

MAINE STATE LEGISLATURE

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MAINE DEPARTMENT OF
**Professional
& Financial
Regulation**

**ANNUAL REPORT FROM THE SUPERINTENDENT OF INSURANCE
TO THE LEGISLATURE**

January 2005 through December 2005

**PREPARED BY THE STAFF OF
THE MAINE BUREAU OF INSURANCE**

JOHN ELIAS BALDACCI
GOVERNOR

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SUPERINTENDENT

Preface

Some of the more significant Bureau of Insurance accomplishments for calendar year 2005 include a major enforcement action, new outreach initiatives, and the implantation of electronic licensing procedures designed to achieve additional regulatory uniformity among the states.

Enforcement Actions

In 2005 the Bureau fined Bankers Life and Casualty Company of Illinois \$400,000 for failing to provide adequate training and supervision for its appointed producers in the South Portland and Bangor branch sales offices. The fine resulted from an investigation into consumer complaints against Bankers' producers alleging policy misrepresentation; making false statements regarding Banker's financial condition; and making deceptive or misleading representations in the sale of life, annuities, and health insurance. In addition to the fine, Bankers Life agreed to an extensive corrective and preventative training plan for its producers. The terms of the agreement also require that Bankers must meet quarterly with the Bureau to ensure compliance with the agreement. In addition to the fine, Bankers was directed to invest \$100,000 in organizations and initiatives that benefit Maine's senior citizens.

Total fines generated through enforcement action and consent agreements was \$456,800 in 2005. This figure includes fines against insurance companies, producers, and agencies. Restitution to consumers totaled \$3,992,727 which is illustrated by division in the graphs in Appendix B, pages 19 & 23.

Licensing Initiatives

In February 2005, Maine began accepting electronic applications for non-resident producer and non-resident business entities through the National Insurance Producer Registry's Producer Information Network. Electronic non-resident licensing gives business entities and individuals who wish to become licensed as non-resident producers, the ability to file for several non-resident licenses in various states through one transmission. Since inception of the system in February 2005, the Bureau has issued 6,016 licenses through electronic processing. This process is part of the NAIC's (National Association of Insurance Commissioners) initiative to standardize various areas of regulation among the states to improve timeliness of approval and review in areas such as insurance products, licensing, solvency regulation, and market regulation.

Outreach Initiatives

In a continuing effort to reach more consumers to make them aware that the Bureau of Insurance is available for assistance, Bureau staff participated in the Common Ground Country Fair held September 23 through September 25. The Bureau staffed a booth on all three days to answer insurance related questions and distribute insurance brochures. Pedestrian traffic at the booth was heavy on all three days.

The workers compensation work unit sponsored three one-day seminars to educate agents and employers on workers compensation coverage and law. Sessions were held in South Portland, Gardiner, and Orono. Approximately 70 people attended.

In 2005, two new consumer brochures were developed and distributed: "Insuring Your Farm" and "Insuring Your Business," which cover the basics of property & liability coverage. A number of brochures were mailed to the Maine Organic Farmers Association for distribution at a membership seminar. Positive feedback has been received from both consumers and producers about the helpfulness of the brochures in explaining the coinsurance clause contained in insurance policies.

The Bureau participated in a number of outreach initiatives after the federal government's implementation of the new Medicare Part D prescription drug coverage. The purpose of these outreach initiatives was to help seniors understand their coverage options. In November, the Bureau issued Bulletin #340 advising agents and insurers of the federal guidelines and state licensing requirements that must be followed when selling and marketing the new Medicare Part D and Medicare Advantage plans. Staff also taped a question and answer segment on the new plans for Mature Lifestyles which is scheduled for broadcast on the local Adelphia channel in the spring. The Bureau's Medicare Supplement comparison brochure was updated to include information on the new Part D, a summary sheet of upcoming changes was completed. Both pieces of information are posted on the Bureau web-site. Staff, using the developed information, met with the Maine Medicare Working Group.

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Work-Units in the Bureau (see Appendix A for Bureau organizational chart and key personnel)

Administration

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Consumer Health Care

Financial Examination

Licensing

Life & Health Actuarial

Market Conduct

Property & Casualty Actuarial

Property & Casualty Technical Services

Support

Workers' Compensation

Financial Examination

The Financial Examination work unit conducts detailed financial examinations of insurers domiciled in the State of Maine every three to five years. The work unit consists of a Director, two Examiners-in-Charge, three Senior Examiners, and four Examiners. Personnel are divided into two examination teams in order to conduct examinations concurrently. Exam reports for domestic insurers who have had an examination report issued can be found on the Bureau web site www.MaineInsuranceReg.org at www.state.me.us/pfr/ins/domestic.htm. Financial statements for Maine licensed HMOs may also be accessed from the Bureau web site at www.state.me.us/pfr/ins/inshmo.htm.

