

## State Regulatory Responses to COVID-19

State	Cancellation and Nonrenewal Moratoriums, Premium Payment Grace Periods, and Similar Policyholder Accommodations
Alabama	<a href="#">Bulletin 2020-05</a> (March 30, 2020) – The Commissioner of Insurance recommends insurers consider the following actions for applicable policies in force as of March 13, 2020: (1) relaxing due dates for premium payments; (2) extending grace periods; (3) waiving late fees and penalties; (4) allowing premium payment plans which will avoid a lapse in coverage; and (5) expanding automobile coverage to allow personal vehicles to be covered while delivering food, medicine or other essential services for commercial purposes. The bulletin also indicated that insurers should consider cancellation or nonrenewal of policies only after exhausting all efforts to work with policyholders to continue coverage and that policies may be cancelled or nonrenewed for permissible reasons other than late payment or failure to pay premiums.
Alaska	<a href="#">Order R20-04</a> (April 15, 2020) – The Division’s order prohibits carriers from terminating insurance contracts due to nonpayment and notes that policyholders or their brokers shall notify insurers that they intend to continue coverage. The extension of the grace period does not eliminate the obligation to pay the premium, but limits policy cancellation for late payment. The order also notes that, in instances where carriers do not collect premium payments directly, carriers nonetheless bear the credit risk if policyholders do not satisfy their payment commitments under applicable agency bill or premium finance agreements after the grace period ends. A subsequent clarifying order ( <a href="#">Order R20-07</a> ; April 16, 2020) makes clear that these prohibitions remain in effect until June 1, 2020.  <a href="#">Bulletin B 20-08</a> (March 18, 2020) – The bulletin notes that the Division of Insurance prohibits carriers from terminating insurance contracts due to nonpayment and that any grace period does not eliminate the obligation to pay. It also encourages carriers to work with policyholders in the collection of premiums and to waive all late fees. The bulletin remains in effect until June 1, 2020.
Arizona	<a href="#">Regulatory Bulletin 2020-04</a> (April 16, 2020) – The Department’s bulletin encourages all insurers to work with insureds to ensure that coverage continues, policies do not lapse, and claimants have adequate time to fulfill requirements to obtain coverage and claims payments. The bulletin urges companies to consider the offering the following and other types of relief: (1) refraining from cancelling or nonrenewing policies for nonpayment during the period of hardship; (2) granting a premium payment grace period; (3) working with insureds on payment plans for late premium payments; (4) waiving late fees, interest, and penalties; (5) delaying premium increases; (6) suspending the use of credit reports for rating; etc.
Arkansas	<a href="#">Bulletin No. 12-2020</a> (March 27, 2020) – The Insurance Department issued a 60-day moratorium on the cancellation or non-renewal of personal lines policies and directs all insurers and regulated entities to keep any policy in place on March 11, 2020, in effect until the expiration of the governor’s state of emergency declaration. The bulletin later states that it applies only to cancellations and nonrenewals that are attributable to nonpayment of premiums and to insureds that have been terminated, laid off, or have experienced a cessation of work. Affected policyholders must request the extension from their carriers, and those companies may request evidence of employment disruption. The bulletin does not constitute a waiver of the obligation to pay the premiums.

	<a href="#">Bulletin No. 6-2020</a> (March 20, 2020) – The Insurance Department issued a 60-day moratorium on the cancellation or non-renewal of policies of the nonpayment of premium for Arkansans diagnosed with or that have positively tested for COVID-19. The moratorium applies to all insurance policies, but affected policyholders must request this extension from their insurers. Insurers may request proof of the diagnosis.
California	<a href="#">Notice</a> (March 18, 2020) – The Insurance Commissioner is requesting that all insurers provide all insureds with at least a 60-day grace period to pay premiums. The notice also asks all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers to take steps to ensure that customers have the ability to make prompt insurance payments, and it indicates that this should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods.
Colorado	<a href="#">Bulletin B-5.38</a> (March 27, 2020) – The Division of Insurance directs all insurance companies issuing coverage to P&C policyholders to make reasonable accommodations for individuals and business, including (but not limited to) extensions of premium grace periods, waivers of late fees, moratoriums on cancellations for nonpayment, deferrals on any nonrenewal underwriting actions, and continuations of coverage for expiring policies. Such accommodations should be available and explained on insurer websites as long the state of emergency continues. Insurers should also take steps to encourage the use of electronic payment technology on websites, apps, and electronic bank transfers whenever possible. The Division subsequently issued a FAQ document that, among other things, notes that regulators expect premium finance companies to follow the same guidance and provide clients with assistance during this unprecedented crisis.
