property & Casualty	Southfield, Michigan	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$5,000

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2012	1/24/2012	21st Century Pacific Insurance Company	Property & Casualty	Wilmington, Delaware	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$20,000
2012	1/24/2012	American Home Assurance Company	Homeowner	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$20,000
2012	1/24/2012	Chartis Property Casualty Company	Homeowner	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000
2012	1/24/2012	Industry Insurance Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$20,000
2012	1/24/2012	New Hampshire Insurance Company	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$30,000
2012	1/24/2012	The Insurance Company of the State of Pennsylvania	Property & Casualty	New York, New York	Violation: Recouped more from insureds than its assessment by the Oregon Insurance Guaranty Association.	Penalty: \$10,000
2012	2/6/2012	Bankers Life and Casualty Company	Life	Carmel, Indiana	Violation: Failed to acknowledge claim and settle claim promptly.	Penalty: \$14,000
2012	2/6/2012	Hartford Life and Accident Insurance	Life	Hartford, Connecticut	Violation: Issued group insurance policy to unapproved association	Penalty: \$5,000
2012	2/15/2012	American Medical and Life Insurance	Life	New York, New York	Violation: Issued group health insurance policy to unapproved association	Penalty: \$20,000
2012	3/6/2012	Aetna Life Insurance Company	Life	Hartford, Connecticut	Violation: Failed to follow required claims-handling procedures in cases where additional information was needed	Penalty: \$15,000
2012	5/16/2012	Navigators Insurance Company	Other	Rye Brook, New York	Violation: Failed to respond timely to a DCBS director's request for information; failed to notify claimants that it needed more time to investigate claims and the reasons	Penalty: \$17,000
2012	7/23/2012	Government Employees Insurance Company	Auto	Washington, D.C.	Violation: Issued motor vehicle policy for less than required \$20,000 of uninsured motor vehicle property damage coverage	Penalty: \$2,500
2012	8/21/2012	Allianz Life Insurance Company of North America	Life	Minneapolis, Minnesota	Violation: A multistate examination of Allianz practices involving the marketing, sale and handling of annuities.	Penalty: Paid \$10 million to states nationwide (\$20,000 to Oregon) and developed corrective action and remediation plans to ensure suitable annuity sales to past and future clients
2012	8/22/2012	Metropolitan Life Insurance Company et al	Life	New York, New York	Violation: A multistate examination of the adequacy of MetLife's practices to ensure that life insurance, annuities and other funds are timely paid to beneficiaries.	Penalty: Paid \$40 million to states nationwide (\$418,436 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2012	8/23/2012	The Prudential Insurance Company of America et al	Life	Newark, New Jersey	Violation: A multistate examination of the adequacy of Prudential's practices to ensure that life insurance, annuities and other funds are timely paid to beneficiaries.	Penalty: Paid \$17 million to states nationwide (\$158,130 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries
2012	10/26/2012	Nationwide Life Insurance Company, et al.	Life		Violation: A multistate examination of Nationwide insurers' practices to ensure that life insurance, annuities, and other products are promptly paid to beneficiaries.	Penalty: Paid \$7.2 million to states nationwide (\$66,289 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries.
2012	11/16/2012	American International Group, Inc. and others	Life		Violation: A multistate examination of AIG insurers' practices to ensure that life insurance, annuities and other products are timely paid to beneficiary	Penalty: Paid \$11 million to states nationwide (\$138,070 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries
2012	11/16/2012	Chartis, Inc., and others	Health	Pittsburgh, Pennsylvania	Violation: Multistate examination found a variety of operations problems including failure to supervise the sale of certain limited benefit health plans through banks and other vendors; failure to properly file forms and rates with state regulatory agencies; and failure to implement internal controls of agent licensing, claims and consumer complaints.	Penalty: Company agrees to pay minimum nationwide fine of \$39 million; Oregon's share of the fine is \$539,546
2012	12/20/2012	John Hancock Life Insurance Company (U.S.A.) et al.	Life		Violation: A multistate examination of John Hancock companies' practices to ensure that life insurance, annuities and other products are timely paid to beneficiary	Penalty: Paid \$14.9 million to states nationwide (\$180,780 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries
2013	6/5/2013	Automobile Consumer Service Corporation	Auto	Huntsville, Alabama	Violation: Sold 866 vehicle service contracts providing roadside assistance and mechanical breakdown coverage without a license	Penalty: \$116,000
2013	6/13/2013	Life Insurance Company of North America et al	Life		Violation: A multistate examination of company practices involving longterm disability income insurance	Penalty: Paid \$925,000 fine to three states that were lead investigators; company required to improve its claim handling practices, re-examine certain past claim decisions and agree to future monitoring.
2013	7/18/2013	Allstate Insurance Company	Other	Northbrook, Illinois	Violation: Allstate paid commissions to an insurance agency that sold its products after the agency's business entity license in Oregon had expired.	Penalty: \$50,000
2013	7/31/2013	Insurance Company and Teachers Insurance and Annuity Association of America	Life		Violation: A multistate examination of company practices to ensure that life insurance, annuities and other products are timely paid to beneficiary	Penalty: Paid \$6.2 million to states nationwide (\$54,561 to Oregon), and initiated reforms to ensure thorough searches for beneficiaries