Recent examinations by the work unit:

<i>Company</i>	<i>Report Issued</i>	<i>Company</i>	<i>Report Issued</i>
Acadia Insurance Company	Pending	Maine Partners Health Plans of Maine	April 15, 2005
Aetna Health Inc. (ME)	August 25, 2005	Medomak Mutual Fire Insurance Co	Pending
Anthem Health Plans of Maine	April 15, 2005	North East Insurance Company	Pending
Casco Indemnity Company	Pending	North Yarmouth Cumberland Mutual Fire	March 17, 2005
Chesapeake Bay P&C Insurance Co	Pending	Patriot Life Insurance Company	March 4, 2005
Danville Mutual Fire Insurance Co	April 13, 2005	Patriot Mutual Insurance Company (<i>full exam</i>)	March 4, 2005
Delta Dental Plans of Maine	Pending	Patriot Mutual Insurance Company (<i>limited</i>)	August 26, 2005
Farmington Mutual Fire Insurance Co	March 29, 2005	Patrons Oxford Insurance Company	Pending
Gorham Farmers Club	April 13, 2005	State Mutual Insurance Company	June 22, 2005
Jefferson Farmers Club	Pending	Warren Farmers Mutual Insurance Co	Pending
Maine Bonding & Casualty Company	December 1, 2005	York Insurance Company of Maine	July 26, 2005

The schedule of upcoming financial examinations in 2006:

<i>Company</i>	<i>Financial Period Ending</i>
Cigna Healthcare of Maine, Inc.	December 31, 2005
Maine Employers Mutual Insurance Company	December 31, 2005
Medical Mutual Insurance Company	December 31, 2005
UNUM Life Insurance Company	December 31, 2005

Financial Analysis and Alternative Risk Markets

The Financial Analysis and Alternative Risk Markets work units are responsible for monitoring the financial solvency of insurers transacting business in Maine. Insurance companies seeking licensure and new workers' compensation self-insurers submit financial and operational information for review. Analysts review the information and make recommendations for insurance authority based on the financial strength of the company.

For new applicants, a full analysis of the financial statements is completed. Once the Bureau grants authority, the level of ongoing financial review is predicated on the entity's status as an insurance company or a workers' compensation self-insurer.

If the entity is an insurance company, the level of review is further determined by whether the company is a Maine domestic or a foreign insurer. Maine domestics are reviewed in detail on a quarterly basis; foreign insurers are prioritized based on select financial ratios.

For workers' compensation self-insured employers and groups, the work unit performs detailed annual reviews. Self-insurance authority is renewed annually unless evidence of deteriorated financial condition is found.

The Financial Analysis and Alternative Risk Markets work unit is also responsible for reviewing the following applicants: Health Maintenance Organizations, captive insurance companies, surplus lines companies, risk retention groups, risk purchasing groups, managing general agents, reinsurance intermediaries, accredited reinsurers, workers compensation reinsurers, fraternal benefit societies, third party administrators, multiple employer welfare arrangements, and continuing care retirement communities.

Number of Self-Insurers for Workers' Compensation	2005	2004	2003	2002
Individual Self-insurers	75	85	90	101
Group Self-insurers	20	20	20	19

Number of Insurance Companies Licensed in Maine

As of December 31, 2005, there were 1,016 licensed insurers in Maine.

Number of Insurance Companies Licensed in Maine	2005	2004	2003	2002
Property & Casualty Companies	629	575	574	563
Life & Health and HMOs	387	370	377	386
Fraternal Companies	14	13	13	13
Surplus Lines Companies	101	19	83	78
Private Purchasing Alliance	1	1	0	0
Multiple Employer Welfare Arrangement (MEWA)	3	3	3	0
Captive	0	0	0	1

Domestic Insurance Companies (Domiciled in Maine) 2004 (premium info for 2005 not available until April)