Connecticut	<a href="#">Bulletin Number IC-40</a> (March 24, 2020) – The Insurance Department is requesting that all insurance companies provide insureds with at least a 60-day grace period to pay premiums, without penalty of interest, so that policies are not cancelled for nonpayment. Providing such a grace period is not intended to change the terms of the issued policy or be considered a forgiveness of the premium. The bulletin also requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers to take steps to ensure that customers have the ability to make these payments promptly, and it indicates that this should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods.  <a href="#">Executive Order No. 7S</a> (April 1, 2020) and a related <a href="#">notice</a> issued by the Insurance Department the following day further address these issues. The notice addresses inquiries received from insurers asking whether written notice is required to be provided to insureds notifying them of the 60-day grace period for premium payments as outlined in the order, and the Department has said that it would be appropriate for insurers to notify insureds, brokers, and producers of the 60-day period by any reasonable means.
Delaware	<a href="#">Bulletin</a> (March 27, 2020) / <a href="#">Sixth Modification of the State of Emergency Declaration</a> (March 24, 2020) – Insurers may not lapse, terminate or cause to be forfeited a covered insurance policy because a covered policyholder does not pay a premium or interest or indebtedness on a premium under the policy that is due during the state of emergency. The directive defines a “covered insurance policy” to mean a policy for health insurance, life insurance, disability insurance, property insurance, motor vehicle insurance, and commercial/business insurance and a “covered policyholder” to mean any individual or business who, as a result of the conditions imposed under the state of emergency, was laid off or fired from their employment or was required to close or significantly reduce its business.
District of Columbia	<a href="#">Commissioner’s Order 03-2020</a> (April 27, 2020) – The Department’s order establishes a series of obligations that apply to all policies issued by authorized companies in effect on April 27 and that remain in effect until the end of the public health emergency declared by the Mayor. The order prohibits insurers and premium finance companies from terminating policies due to nonpayment. It does not eliminate the duty of pay unpaid premiums, but it requires companies to eliminate late fees and provide

	the ability to repay any such premiums in installments over a period of twelve months or longer. The order also requires insurance companies to make reasonable accommodations for policyholders and provides a list of possible options that includes: (a) waiving installment, late payment, or reinstatement fees; (b) deferring cancellations, nonrenewals and adverse underwriting actions; (c) extending billing due dates and premium grace periods; (d) making policyholders aware of the accommodations available; etc.
Florida	<a href="#">Informational Memorandum OIR-20-04M</a> (March 25, 2020) – The Office of Insurance Regulation encourages regulated entities, when prudently possible, to be flexible with premium payments in order to avoid a lapse in coverage, and the memorandum notes that such flexibility can include (1) relaxing due dates, (2) extending grace or reinstatement periods, (3) waiving late fees and penalties, and (4) allowing payment plans. It also encourages regulated entities to only consider cancellation of policies if all possible efforts to work with consumers to continue coverage have been exhausted. Finally, it states that regulated entities should extensively and proactively message, to their consumers and agency partners, the avenues by which consumers and agents can communicate specific situations to regulated entities for purposes of allowing flexibility.
Georgia	<a href="#">Directive 20-EX-5</a> (March 20, 2020) – The directive requires all P&C insurers to refrain from cancelling any commercial policies that include business interruption or business income coverage due to nonpayment for 60 days and notes that this moratorium could be extended. It also directs health insurers to refrain from canceling health policies due to nonpayment until further notice.
Hawaii	<a href="#">Memorandum 2020-3I</a> (March 27, 2020) – The Insurance Commissioner encourages insurers selling all lines of insurance to work with insureds to ensure coverage continues during the health emergency and that policies do not lapse, and to consider the following: (1) refrain from cancelling or nonrenewing policies due to nonpayment during this time of hardship and to grant a grace period for premium payments to be made; (2) work with insureds on a structured payment plan for late premium payments; (3) waive late fees and penalties; (4) extend timeframes to complete property and automobile inspections or undergo medical examinations; and (5) continue working with insureds for a period of 60 days after this health emergency has passed, or as long as reasonably practical.
Idaho	<a href="#">Bulletin No. 20-05</a> (April 15, 2020) – The Department's bulletin encourages P&C carriers to consider implementing a variety of measures during the state of emergency, including the waiver of fees, penalties, or other charges relating to an insured's temporary inability to submit premium payments; extensions of premium payment grace periods; and additional time before non-renewals or cancellation become effective.
