



**State of Maryland
OFFICE OF THE ATTORNEY GENERAL**

ANNUAL REPORT OF THE PEOPLE'S INSURANCE COUNSEL DIVISION

Fiscal Year 2024

I. INTRODUCTION

The People’s Insurance Counsel Division in the Office of the Attorney General (hereinafter referred to as the “Division”) submits this annual report as required by the Maryland General Assembly.¹ On or before the first of January of each year, the Division reports on its activities for the prior fiscal year. This report covers the time period from July 1, 2023, through June 30, 2024.

A. Statutory Basis and Funding

The Division was created in 2005 with the enactment of the Maryland Patients’ Access to Quality Health Care Act of 2004 (hereinafter referred to as “Act”).² The provisions of the Act relating to the Division have been codified in Md. Code Ann., State Government Section 6-301 through 6-308.

Funding of the Division is provided through a People’s Insurance Counsel Fund consisting of funds collected by the Maryland Insurance Commissioner (hereinafter referred to as the “Commissioner”) through an annual assessment from each medical professional liability insurer and homeowners insurer issuing policies in the State. The purpose of the Fund is to pay the costs and expenses of the Division in carrying out its duties.³

B. Statutory Duties

The duties of the Division include evaluation of each medical professional liability insurance and homeowners insurance matter pending before the Commissioner to determine whether the interests of insurance consumers are affected.⁴ The Division has explicit statutory authority to conduct investigations and request the Commissioner to initiate an action or proceeding to protect the interests of insurance consumers (hereinafter referred to as “insurance consumers”, “consumers” and/or “consumer”). The Division is required to review any rate increase of 10% or more filed with the Commissioner by a medical professional liability insurer or homeowners’ insurer. If the Division determines that a rate increase is excessive, inadequate, or unfairly discriminatory, its representative shall appear before the Commissioner at any hearing

¹ Md. Code Ann., State Government § 6-308.

² The Act was introduced as an emergency measure as House Bill 2 in a 2004 Special Session of the Maryland General Assembly convened on December 28, 2004. The Bill passed and was enacted in 2005 over the Governor’s veto with an effective date of January 11, 2005. The Act was amended in 2005, effective March 31, 2005, by another emergency measure, House Bill 836.

³ Md. Code Ann., State Government §§ 6-304 and 6-305. Because the duties of the Division only involve two types of insurance, homeowners insurance and medical professional liability insurance, the insurers who are assessed for the Fund are limited to the insurers issuing those types of policies in Maryland.

⁴ Md. Code Ann., State Government § 6-306(a). The Act defines insurance consumers as those insured under homeowners policies or medical professional liability insurance policies.

on the rate filing. At any time, the Division may conduct investigations and request the Commissioner to initiate an action or proceeding to protect the interests of insurance consumers.⁵

In any appearance before the Commissioner or the courts, the Division has the rights of counsel for a party to the proceeding, including summoning witnesses, cross-examination of witnesses, presenting evidence and argument.⁶ The Division may also take depositions in proceedings before the Commissioner and in proceedings in court, in accordance with applicable law and procedure.

The Division “shall have full access to the Commissioner’s records,” including rate filings, and shall have the benefit of all other information of the Commissioner.⁷ The Division is entitled to the assistance of the Commissioner’s staff provided that the assistance is consistent with the staff’s responsibilities and with the respective interests of the staff and the Division.⁸

The Division may recommend legislation on matters that promote the interests of insurance consumers in Maryland.⁹

In 2011, Counsel was granted access to vendor explanations of catastrophe models but also required to maintain the confidentiality of them.¹⁰

II. DIVISION STAFF AND BUDGET

The Division’s personnel consist of the People’s Insurance Counsel, an assistant attorney general, an analyst/investigator, whose primary responsibilities include review of homeowners and medical liability insurance filings, and a management associate who primarily provides office support including consumer contact.

Three actuarial firms provided consulting services to the Division by reviewing rates and other documents that are filed by insurers issuing policies in Maryland. The following consultants were selected for their expertise in property and casualty rate filings: Kufera Consulting, Inc., Madison Consulting Group, Inc., and Taylor and Mulder, Inc.

⁵ The Division’s duties are described in Md. Code Ann., State Government § 6-306.

⁶ Md. Code Ann., State Government § 6-307.