Maine Domestic	12/31/04 PREMIUM	12/31/04 ASSETS
Acadia Insurance Company	\$281,934,887	\$165,290,441
Aetna Health, Inc (a Maine corporation)	\$172,985,080	\$42,903,333
Allied Augusta Mutual Insurance Company	0	\$10,114
Anthem Health Plans of Me, Inc	\$840,804,642	\$400,623,995
Banc One Private Mortgage Insurance Company	0	\$47,205,336
Berkley Regional Specialty Insurance Company	0	\$22,073,510
Casco Indemnity Company	\$17,298,428	\$26,174,750
Cigna Healthcare of Maine, Inc	\$87,942,714	\$35,834,263
Maine Bonding & Casualty Company	\$435,793	\$25,222,413
Maine Dental Service Corp	\$48,122,645	\$18,621,227
Maine Employers' Mutual Insurance Company	\$156,603,310	\$501,096,229
Maine Partners Health Plan, Inc	\$96,200,508	\$45,058,095
Medical Mutual Insurance Company of Maine	\$49,807,548	\$157,718,865
MMG Insurance Company	\$94,380,782	\$130,552,306
North East Insurance Company	\$23,051,199	\$37,206,520
Patriot Life Insurance Company	\$3,306	\$6,617,145
Patriot Mutual Insurance Company	\$36,623,790	\$46,056,034
Patrons Oxford Insurance Company	\$31,137,557	\$13,749,818
Selective Insurance Company of New England	\$61,627	\$18,496,847
State Mutual Insurance Company	\$1,623,074	\$1,482,718
Unum Life Insurance Company of America	\$4,416,986,899	\$12,680,887,845
York Insurance Company of Maine	\$191,393,343	\$32,788,171

Non Maine Health Maintenance Organizations 2004

HMOs	(State of Domicile)	12/31/04 PREMIUM	12/31/04 ASSETS
Harvard Pilgrim Health Care, Inc.	(MA)	\$2,100,391,818 (Maine only)	\$600,061,151

New Company Licenses Issued in 2005

Companies/Insurers – 40 licenses issued in 2005

Fraternal	
Supreme Council of the Royal Arcanum	

Life and Health Insurance Companies	
American General Life and Accident Insurance Co American Public Life Insurance Company Dentegra Insurance Company Health Net Life Insurance Company HPHC Insurance Company Inc	Industrial- Alliance Pacific Life Insurance Company Madison National Life Insurance Company Securian Life Insurance Company Wellcare Prescription Insurance Inc Zale Life Insurance Company

HMOs	
Arcadian Health Plan Inc	

Property & Casualty Insurance Companies		
Atradius Trade Credit Insurance Inc Autoone Insurance Company Dealers Assurance Company Esurance Insurance Company Esurance Property and Casualty Ins Co Garrison Property and Casualty Ins Co	Homesite Insurance Co of the Midwest IDS Property Casualty Ins Company Nova Casualty Company Peninsula Insurance Company-The Quadrant Indemnity Company Tower Insurance Co of New York	Transnation Title Ins Co United General Title Ins Co United States Surety Company Western General Insurance Co Zale Indemnity Company

Eligible Surplus Lines Insurance Companies	
American Western Home Insurance Company Aspen Insurance UK Limited Aspen Specialty Insurance Company Axis Specialty Europe Limited Benchmark Insurance Company Crum & Forster Specialty Insurance Company	First Mercury Insurance Company Hudson Specialty Insurance Company Philadelphia Insurance Company Seneca Specialty Insurance Company Through Transport Mutual Insurance Assn (Eurasia) Ltd