Illinois	<a href="#">Company Bulletin 2020-09</a> (April 3, 2020) – The Insurance Department requests that all licensed or authorized insurers postpone or withdraw any previous cancellation or nonrenewal notices that have an effective date after March 9 and postpone the issuance of any new such notices (and continue coverage, even in cases of unpaid premium) through at least April 30, 2020.
Indiana	<a href="#">Bulletin 252</a> (March 26, 2020) – Pursuant to the governor's earlier executive order, the Department of Insurance requests all insurance companies institute a moratorium on cancellations and nonrenewals of any policy in effect to allow a grace period for any policyholder in Indiana for any premium payment due between March 19 and May 18, 2020. The directive only applies to cancellations and nonrenewals attributable to a failure to pay premiums during the 60-day period. The bulletin also asks insurance companies to work with impacted insureds in paying the premiums that would have become due during the moratorium period by either allowing a payment plan or a further extension, but the moratorium is not a waiver of the obligation to pay the premiums.  <a href="#">Executive Order 20-05</a> (March 19, 2020) – The order requests that insurers institute a 60-day moratorium on policy cancellations for non-payment of premiums in any line of business. The moratorium does not suspend a policyholder's responsibility for continuing to make premium payments.

Kansas	<a href="#">COVID-19 FAQ</a> (Updated April 27, 2020) – The Department has indicated that it does not have the authority to mandate a moratorium on policy cancellations due to nonpayment of premium.
Louisiana	<a href="#">Emergency Rule 40</a> (March 26, 2020) – Among other elements, the rule prohibits policy cancellations, nonrenewals, and non-reinstatements for reasons other than fraud or material misrepresentation until the rule's expiration on May 12 of the lifting of the state of emergency (whichever comes first). It also suspends notices of cancellation, nonrenewal, and non-reinstatement that had been in force and effect on March 12, and it suspends the authority of a premium finance company to act on behalf of and/or as an agent for an insurer or insured. The rule does not apply to policies issued on or after March 12, prohibits the charging of late fees and interest, and makes clear that the obligation of an insured to pay the premiums owed is not excused.
Maine	<a href="#">Bulletin 442</a> (March 12, 2020) – The bulletin states that carriers must prioritize consumers' needs, make every effort to expedite claims approvals and payments and other essential customer service functions, and make all reasonable accommodations for late payments and other problems that are beyond the consumer's control.
Maryland	<a href="#">Bulletin 20-10</a> (March 20, 2020) – The Insurance Commissioner encourages all life, health, and P&C carriers to make reasonable accommodations so that policyholders do not lose coverage for nonpayment of premium during the emergency. The bulletin notes that reasonable accommodations may include suspension of premiums due, extension of billing due dates and premium grace periods, and waiver of installment and late payment fees. It also states that insurers should take steps to encourage policyholders to use electronic payment technology on websites, apps and electronic bank transfers whenever possible.
Massachusetts	<a href="#">Bulletin 2020-05</a> (March 23, 2020) – The bulletin advises all insurers to provide employers and individuals with as much flexibility as is reasonably possible during the crisis to maintain their existing coverage. It also indicates that carriers should do all of the following: (1) explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance or issuance of coverage; (2) explain grace periods that usually allow distressed policyholders experiencing significant financial hardship to delay payments without coverage being terminated; (3) on a case-by-case basis, work with policyholders experiencing financial hardship to find the best ways to address concerns with the timing of premium payments in order to delay cancellation for nonpayment and collection activity; and (4) explore all possible ways to relax due dates for premium payments; extend grace periods; waive late fees, non-sufficient funds fees, installment fees, and penalties; allow payment plans for premiums payments; assist affected policyholders to find ways that policies do not lapse; and consider cancellation and nonrenewal of policies only after exhausting other efforts to work with policyholders to continue coverage.
Michigan	<a href="#">Bulletin 2020-16-INS</a> (April 13, 2020) – This Director is advising all insurers offering any line of coverage to consider providing flexibility to help insureds that may be unable to pay premiums or file claims in a timely manner. Among other elements, the bulletin strongly encourages insurers to provide insureds with at least a 60-day grace period to pay premiums so that policies are not cancelled for nonpayment, and it notes that companies may do so by offering payment accommodations, such as allowing consumers to defer payments (without incurring interest), extending payment due dates, and/or waiving late or reinstatement fees. It also encourages insurers to allow for payment plans for the back-due premium at the end of an insured's 60-day grace period, in lieu of a balloon-type premium bill. The bulletin remains in effect until 90 days after the governor's state of emergency declaration expires.