⁷ Md. Code Ann., State Government § 6-307(c). The Division’s access to information is only limited by applicable statutes in the Insurance Article and the Maryland Public Information Act, General Provisions Article, §§ 4-101 to 4-601.

⁸ Md. Code Ann., State Government § 6-307 (c)(2).

⁹ Md. Code Ann., State Government § 6-307(d).

¹⁰ 2011, chapter 154 —see Md. Code Ann., Insurance §19-211.

III. DIVISION RESPONSIBILITIES

The Division concentrates its efforts in several areas:¹¹

- Review of consumer complaints filed with the Maryland Insurance Administration (hereinafter “MIA”) relating to homeowners insurance and medical professional liability insurance;
- Response to concerns of consumers who contact the Division;
- Review of rate, rule and form filings in those two lines of insurance;¹²
- Review of proposed legislation and participation in the legislative process, as required, to represent consumer interests;
- Investigation of issues generated by patterns identified in consumer complaints and rate filings;¹³
- Review of “lack of good faith complaints” under Insurance Article Section 27-1001;¹⁴ and
- Outreach to consumers.

A. Review of Consumer Complaints filed with the MIA

After a consumer has initiated a complaint with the MIA regarding the action of an insurance company, the MIA conducts an investigation and issues a determination letter to the complainant and insurer at the completion of its investigation. MIA supplies the letters to the Division on a regular basis, enabling the Division to do timely reviews of all the letters to identify issues that potentially impact a number of consumers and to assess the existence of patterns of insurer conduct contrary to the insurance laws. The complaints primarily relate to the cancellation

¹¹ The Division has interpreted its statutory authority to include the review of any matter before MIA that impacts homeowners and medical professional liability policyholders. This decision derives from the Division’s broad mandate to review “each medical professional liability insurance and homeowners insurance matter pending before the Commissioner.” Md. Code Ann., State Government § 6-306(a). Rate filings are reviewed pursuant to a specific mandate to “review any rate increase of 10 percent or more filed with the Commissioner by a medical professional liability insurer or homeowners insurer.” Md. Code Ann., State Government § 6-306(a).

¹² In this Report, references to “Rate Filings” shall mean all filings made under Insurance Article, Title 11, including new and revised rates, rating rules, policy forms and supplementary rate information.

¹³ Several of these are discussed in greater detail later in the Report.

¹⁴ Md. Code Ann., Ins. Art. § 27-1001, effective October 1, 2007.

or non-renewal of coverage, increase in premiums, modifications of coverage, claim denials or claim settlements.

It has become the practice of the Division to issue its own explanatory letter and printed materials to the majority of individuals who have received MIA determination letters.¹⁵ The Division's letter explains that a staff member is available to discuss a consumer's right to an administrative hearing and explains applicable statutory and regulatory frameworks for hearings. Through calls from consumers who have received the Division's letter, the Division obtains additional information about company practices beyond the information detailed in the determination letters themselves. The Division's review of the determination letters and its conversations with affected consumers have provided an opportunity to understand the broader impact of insurers' procedures and policies in making underwriting and claims decisions.

The Division routinely advises consumers that it does not provide legal representation for individuals in their disputes with insurers. The Division does provide information to assist consumers in filing their requests for hearings and aids consumers in understanding the process for using Maryland's Public Information Act to obtain the relevant MIA files regarding their complaints.

In addition to the initial explanatory letter, the Division, upon being notified by the MIA that a complainant has sought and been granted a hearing, sends a letter offering to assist the complainant in understanding the hearing process. The Division has developed a handout about the process so that complainants may better understand how the hearings are conducted. Additionally, the Division has sample subpoena and discovery forms for complainants' use in summoning witnesses and obtaining additional documents for their hearings. The Division attorneys also review Final Orders issued by the Commissioner after hearings held at the MIA or delegated to hearing officers at the Office of Administrative Hearings.