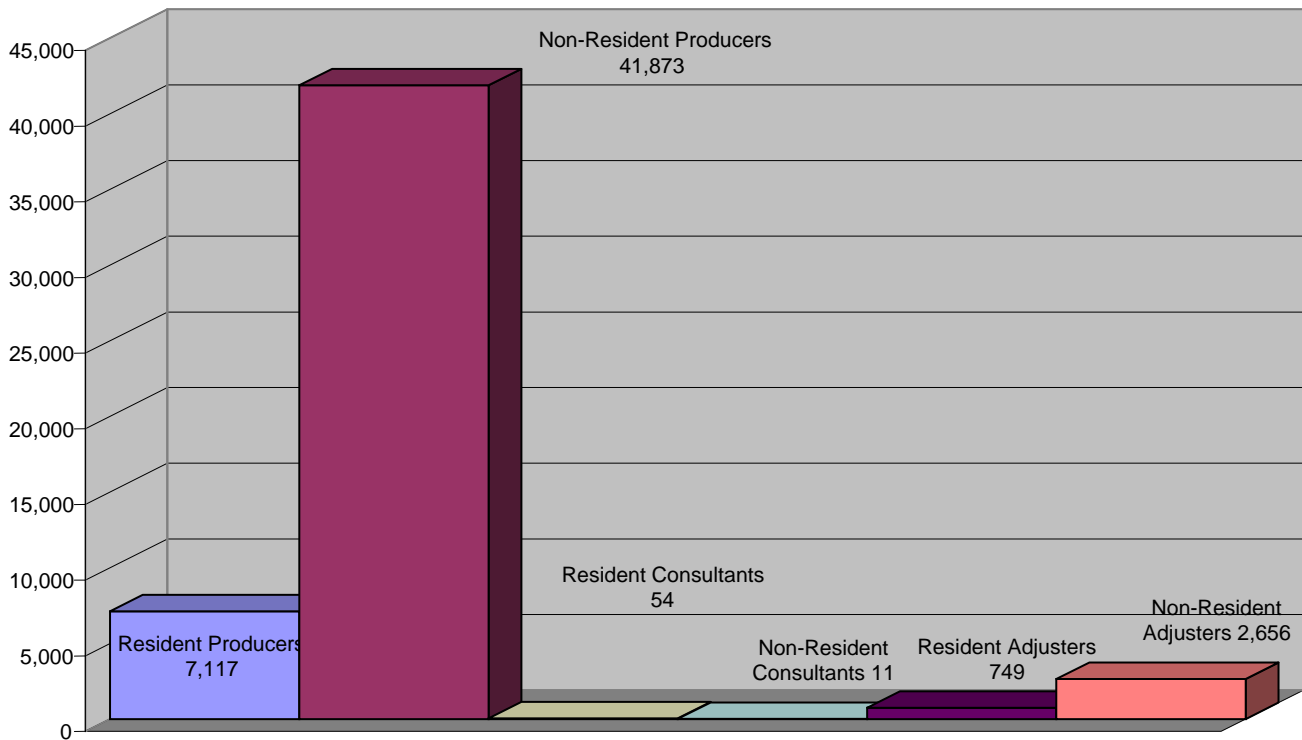
Producer Licensing

The Producer Licensing work unit is responsible for the review and approval of applications to license individual producers, consultants, adjusters, and business entities, and to register structured settlement transferees. Processing includes a determination if eligibility requirements have been met and verification that no statutory preclusions exist. The Unit's responsibilities also include the approval of continuing education courses submitted by education providers and monitoring completion of the education requirement of approximately 7,117 insurance professionals. Maine law requires that each resident producer and resident consultant complete 30 hours of continuing education every 2 years in order to maintain a license. Nonresidents must meet continuing education requirements in their resident state.

Electronic processing of producer appointments, appointment terminations, and non-resident license applications, as well as participation in the national producer database has made the licensing process more efficient, timely, and uniform.

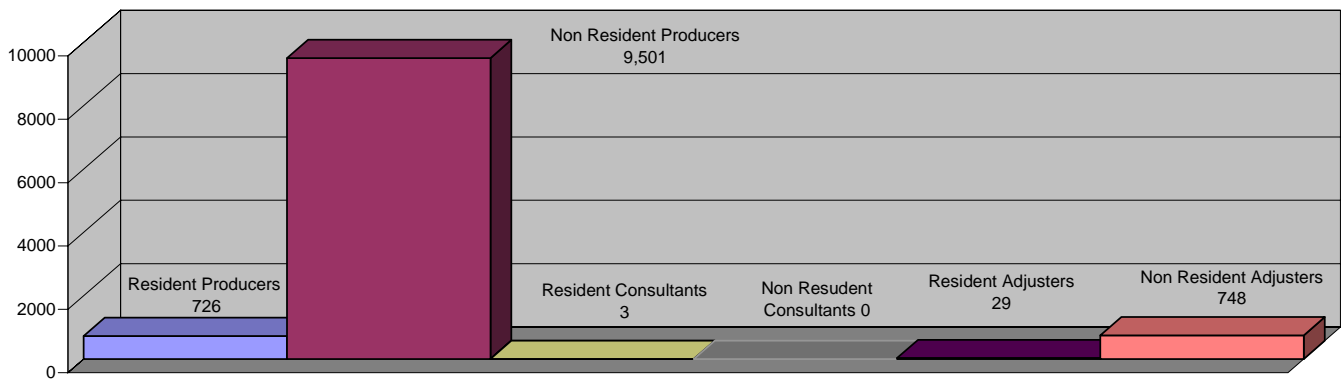
Producer Licensing Statistics

Active Individual Licenses as of December 31, 2005
Total - 52,460



(Prior Years: 2004 Total: 45,564; 2003 Total: 41,222)

New Licenses Issued to Individuals from January 1, 2005 through December 31, 2005
Total 11,007



(Prior Years: 2004 Total: 8,338; 2003 Total: 7,855)

Support Unit

The Support work unit provides administrative support for all functions within the Bureau of Insurance. Included in the administrative work are the following tasks: tracking legislation, records management, and tracking and processing invoices.