Mississippi	<a href="#">Bulletin 2020-3</a> (March 24, 2020) – The Insurance Department issued a 60-day moratorium on the cancellation or nonrenewal of policies for the nonpayment of premiums (effective March 24, 2020), and this applies to all policies issued or issued for delivery in the state. The bulletin makes clear that the moratorium is not a waiver on premium, and it directs insurers to work with impacted policyholders in paying premiums that become due during the moratorium period by either allowing a payment plan or a further extension of the due date for the amount in full. The Department issued a related <a href="#">Q&amp;A document</a> that addresses a number of issues.

	<a href="#">Bulletin 2020-4</a> (April 1, 2020) – The Department issued a subsequent bulletin indicating that insurers may issue cancellation and nonrenewal notices for nonpayment during the 60-day moratorium as long as the required notice period is satisfied and the cancellation or nonrenewal takes effect after the moratorium ends.
Missouri	<a href="#">Bulletin 20-05</a> (March 21, 2020) / <a href="#">FAQ</a> (March 27, 2020) – The bulletin indicates that coverage for Missouri residents should continue under all insurance policies in effect as of March 13, 2020, and remain in effect until such time as Executive Order 20-04 is terminated or the bulletin is rescinded (whichever is later). It also strongly encourages insurers not to cancel, nonrenew, or terminate coverage while the bulletin is in effect and notes that this does not require a waiver of any premiums or other consideration owed on any policy or contract during this period of time. The bulletin also states that the Department anticipates that a failure to pay premiums or remit consideration may subject the policy to a retroactive cancellation in accordance with the policy terms. Finally, the bulletin outlines a separate set of procedures for health insurers to follow.
Montana	<a href="#">Letter to Industry</a> (March 26, 2020) – The Insurance Commissioner issued a letter to the industry recommending several measures insurance companies can take to ease the burden on Montana consumers during the outbreak. The letter specifically noted the following items: <ul style="list-style-type: none"> <li>• Flexible payment solutions that provide additional time to make payments and allow grace periods to delay premium payments;</li> <li>• Suspending premium billing for small businesses that have been shut down or had their operations severely reduced, for a specific number of days or billing cycles</li> <li>• Waiving insurance premium late fees and other fees;</li> <li>• Pausing cancellation of coverage for motorists due to temporary non-payment and policy expiration;</li> <li>• Expediting/expanding automobile coverage to allow personal vehicles to be covered while delivering food, medicine, or other essential provisions for commercial purposes; and</li> <li>• Streamlining administrative processes and paperwork to ease consumer burdens and facilitate continuous coverage.</li> </ul>
Nebraska	<a href="#">Notice</a> (March 27, 2020) – In response to inquiries received from industry, the Department of Insurance issued a bulletin indicating that insurer who provide accommodations to insureds on a consistent and fair basis will not be deemed to violate the state's Unfair Trade Practices Act, Unfair Claims Settlement Practices Act, or associated regulations.
Nevada	<a href="#">Statement</a> (March 30, 2020) – The Division of Insurance encourages all P&C carriers to consider the following relief for those affected by the outbreak: (1) providing an extended grace period before cancellation of coverage; (2) providing flexibility with due dates for premiums; (3) waiving late fees and penalties; (4) payment plans for premiums to avoid a lapse in coverage; and (5) cancelling or nonrenewing policies only if all other efforts are exhausted.