The Division reviewed 563 homeowners' insurance complaint determination letters and four (4) medical professional liability insurance-related complaint determination letters issued by MIA. Most of those complaints involved either consumer dissatisfaction with the handling or payment of a claim, with the action taken by an insurer to cancel insurance coverage or decline to renew coverage, or premium increases. At the determination letter stage, the MIA found violations of Maryland insurance laws in one (1) of the complaints. The Division reviewed 34 final orders from administrative hearings concerning MIA complaints; the MIA found a violation of Maryland insurance laws in one (1) of these matters. MIA agreed to provide notification to the Division when it becomes aware of the filings of a Petition for Judicial Review in homeowners' insurance or medical professional liability insurance. Additionally, the Division periodically checks the Maryland Court Case Search in an effort to determine if a Petition for Judicial Review in a Circuit Court for Maryland. The Division learned of two (2) Petitions for Judicial review filed by

¹⁵ Division letters are not sent to all individuals. Among those who do not receive letters are those whose complaints have been resolved in their favor, who have withdrawn their complaints, or who have replaced their coverage resulting in an MIA letter stating that the issue is rendered moot, and no remedy is available.

homeowners in a Circuit Court for Maryland. Of the follow-up letters issued by the Division to consumers, 67 contacted the Division to discuss their complaints further.

B. Response to Consumers who Initiate their Complaints with the Division

Periodically, consumers contact the Division to discuss their concerns with their insurance companies that are not related to a complaint filed with MIA. These calls typically concern homeowners' insurance issues similar to those addressed to the MIA in complaints.¹⁶ Division attorneys advise callers about options that are available for resolution of their complaints, including policy appraisal procedures and use of public adjusters for claims resolution. The attorneys also often refer consumers to the MIA website for further information about resolving claims through the Rapid Response Program, how to file a formal complaint and/or how to file a lack of good faith complaint. Because Division attorneys do not represent individual consumers, the Division has referred callers to the Maryland Courts Help Centers for limited no-cost legal advice in civil matters. The Division also provides consumers with contact information for the Maryland State Bar Association's and the county bar associations' Attorney Referral Programs. When appropriate, the Division has exercised its statutory authority to request review by the MIA. The Division responded to 118 consumer calls during the fiscal year.

C. Division Review of Rate Filings

Insurance companies issuing homeowners policies in Maryland are required by Title 11 of the Insurance Article to file with the Commissioner all rates, supplementary rate information, policy forms, endorsements and modifications of any of these documents.¹⁷ Homeowners insurance is subject to the competitive ratings laws. Insurers are allowed to use the filed rates without obtaining the prior approval of the Commissioner.¹⁸ All policy forms must be approved by the Commissioner before use in Maryland.

Insurance companies issuing medical professional liability insurance policies in Maryland are required by statute to obtain the approval of the Commissioner before using rates, rules, policy forms and any modifications of such documents.¹⁹ These filings may not take effect until 30 working days after filing with the Commissioner.²⁰

¹⁶ Consumers calling the Office of the Attorney General are often directed to the Division regarding insurance complaints other than homeowners or medical malpractice. The Division attorneys respond to those calls also, redirecting the consumers to other resources that may be of assistance to them.

¹⁷ Md. Code Ann., Ins. Art. § 11-206.

¹⁸ Md. Code Ann., Ins. Art. § 11-307.

¹⁹ Md. Code Ann., Ins. Art. § 11-206(a).

²⁰ Md. Code Ann. Ins. Art. § 11-206(g).

The Division reviewed a total of 359 new filings, including rate filings as well as other filings. The Division expressed concern about several filings either directly to the company or to MIA. If the company did not address the Division's concerns, the Division contacted MIA. Accordingly, the Division did not initiate any hearings on these filings.

Homeowners Insurance

The Division reviewed 302 new homeowners filings filed with the MIA during the fiscal year. These filings included rate increases and decreases, new rating rules, rule changes, new policy forms, revisions to policy forms, and revisions to underwriting guidelines. The Division selects for further review filings in which the insurers are requesting increases or decreases of ten (10) percent or more on all or some policyholders, or when significant increases or decreases have been requested in successive years. Typically, the effect of a rate, rule or form change on consumers is not easily ascertained without in-depth analysis of the filing. The three actuarial consulting firms previously mentioned, each under contract with the Division, are referred significant filings that require actuarial review.

As found in prior years, the Division's consultants determined that multiple filings did not include adequate supporting actuarial data; therefore, the Division's consultants generated questions on the filed documents and made requests for additional supporting information. The Division, through its staff or consulting actuaries, advised the MIA of inquiries forwarded to the insurers. As part of its review of filings, MIA has made requests on some filings that the insurer provide MIA its responses to questions raised by the Division. With few exceptions, the Division's consultants received satisfactory responses from the insurers' actuaries. When necessary, the insurance company after responding to the Division's actuary consultants' inquiries, filed additional or corrected information with MIA.