The Consumer Health Care Division

The Consumer Health Care Division (CHCD) is comprised of fourteen staff members who offer a wide range of services to consumers including providing information regarding life and health care plan options and services; helping enrollees to understand their rights and responsibilities under health care plans; giving assistance to enrollees with complaints related to life and health care plans; and promoting coordination between the Bureau and other organizations that assist consumers.

The CHCD is responsible for the review and approval of life and health insurance policy forms, monitoring health plan compliance with Maine law, and the investigation and resolution of life and health insurance complaints.

Staff participated in several outreach programs during 2005 to inform Maine citizens that the Bureau of Insurance is available to help them. Outreach also provides citizens with an opportunity to speak to staff on a one-to-one basis regarding questions or problems they may have concerning their life or health insurance coverage. In 2005, CHCD staff participated in the Bureau's booth at the Common Ground Country Fair.

The CHCD has been proactive in implementing the National Association of Insurance Commissioners (NAIC) speed to market initiative. Electronic filings were submitted via the System for Electronic Rate and Form Filings (SERFF) which is a nationwide system developed by the NAIC with input from states and the insurance industry. The focus of the CHCD is to encourage insurance companies to adopt SERFF and decrease the time for forms review submitted for approval. The average processing time for SERFF filings is 14 days. The average processing time for a submitted paper filing was approximately 15 days.

The CHCD focuses much of its efforts on analyzing the underlying issues that often give rise to complaints. Identification of deficiencies in insurer processes provides an opportunity for the Bureau to work with health plans to prevent reoccurrence of identified problems. The CHCD investigates complex complaints involving adverse determinations of medical necessity and speaks regularly with health care providers and the insurance carrier utilization review staff.

Throughout the year, the staff of CHCD speaks to various groups ranging from consumer and health care provider advocacy organizations to health underwriters.

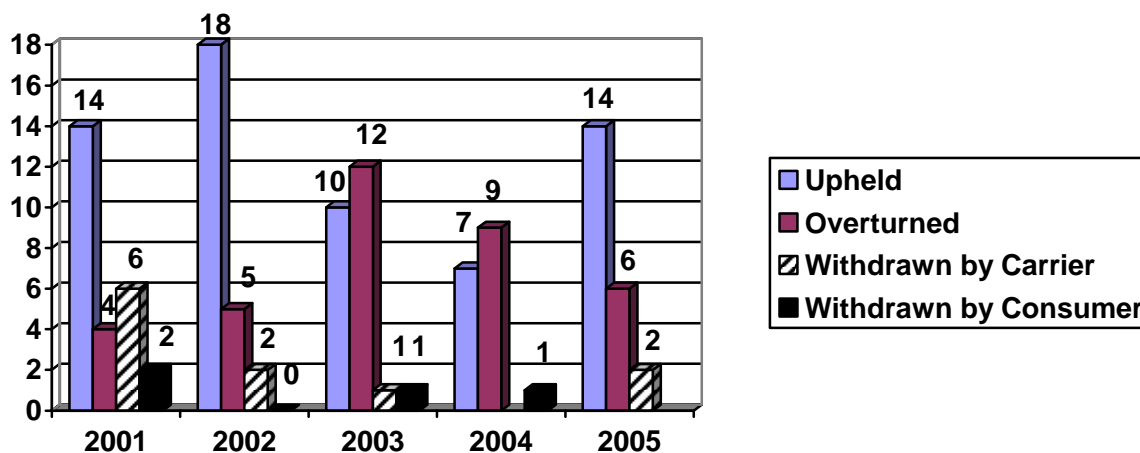
Consumer Health Care also processes external reviews. Consumers may be entitled to an external review to resolve a dispute that involves medical issues with an insurance company. An external review is an additional step in the appeals process after the insurance company denies payment for a health insurance claim. The Bureau processed 22 qualified requests for external review during 2005. Of these cases, six (27%) were completely overturned (the carrier's original decision to deny coverage was entirely reversed), and fourteen (64%) upheld the carrier's decision. Two requests for an external review were withdrawn by the carrier before the external review was conducted.

Additional requests for external review were received that did not qualify as eligible under the statute, either because the denial was based on issues other than validity of the carrier's medical decisions or the policy was self-funded and therefore did not qualify for review under Maine law.

Figure 2 illustrates the number of external reviews that were overturned, upheld, or withdrawn by either the carrier or consumer prior to the review for the years 2001, 2002, 2003, 2004, and 2005.

Figure 2.

External Review Outcomes by Year



Consumer Health Care Division - Totals *	2005	2004	2003
Consumer complaints received	580	636	671
Consumer inquiries/phone calls received	6,498	7,363	6,479
Restitution to consumers (in the form of health claims paid, or money returned)	\$3,435,037.00	\$1,562,235.20	\$4,173,928.50
Rate and form filings	4,659	7,378	2,145

*See graphs in Appendix B for a comparison of the last four years.