New Jersey	<a href="#">Executive Order No. 123</a> (April 9, 2020) – The order prohibits P&C and life insurance companies and insurance premium finance companies from cancelling any policy or contract for nonpayment for a period of at least 90 days, and a similar 60-day moratorium applies to health or dental benefit plans. Insurers and premium finance companies are required to policyholders or the emergency grace period in a manner prescribed by the Commissioner. At the conclusion of the emergency grace period, each policyholder's unpaid premium shall be amortized over a period of time as directed by the Commissioner.  <a href="#">Bulletin 20-15</a> (April 10, 2020) – The Department issued a bulletin following the executive order that directs all licensed P&C carriers to provide insureds who may be experiencing a financial hardship due to COVID-19 with at least a 90-day grace period to pay insurance premiums. A policyholder may elect this 90-day emergency grace period to begin retroactively on April 1 or opt for the grace period to begin on May 1, and insurers are prohibited from cancelling policies for nonpayment during the extended



	<p>grace period. Insurers are also directed to: (1) waive late payment fees otherwise due, and not report late payments to credit rating agencies, during the 90-day period; (2) allow premiums due but not paid during the 90-day period to be paid over the remainder of the current policy term or up to 12 months in up to 12 equal installments, whichever is longer, except that an insurer may permit a longer repayment period; and (3) ensure that late payments during the 90-day period are not considered in any future premium calculations at any time (i.e. applicable late payments should not be counted for any rating, pricing, tiering attributes, etc.). In addition, all producers and other licensees who accept premium payments must take steps to ensure that customers have the ability to make payments through alternate methods of payment, such as online payments. <a href="#">Bulletin 20-16</a> (April 10, 2020) applies similar requirements to life insurers, and <a href="#">Bulletin 20-17</a> does so for premium finance companies (and the premium finance implications of the latter bulletin are addressed in further detail in a <a href="#">FAQ</a> that was subsequently issued).</p> <p><a href="#">Bulletin 20-04</a> (March 19, 2020) – Consistent with prudent insurance practices, the Department of Banking and Insurance encourages regulated entities and individuals to take such measures as relaxing due dates for premium payments and insurance policy-based loan payments, extending grace periods, waiving late fees and penalties, allowing forbearance with regard to the cancellation and nonrenewal of policies, allowing payment plans for premium payments, extending timeframes to complete property and automobile inspections or undergo medical exams, and exercising judicious efforts to assist affected policyholders and work with them to make sure that their insurance policies do not lapse.</p>
New Mexico	<p><a href="#">Bulletin 2020-006</a> (March 20, 2020) – The bulletin requests all insurance companies to refrain from cancelling or nonrenewing policies for policyholders negatively affected by the disruption due to nonpayment of premiums during the public emergency, or at a minimum, provided extended grace periods for payment of premiums. It encourages the continuation of these practices until 30 days after the emergency is declared over and requests that all insurance companies work with insureds after the emergency is over to allow them to catch up on past due premiums in installments without loss of coverage. The bulletin also requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers to take steps to ensure that customers have the ability to make these payments, and it indicates that this should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods.</p>
New York	<p><a href="#">Emergency Regulation</a> (March 30, 2020) – The emergency regulation requires P&amp;C insurers to provide the following relief to individual consumers and small businesses (i.e. those with 100 or less employees; not including commercial lines policyholders with excess lines policies) who can demonstrate financial hardship due to COVID-19: (1) provide a 60-day grace period for the cancellation, conditional renewal, or non-renewal of a policy; (2) allow premiums due but not paid during the 60-day period to be paid over the course of the following year in 12 equal monthly installments; and (3) waive any late payment fees, and not report late payments to credit rating agencies, during the 60-day period. The rule also allows consumers to defer paying life insurance premiums for 90 days and requires premium finance companies to provide the same relief as insurers. A written attestation from the policyholder is sufficient proof of financial hardship. The Department has developed an <a href="#">FAQ</a>.</p> <p>The rule requires any licensed insurance producer who services an in-force life insurance policy or annuity contract or who procured a P&amp;C insurance policy for an individual or small business to mail or deliver notice to the policyholder or contract holder of the provisions of the rule within ten business days following its issuance (by April 13). The Department has issued subsequent <a href="#">guidance</a> allowing producers to satisfy these disclosure obligations electronically (even in cases where customers have not consented to receiving such notices electronically) and by online posting, and the regulators have developed model notice forms that can be used in connection with both <a href="#">life</a> and <a href="#">P&amp;C</a> customers.</p>