Significant Homeowners Filing Issues

Predictive Modeling

Many insurers use non-catastrophe predictive models (known as generalized linear models) in setting their rates. The data used in these models is extensive and difficult to evaluate. Considering insurers' increased use of these models, staff members engage in continuing education to better understand the issues presented by modelling.

During Fiscal Year 2018, the MIA Associate Commissioner for Property and Casualty notified the Division that it was implementing procedures to disclose proprietary rate-related information ("PRRI"), pursuant to Md. Code Ann., Ins. Art. § 11-307(c)(3)(iii). MIA has disclosed PRRI when the Division sees reference to it in the public section of a filing and requests it. The Division has no knowledge of which filings have confidential information unless the public sections available to the Division make reference to it. However, there may be a delay in receiving this information from MIA. This delay affects the Division's ability to timely review the filings. MIA and the Division discussed these concerns, and affirmative action is being taken by MIA to ensure a timely response.

Rating Factors

A significant number of companies use ‘age of insured’ and ‘marital status’ as factors in calculating their rates.²¹ The Division’s actuaries have been analyzing the use of the factors in the filings of multiple companies. The Division’s actuaries have noted that the generalized linear models currently employed by companies do generate correlations between age of insured and insurance losses. The correlations, however, are not consistent across the industry as one might expect.²² Some companies’ models reveal higher losses for individuals over forty (40) and therefore have rating factors increase with age of insured. Others decrease the factors for individuals of retirement age. The Division continues to survey companies about the actuarial bases for their use of these factors, anticipating that more industry data will assist the Division in the evaluation of the validity of these factors.

The Division has also noticed some other rating factors being used by companies that affect Maryland insurance consumers. The Division has noted some companies are excluding coverage for virtual currency and coverage related to cannabis. Additionally, some companies are now providing flood endorsements as an option to homeowners’ policies in Maryland. The Division also noticed that some insurers include a limited loss settlement provision. After an inquiry from a consumer, the Division began reviewing the exclusion of specific dog breeds from homeowners’ policy coverage. On occasion, companies have updated their filings to ensure compliance with MIA’s bulletin 15-25 “Homeowner’s/Renter’s Insurance – Dog Bite Liability Exclusion for certain breeds of dogs” issued on September 28, 2015.

Medical Professional Liability Insurance

There are significantly fewer medical professional liability insurance filings received each year by MIA as compared to homeowners insurance filings. The Division reviewed 57 new filings made by medical professional liability insurers during the fiscal year. The Division’s consultants reviewed the medical professional liability filings in the same manner as the homeowners filings; requests for additional documentation were sent to the insurers with copies to MIA actuaries. One new issue which has begun to emerge in medical professional liability filings is biometric data. Some insurers are issuing endorsements clarifying that liability related to the privacy of biometric information is excluded. Additionally, PICD noted that some filings indicated that actuarial estimates for rates were subject to uncertainty from various sources, including but not limited to the Covid-19 pandemic, or that actuarial support for rates were adjusted to account for the impact of the pandemic.

²¹ The marital status factor first came to the Division’s attention in Fiscal Year 2017 when a consumer complaint was made by a widow who realized her homeowners premium increased when her husband died. Maryland Insurance Article 27-501(e-2)(7) now prohibits an insurer from increasing the homeowner’s insurance premium on an insured who becomes a surviving spouse based solely on the insured’s change in marital status (enacted 2019).

²² For example, when it comes to fire risk, there is agreement in the industry that the older a home, a roof, or the greater distance to a fire hydrant, the higher the risk.

D. 2024 Legislative Session

During the 2024 Legislative Session, the Division conducted an initial review of 51 bills, monitored 25 bills, and provided written testimony in support of 3 bills identified on the Maryland General Assembly website as “Insurance – Other than Health” or as “Real Property” or other search terms to determine if any bill had a potential impact on homeowners or medical professional liability insurance. Some of the bills identified are detailed here.

House Bill 1037 cross-filed as Senate Bill 1036: Task Force on the Creation of a Division of Returning Citizens and Expanded Reentry Services – Establishment. The bill includes a section specifically addressing housing services. Homeowners’ insurance may be required to secure housing. The Division submitted written testimony in support of the bill with amendments. The Division advocated for amendments to the bill which resulted in the Attorney General or his designee and one representative of the Maryland Equitable Justice Collaborative, recommended by the cochairs of the Maryland Equitable Justice Collaborative be included as members of the task force. The legislature passed the bill and Governor Wes Moore signed it into law.