Life & Health Actuarial

The Life & Health Actuarial work unit provides actuarial and technical services to Bureau staff involving life and health insurance. Examples of tasks performed by the unit include:

- Reviews and takes appropriate action on rate filings for regulated lines of insurance, primarily individual health, small group medical, credit life and health, group and individual Medicare supplement, and long-term care.
- Provides reserve analysis of life and health insurance companies as required by Maine law.
- Provides technical assistance to insureds, consumers, other state agencies, and others on insurance matters.
- Prepares annual reports on mandated benefits claims experience.
- Prepares quarterly “market snapshots” for the small group and individual health insurance markets.
- Maintains database of required reports on small group and individual health insurance.
- Maintains database of claims paid by third-party administrators and by insurers administering employers’ self-funded health plans.
- Compiles supplemental annual reports from health insurers.
- Studies proposed mandated benefit legislation as requested by the Legislature to determine the social impact, the financial impact, and the medical efficacy of the proposed mandate.
- Estimates the impact on health insurance premiums of proposed expansions of health care services requiring a certificate of need (“CON”) from the Maine Department of Health and Human Services.

In accordance with Title 24-A M.R.S.A. §2837-A, §2840-A, and §2843 the Bureau is responsible for issuing an annual report to the Legislature regarding selected *Mandated Benefits*, specifically mental health, substance abuse, chiropractic, and mammography. This report compares the amount of claims paid for mandated benefits to the total amount of health claims paid.

These reports are available on the Bureau’s web site at www.MaineInsuranceReg.org under *Bureau Reports*.

Property & Casualty and Workers Compensation

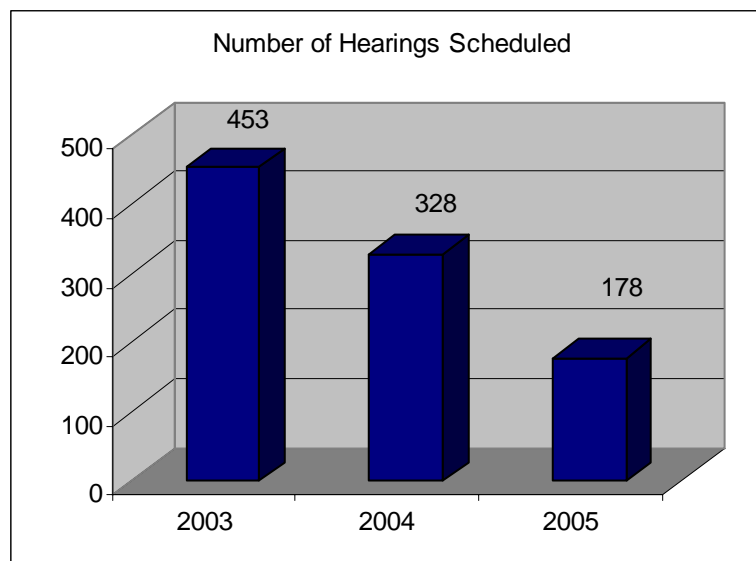
The Property & Casualty work unit reviews and approves rates, rating rules, and policy forms that property and casualty insurance companies and advisory organizations file for products they intend to write in Maine. Filings are reviewed to ensure compliance with applicable Maine law.

The unit also investigates complaints for all lines of property and casualty insurance. Often this includes conducting administrative hearings when a consumer has their automobile or homeowner’s policy canceled or non-renewed.

Property & Casualty Totals *	2005	2004	2003
Consumer complaints received	659	882	1,006
Consumer complaints closed	657	977	888
Consumer inquiries/phone calls received	8,233	8,538	10,443
Amount of restitution to consumers	\$557,690	\$531,603	\$963,550
Rate and form filings	3,095	3,159	3,555

*See graphs in Appendix B for a comparison of the last four years.

Hearings: When an insurance company issues a notice of cancellation or nonrenewal of a homeowner or auto policy, the company is required to advise the insured that they may request a hearing to contest the action. The hearing provides a forum to dispute the reason (s) and requires the Bureau to rule whether the cancellation or nonrenewal was done in accordance with Maine law.



Hearing Results	2005	2004	2003
Number of Decisions Issued	84	212	215
Findings for the Consumer	49	94	129

The Workers' Compensation work unit is a sub-unit within the Property & Casualty unit. Workers' Compensation staff members are responsible for processing all rate, rule, and form filings presented to the Bureau involving workers compensation insurance, self-insurance reinsurance, and occupational disability policies. In addition to these filings, the work unit assists the actuarial staff with the workers' compensation loss cost filing.