	<p>The Department has also provided subsequent guidance indicating that the moratorium, premium payment grace period, and notice requirements of the rule do not apply to commercial excess lines policies and policyholders, but they do apply to personal lines policies and policyholders.</p> <p><a href="#">Insurance Circular Letter No. 7</a> (March 19, 2020) – The letter urges all regulated entities to help alleviate the adverse impact of COVID-19 on those consumers and small businesses that can demonstrate financial hardship caused by the outbreak, including taking reasonable and prudent actions to support affected New Yorkers by:</p> <ul style="list-style-type: none"> <li>• Offering payment accommodations, such as allowing consumers to defer payments at no cost, extending payment due dates, or waiving late or reinstatement fees, where consumers are unable to make timely payments of premium or fees due to COVID-19-related disruptions;</li> <li>• Working with consumers to avoid cancellation of insurance policies for (a) failure to pay premiums on time, (b) discovery of acts or omissions that may have increased the hazard insured against, or (c) physical changes in the property insured subsequent to issuance or last renewal that result in the property no longer meeting the insurer's underwriting standards;</li> <li>• Working with consumers to avoid non-renewal of insurance policies where a consumer fails to timely respond to a non-renewal notice;</li> <li>• Increasing resources as necessary to accommodate increased claim submissions and increased inquiries from consumers about policy coverage benefits, including reviewing staffing plans to ensure that sufficient personnel are available to field claim submissions or inquiries and are informed on the most up-to-date developments relating to COVID-19;</li> <li>• Preparing clear and concise descriptions of coverage benefits that may be triggered as the COVID-19 situation continues to evolve, which should be posted prominently on insurance company and producer websites and sent in response to policyholder inquiries;</li> <li>• Alerting consumers to the heightened risk of scams and price gouging during financial disruptions, and reminding consumers to contact their insurance providers before purchasing unsolicited insurance policies or changing the terms of current insurance policies;</li> <li>• Ensuring that consumers do not experience a disruption of service if regulated entities close their offices, including making available other avenues for consumers to continue to manage their products and to submit inquiries and claims;</li> <li>• Providing flexibility regarding proof of death, disability, or other condition that triggers benefits under life insurance policies or annuity contracts;</li> <li>• Providing consumers with information and timely access to all medically necessary covered health care services, including testing and treatment for COVID-19, in accordance with all applicable DFS guidance, including <a href="#">DFS Guidance on Preparedness for Coronavirus (COVID-19)</a> and <a href="#">DFS Guidance on Coronavirus and Telehealth Services</a>; and</li> <li>• Proactively reaching out to customers via app announcements, text, email, or otherwise to explain the above-listed assistance being offered to consumers.</li> </ul>
North Carolina	<p><a href="#">Bulletin 20-B-6</a>, a related <a href="#">amendment</a>, and <a href="#">FAQ</a> (March 27, 2020) – The Insurance Commissioner has activated the premium and debt deferral provisions and other requirements of <a href="#">NCGS 58-2-46</a> for all residents and all parts of the state. This requires all insurance companies, premium finance companies, collection agencies, and others to give their customers affected by the health emergency the option to defer premium and debt payments (which includes the ability to avoid cancellation) for a 30-day period ending (after an April <a href="#">extension</a>) on May 27, 2020. Customers must notify their insurance company to exercise this deferral option, and premium payments must still be paid and are not considered to be waived.</p>

	<p><a href="#">Advisory</a> (March 24, 2020) – The Commissioner urges insurers to consider the following actions during the outbreak: consistent with prudent insurance practices, relaxing due dates for premiums payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premiums payments to otherwise avoid a lapse in coverage. The advisory notes that insurers should consider cancellation or nonrenewal of policies only after exhausting other efforts to work with policyholders to continue coverage. It also requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make prompt insurance payments. This should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods, in order to protect the safety of workers and customers.</p>
North Dakota	<p><a href="#">Bulletin 2020-08</a> (March 30, 2020) – The Insurance Department urges all insurers, producers, and others licensed or authorized to transact insurance to provide flexibility and possible relief to those impacted by the pandemic. The bulletin cites numerous examples of such relief, including extension of premium payment deadlines, additional time before cancellations or nonrenewals become effective, development of payment plan options, waiver of fees and similar charges, etc.</p>
Ohio	<p><a href="#">Bulletin 2020-07</a> (March 30, 2020) – The bulletin orders insurers providing P&amp;C, life, and long term care policies to provide their insureds with at least a 60-day grace period to pay insurance premiums (or in connection with any policy provision that imposes a time limit on an insured or claimant performing an act) so that insurance policies are not cancelled for nonpayment of premium during the state of emergency. Insurers should offer payment accommodations, such as allowing consumers to defer payments at no cost, extending payment due dates, or waiving late or reinstatement fees in situations where consumers are unable to make timely payments due to the outbreak.</p>
Oklahoma	<p><a href="#">Bulletin PC 2020-01</a> (Amended April 6, 2020) – The bulletin directs all P&amp;C carriers to extend their applicable grace period for nonpayment of premium by an additional 45 days, but any such extension does not relieve an insured of the obligation to pay and is merely a deferral. The amended bulletin makes clear that this mandate applies also to premium financing arrangements.</p>