House Bill 1283- Insurance – Discrimination – Sexual Orientation and Gender Identity. The bill sought to prohibit discrimination based on an individual's sexual orientation or gender identity by an insurer, an insurance producer, a surety insurer, and a health network when engaging in certain insurance-related business practices, including the homeowners and medical professional liability lines of insurance. The Division submitted written testimony in support of the bill. The bill did not receive a vote in the House Economic Matters Committee.

E. Division Review of Section 27-1001 Complaints

In 2007, the General Assembly amended the Insurance Article to provide policyholders a procedure for review when they believe their insurer has not acted in good faith. The provisions, codified in Section 27-1001 of the Insurance Article,²³ and accompanying regulations,²⁴ require a policyholder to file a complaint with the MIA, with supporting documentation, stating the facts underlying the allegation that the insurer failed to act in good faith. This procedure is only available to a policyholder. Injured third parties--*e.g.*, a neighbor with damage to their home—may not file under Section 27-1001.²⁵ The Division reviewed decisions in six (6) consumer-generated complaints of lack of good faith on a homeowners insurance matter under Section 27-1001. Five

²³ Md. Code Ann., Ins. Art. § 27-1001.

²⁴ COMAR 31.08.11.

²⁵ As an alternative to filing under Section 27-1001, consumers may file a regular complaint with MIA alleging that an insurer has failed to act in good faith. The list of unfair claim settlement practices in Section 27-303 was amended in 2007 to add “fail to act in good faith.” Like Section 27-1001, an insurer can be found in violation of failing to act in good faith when the consumer who makes the allegation is the policyholder of that insurer (first party claims). An insurer cannot be held in violation of the law for failing to act in good faith if the person who suffered a loss and filed a claim is not the policyholder of the insurer (a third-party claim).

of the decisions found no violation by the insurer; one decision found a partial violation by the insurer.

IV. INVESTIGATIONS

The Division investigated 190 matters. The Division investigations may include matters raised in filings, complaints, or consumer calls. Investigations are commenced when the Division identifies an issue in an insurance complaint that potentially affects a broad number of consumers or requires a more in-depth review of a consumer complaint. These investigations are usually prompted by contact from the consumer who filed the complaint, but sometimes arise from consumers who contact the Division before a complaint is filed with the MIA. Additionally, a few investigations are commenced from a pattern or practice noted by the Division following review of numerous determination letters from particular insurance companies.

Investigations are more intensive than many of the Division's other consumer-assistance practices, such as responding to complainants' inquiries about MIA complaint and hearing practices. For example, investigations often require Division personnel to obtain MIA investigative files, request additional documents from insurers, conduct interviews and do additional background and legal research in order to fully assess an MIA decision's impact on consumers.

The Division investigated 79 allegations raised in determination letters and four (4) prompted by cold calls by consumers directly to the Division. As part of a more in-depth review of a consumer complaint, the Division routinely makes public information act requests (PIA) to MIA to obtain the investigative file of consumer complaint. PIA files often contain a substantial number of documents concerning the issues raised in the complaint. The files routinely contain the consumer's complaints, the company's response (may exclude confidential documents), and MIA's determination and related documents. The Division reviews the files to better understand the issues raised by the consumer and the insurance companies' actions. The Division conducted extensive investigation into cases involving resolution of claims, non-renewals of policies and cancellation of policies. The Division also monitored several matters in which a homeowner requested an administrative hearing and responded to inquiries by the homeowners concerning the administrative hearing.

In addition, as indicated previously, the Division has several continuing projects regarding homeowners insurance practices affecting consumers. Age of insured and marital status rating factors, coverage or exclusions from coverage concerning communicable disease, virtual currency, cannabis and dog breeds, and availability of flood endorsements are some of the continuing projects. Additionally, the Division is reviewing insurance companies' definitions of "ineligible persons" and its impact on returning citizens. Insurance Article §27-501 allows an insurer to discriminate without statistical validation against individuals seeking homeowners insurance who have a conviction for arson within the preceding five years or conviction of a crime which directly increases the hazard insured against within the preceding three years. Insurance Article §27-501(j)(iv).