The unit responds to general inquiries regarding workers' compensation premiums and policies and handles complaints regarding workers' compensation insurance rates, rules, and policy cancellations. Complaints regarding specific workers' compensation claims are under the jurisdiction of the Workers' Compensation Board, however, if the Workers' Compensation Board finds a pattern of abuse, it can refer the matter to the Bureau of Insurance.

Property & Casualty Actuarial

The Property/Casualty Actuarial work unit provides actuarial and technical services to the Bureau staff for property and casualty lines of insurance. Examples of tasks performed by the work unit include:

- Reviews rate and rating rule filings for market leaders.
- Reviews and analyzes loss cost filings by industry advisory organizations that gather experience and file the advisory loss portion to be used by insurers in establishing rates and rating rules.
- Provides technical assistance to insureds, consumers, other state agencies, and others on insurance related matters.
- Reviews funding and reserves of workers' compensation self-insurance trusts.
- Provides reserve analysis of property/casualty insurance companies.
- Provides technical assistance to the Superintendent in all aspects of workers' compensation matters.
- Provides technical assistance to the Superintendent in all aspects of casualty, property, and workers' compensation matters.

Market Conduct

The Market Conduct work unit is responsible for establishing and monitoring a compliance program for all licensees. This program includes both in-house analysis and on-site examination of licensees. The examination process typically focuses on the following areas: (1) company operations/management; (2) complaint handling; (3) marketing and sales; (4) producer licensing; (5) policyholder service; (6) underwriting; (7) claims. While the Unit does not handle individual complaints, it does use complaint data and information to analyze licensee trends and business practices or patterns. This analysis is often a key factor in selection for the on-site examination process.

Recent examinations by the work unit:

Company	Type of Examination	Report Issued
Aetna US Healthcare, Inc	Targeted, Limited in Scope	August 24, 2005
Harvard Community Health Plan, Inc	Targeted, Limited in Scope	April 21, 2005

Current examinations in process:

Company	Type of Examination
St. Paul/Travelers	Targeted, Limited in Scope
Gates & McDonald Company, Inc	Targeted, Limited in Scope

Bureau Publications

To help educate the public on insurance matters that can affect their daily lives, the Bureau publishes, distributes, and posts a number of consumer brochures.

The following brochures are available from the Bureau. Most brochures, with the exception of the federal guide, are available on-line at the Bureau's web site (www.MaineInsuranceReg.org):

- Automobile Insurance Guide (*premium comparison*)
- Complaint Ratio Brochures for Auto, Homeowners, and Health Insurance
- Consumer Guide to Cancellation/Nonrenewal of Personal Auto & Property Insurance
- Consumer Guide to Homeowners' Insurance (*premium comparison*)
- Consumer Guide to Day Care Liability
- Consumer's Guide to Understanding How Insurers Use Credit Information for Personal Auto and Homeowners Insurance
- Consumer Guide to Youthful Drivers
- Consumer Health Care Division
- Guide to Individual Health Insurance (*premium comparison*)
- Insuring your Business – The Basics of Property & Liability Coverage
- Insuring your Farm – The Basics of Property & Liability Coverage
- Long Term Care Comparison Chart (*premium comparison*)
- Medicare Supplement Comparison Chart (*premium comparison*)
- Guide to People with Medicare (Federal Publication – not available on-line)
- Resolving Health Care Insurance Disputes (Internet only)
- What Maine Small Employers Should Know About Health Insurance (*premium comparison*)
- What Can I do if I Lose my Group Health Insurance?
- Workers' Compensation Brochure (*premium information*)

Bureau Web Site

In an effort to provide the public and our regulated entities with information in a convenient and timely format, the Bureau maintains a web site at www.MaineInsuranceReg.org. The site has been recognized for the valuable information it provides.

A sample of the information on the web site includes the following:

Recent News Box – provides links to:

- Press Releases
- Bureau Reports
- Find a Licensee
- Maine Fraud and Abuse Reporting Form
- Dirigo Health information
- UNUMProvident settlement information
- Electronic health claims submission

Consumer Information

- How to File a Complaint
- Complaint Form Instructions
- Electronic and Printed Complaint Forms
- On-line Consumer Brochures

Laws, Rules, Decisions

- Laws, Rules, Proposed Legislation & Proposed Rules, Bulletins
- Decisions of the Superintendent
- Consent Agreements, Hearing Decisions, Cancellation/Nonrenewal Hearing Decisions, Orders, Letters of Reprimand