Oregon	<p><a href="#">Emergency Order</a> (March 25, 2020) – The Insurance Commissioner and Administrator's order requires all admitted insurers (and strongly encourages surplus lines insurers) to suspend cancellations and nonrenewals for nonpayment and most other reasons and to institute grace periods for premium payment for all active policies until the order is no longer in effect. Premium may be charged for any policy continued beyond its normal cancellation or nonrenewal date based on the terms of the policy. The order also requires all insurers to extend all deadlines for insureds to report claims and provide claims-related communications and to provide all practicable steps to provide opportunities for insureds to report claims in ways that are compatible with social distancing recommendations. It also requests that all agents, brokers, and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make these payments promptly while maintaining social distancing guidelines, and it indicates that this should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods. Pursuant to an <a href="#">extension</a> issued on April 23, the terms of the order remain in effect until May 23, 2020. A related <a href="#">FAQ</a> has also been developed.</p>
Pennsylvania	<p><a href="#">Notice 2020-04</a> (March 19, 2020) – The Insurance Department encourages the entities and individuals it regulates to assist those affected by the outbreak, and the notice applies to commercial and personal, property, casualty, accident and health and life policies. It indicates that insurers should consider the following actions: consistent with prudent insurance practices, relaxing due dates for premiums payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premiums payments to otherwise avoid a lapse in coverage. The notice also states that insurers should consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage.</p>



	<p><a href="#">Notice 20-11</a> (April 13, 2020) – The Department has also issued a bulletin specific to the activities of premium finance companies that encourages those entities, to the greatest extent possible, to accommodate insureds by extending or providing grace periods for loan payments or to be otherwise flexible with respect to determinations of default and especially with regard to cancellations for default. The bulletin encourages premium finance companies to waive or temporarily eliminate any delinquency or other charges that would ordinarily be permitted under state law. The Department is also encouraging insurance carriers to work with premium finance companies to facilitate any grace period modifications and to work with policyholders by providing reasonable flexibility and accommodations that allow a policy to avoid cancellation and remain in effect.</p>
Rhode Island	<p><a href="#">Insurance Bulletin Number 2020-04</a> (March 25, 2020) – The Insurance Division requests that insurers take the following steps to preserve access to insurance coverage during the emergency:</p> <ul style="list-style-type: none"> <li>• Provide as much flexibility as possible to allow insureds to maintain their existing coverage by implementing and extending grace periods for premium payments, allowing payment plans for premium payments and instituting whatever other measures necessary to assist insureds in avoiding or delaying cancellation or a lapse of insurance coverage.</li> <li>• Institute alternative methods of payment for those insureds whose normal method of payment is affected by this emergency. For example, insurers could provide for electronic premium payments as an alternative to in-person payments.</li> <li>• Insurers should institute additional flexibility in the form of waivers of late, insufficient funds and installment fees and penalties, extension of billing due dates and premium grace periods.</li> <li>• Insurers should explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance and/or issuance of coverage.</li> <li>• Insurers should consider filings to alter policies to reflect the anticipated effects of the emergency. These would include, but are not limited to, reduction in premiums for active policies and amendment to coverages to reflect changes in anticipated activities as a result of the emergency such as removal of the exclusion for deliveries in personal automobile policies.</li> <li>• Insurers should explore ways to make claims processes easier and more responsive such as electronic delivery of claims payments and remote adjustment of damages.</li> </ul> <p>None of the requests are intended to change the terms of in-force insurance policies or be considered a forgiveness of premium.</p>
South Carolina	<p><a href="#">Bulletin 2020-02</a> (March 25, 2020) – The bulletin issued by NAIC President Ray Farmer advises all insurers and other licensed or authorized entities and individuals that the Director of Insurance expects the industry to work with citizens and businesses directly impacted by the outbreak to provide relief from certain insurance requirements. The guidance notes that such relief may include, but is not limited to the following: extension of premium payment deadlines; additional time before non-renewals or cancellations become effective; extension of proof of loss deadlines; waivers of limitations relating to the use of out-of-network providers; relaxing time limitations to allow for early prescription refills; relaxing prescription drug formulary limitations to ensure access to prescription drugs resulting from drug shortage or access issues; increasing access to medical care via telehealth; or waiver of fees, penalties or other charges relating to an insured's temporary inability to submit premium payments or otherwise respond as a result of this pandemic.</p>
Tennessee	<p><a href="#">Bulletin 20-03</a> (March 24, 2020) – The Department of Commerce and Insurance requests that carrier provide customers with as much flexibility as practicable during the outbreak and work with those that have concerns about their ability to make premium payments. The bulletin states that insurers should explain options for maintaining continuous coverage and applicable grace periods, and, among other provisions, says they should explore ways to eliminate late fees and similar charges.</p> <p><a href="#">Bulletin 20-05</a> (April 3, 2020) – The Department of Commerce and Insurance and Department of Financial Institutions have jointly issued a bulletin encouraging premium finance companies, to the greatest extent possible, to accommodate insureds by</p>

	extending or providing grace periods for loan payments or to be otherwise flexible with respect to determinations of default under premium finance agreements. Insurance carriers are also encouraged to work with premium finance companies to facilitate any grace period modifications.