Oregon Insurance Division Marketplace Enforcement Actions (All Insurance Lines) 1998-2016

Year	Date:	Name:	Ins Type:	Location:	Violation:	Penalty:
2013	9/18/2013	Progressive Classic Insurance Company	Auto	Cleveland, Ohio	Violation: Failed to act promptly on a claim and to respond promptly to a DCBS inquiry	Penalty: \$6,000
2013	9/23/2013	ING Life Insurance and Annuity Company et al	Life		Violation: A multistate examination of company practices involving identifying and paying beneficiaries of life insurance, annuities, and retained asset accounts	Penalty: Paid \$10.7 million nationwide (\$160,802.73 to Oregon) and required reforms to ensure timely and efficient searches for beneficiaries.
2013	10/15/2013	Transamerica Life Insurance Company et al	Life		Violation: A multistate examination of company practices to ensure that life insurance, annuities and other products are timely paid to beneficiary	Penalty: Paid \$11.2 million to all participating states and initiated reforms to ensure thorough searches for beneficiaries. Oregon participated in the settlement and received \$60,663.67.
2013	12/4/2013	New York Life Insurance Company et al	Life		Violation: A multistate examination of company practices involving identifying and paying beneficiaries of life insurance and annuities	Penalty: Paid \$15 million to states nationwide (\$230,276 to Oregon) and required reforms to ensure thorough searches for beneficiaries
2013	12/13/2013	Bankers Life and Casualty Company	Long-Term Care	Chicago, Illinois	Violation: Numerous instances of claims mishandling involving long-term care insurance policies	Penalty: \$115,000 fine, company must review certain past claims and develop a corrective plan to prevent future claims mishandling
2014	1/9/2014	Aviva Life and Annuity Company et al	Life		Violation: A multistate examination of company practices to ensure that life insurance, annuities and other products are timely paid to beneficiaries.	Penalty: \$4 million to participating states (about \$35,000 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries.
2014	1/9/2014	Midland National Life Insurance Company, et al	Life		Violation: A multistate examination of company practices to ensure that life insurance, annuities and other products are timely paid to beneficiaries.	Penalty: \$3.3 million to participating states (about \$14,200 to Oregon) and initiated reforms to ensure thorough searches for beneficiaries.
2014	8/7/2014	Time Insurance Company	Health	Milwaukee, Wisconsin	Violation: Failed to make a decision on internal appeals within 30 days.	Penalty: \$40,000
2014	9/12/2014	Lenovo (United States) Inc.	Unlicensed	Morrisville, North Carolina	Violation: Sold service contracts in Oregon as an obligor without being registered.	Penalty: \$70,000