Finally, the Division considers in-depth reviews of rate filings by the Division's consulting actuaries to be investigations. Actuarial consultants reviewed 63 new filings, plus an additional 20 filing investigations for filings that were initially sent to the actuarial consultants in previous years. The Division reviews all filings and when necessary, the Division may contact the insurance company or contact MIA directly, rather than refer the matter to a consulting actuary. The Division's actuary analyst investigator provided an in-depth review of an additional 44 new rate filings.

As noted previously in this report, the Division's actuaries routinely contact companies regarding the insufficiency of the actuarial bases for their filings or apparent errors in calculations. In the vast majority of cases, the companies supply the Division with additional and/or corrected information sufficient for the Division's actuaries to do a complete analysis of the filing. Of note, in one filing the insurer initially proposed an overall base rate increase for its homeowners' policies (HO3 homeowners, HO4 renters and HO6 condominiums) of 17.4%, it was revised to 7.7%. On another filing, the insurer had initially proposed an overall base rate increase for its renters' policies (HO4) of 17.15%, it was revised to 11.53%. The Division has several long-term investigations as noted above. If needed, one of the Division's consulting actuaries is available to assist the Division in assessing whether these factors generate rates that are unfairly discriminatory in violation of Maryland's insurance laws.

V. CONSUMER ASSISTANCE EFFORTS

The Division has determined that there is a benefit to Maryland consumers for the Division to participate in consumer events as well as developing educational materials posted on its webpage. The Division's webpage includes a translation function for its web materials allowing consumers to access the information in a significant number of languages. The Division has available brochures in English and Spanish for its in-person outreach events and the Division's webpage has a translate function available for many other languages. The Division sent letters to city, town, county and state elected officials concerning the Division's mission. The Division responded to elected officials' consumer referrals and provided the Division's brochures.

The Division engaged in outreach events in partnership with local libraries, senior centers, and large new homeowners' events. The Division interacted with numerous consumers providing informative brochures, referrals to other state agencies, and when needed provided follow-up information about their concerns. The Division noted that the library systems and senior centers are welcoming community centers for the counties' diverse residents. The Division has noted in its review of complaints that some consumers' claims are denied due to the insurers' determination that the loss was due to wear, tear, and deterioration of the property. Also, consumers have had their insurance non-renewed or cancelled due to the condition of their property. The Division participated in an event that assisted elderly and low-income citizens make repairs to their homes providing an opportunity to engage with consumers and provide information concerning the Division's mission. The Division is committed to providing outreach throughout the state. The Division is committed to consumer outreach including in person events that will provide information to consumers and provide consumers with an opportunity to provide feedback to the Division.

The Division has continued dialogue with MIA representatives to better represent consumer interests. This has resulted in the Division's increased referral of consumers to the Rapid Response Program for claims resolution and to MIA's programming including educational series such as Lunch with MIA. The Division worked collaboratively with several other governmental agencies to assist consumers.

VI. CURRENT ACTIVITIES

The Division has several goals for the present fiscal year::

- Continue to monitor insurer filings to ensure thorough review and meaningful feedback to the MIA to protect consumer interests.
- Review and advocate for consumer interests in proposed bills filed in the legislative session, and advocate for the legislation proposed by the Division.
- Continue to examine issues of policy availability for policyholders, including potential barriers.
- Monitor trends and issues facing homeowners insurance and medical professional liability insurance policyholders.
- Engage in consumer outreach to provide educational materials and to obtain feedback from consumers in multiple forums across the state of Maryland.
- Produce additional educational materials and add specific information on topics relating to homeowners insurance to the Division's website.
- Continue to examine factors used by insurers in homeowners' insurance ratemaking and coverage.
- Monitor the impact climate change has on the availability, scope, and coverage of homeowner's insurance for Maryland consumers and provide information to Maryland homeowners insurance consumers.

VII. CONCLUSION

The Division will continue its efforts to advocate on behalf of consumers regarding homeowners insurance and medical professional liability insurance matters pending before the MIA. The Division will continue its review of all insurance filings evaluating any impact on consumers. As in past years, the Division will represent consumer interests before the House and Senate committees, reviewing insurance bills and supporting legislation that will protect consumer interests. The Division will continue to engage in state-wide consumer outreach.