Texas	<a href="#">Commissioner's Bulletin B-0007-20</a> (March 23, 2020) – The Department of Insurance expects all carriers to work with policyholders who may experience financial hardships due to the outbreak and encourages them to use grace periods for payments, temporary suspension of premium payments (which does not mean forgiveness of the premium), payment plans, and other actions that allow continuing insurance coverage as appropriate. Automatic bank drafts for premium payments may continue according to a carrier's written agreement with a policyholder, unless a policyholder notifies a carrier of a specific hardship. This should be weighed against the potential disruption to a carrier's business model or the inconvenience caused to the policyholder by multiple payments. It is the Department's expectation that carriers will work directly with policyholders to resolve issues and minimize the effects of any penalties or additional charges.
Vermont	<a href="#">Guidance</a> (March 20, 2020) – The Department of Financial Regulation encourages insurance carriers to be flexible with premium payment plans and premium deposit requirements for businesses that are temporarily closed due to COVID-19 mitigation actions. If carriers can delay or reduce premium payments, this action may assist insureds in keeping their policy active during their temporary shutdown. The Department also suggests that, whenever possible, insureds keep their policies active as there are risks that all businesses encounter even if they are not open for business such as property damage from a peril and premises liability exposures.
Virginia	<a href="#">Notice</a> (March 27, 2020) – The Bureau of Insurance strongly encourages insurers and other licensees (including premium finance companies) to be flexible and take into consideration the hardships and constraints many policyholders are experiencing. The notice specifically encourages licensees to consider the following actions, consistent with prudent insurance practices: (1) insurers should consider relaxing due dates for premium payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premium payments to otherwise avoid a lapse in coverage; (2) insurers should also consider cancellation or non-renewal of policies only after exhausting all other reasonable efforts to work with policyholders to continue coverage.
Washington	<a href="#">Emergency Order No. 20-03</a> (March 25, 2020) – The Insurance Commissioner's order requires all regulated entities that transact P&C business (including the surplus lines industry and premium finance companies) – from the date of issuance through May 9, 2020 – to provide grace periods for nonpayment of premium and to waive otherwise applicable charges and fees associated with nonpayment of premium (including late fees and reinstatement fees). During this 45-day period, no P&C insurer shall cancel a policy issued for nonpayment of premium, unless specifically directed to do so by the insured. The Office of the Insurance Commissioner has developed an FAQ concerning the order that can be found <a href="#">here</a> .
West Virginia	<a href="#">Bulletin No. 20-07</a> (March 26, 2020) / <a href="#">Emergency Order 20-EO-02</a> (March 18, 2020) – Among other provisions, the order states that insurers and other regulated entities must not issue a cancellation notice or nonrenewal notice pertaining to any insurance policy, plan, or contract if the reason for cancellation or nonrenewal is a result of circumstances stemming from the COVID-19 pandemic and the corresponding State of Emergency, Executive Order 2-20, any subsequent executive orders or other governmental actions. The order and subsequent bulletin are not meant to prohibit the cancellation or nonrenewal of all policies and does not apply to insureds or policyholders who were already delinquent or who were or are cancelled or nonrenewed for other valid underwriting reasons. The order and bulletin further state that insurers and other regulated entities should be flexible by voluntarily instituting moratoriums on cancellations or premium collections and allowing for alternative payment arrangements, deferred premium payments, premium holidays, and the acceleration or waiver of underwriting requirements. The documents also make clear that this does not exempt or excuse an insured from the obligation to pay the premiums due.

Wisconsin	<a href="#">Bulletin</a> (March 20, 2020) – The Office of the Commissioner of Insurance encourages insurers to offer flexibility to insureds incurring economic hardship, and the bulletin notes that such flexibility can include offering non-cancellation periods, deferred premium payments, premium holidays and acceleration or waiver of underwriting requirements. The bulletin confirms that accommodations made during the public emergency will not be treated as violation of insurance laws (such as unfair inducement laws), but such accommodations should not be applied in an unfairly discriminatory manner
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