Insurance Company Information

- Domestic Companies with the Latest Exam Report Dates
- List of Licensed HMOs
- Workers' Compensation Writers
- Fee schedules
- Forms

Producer/Business Entity Information

- Approved Continuing Education Vendor List
- Changes in Continuing Education Requirements
- Fee Schedule
- Licensing Forms/Applications
- List of Licensed Medical Utilization Review Entities
- List of Registered Employee Leasing Companies
- List of Licensed Preferred Provider Organizations

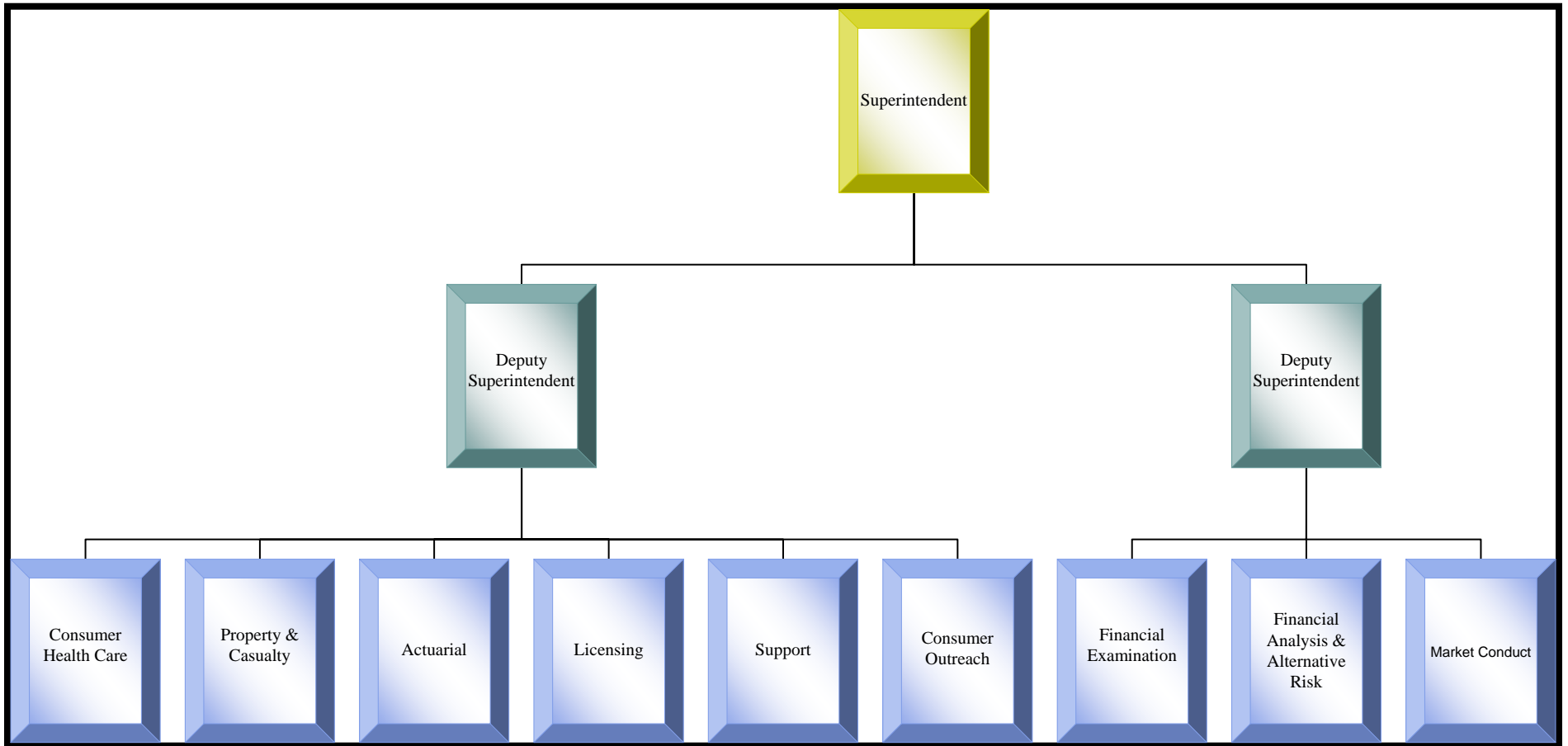
Hearing Schedule**Frequently Asked Questions/Glossary of Insurance Terms**

Some Related Links That Can Be Accessed from the Bureau's Home Page

- National Association of Insurance Commissioners (NAIC)
- Maine Legislature
- FEMA
- Health Insurance Association of America
- A.M. Best Company
- Insurance related organizations
- Medicare

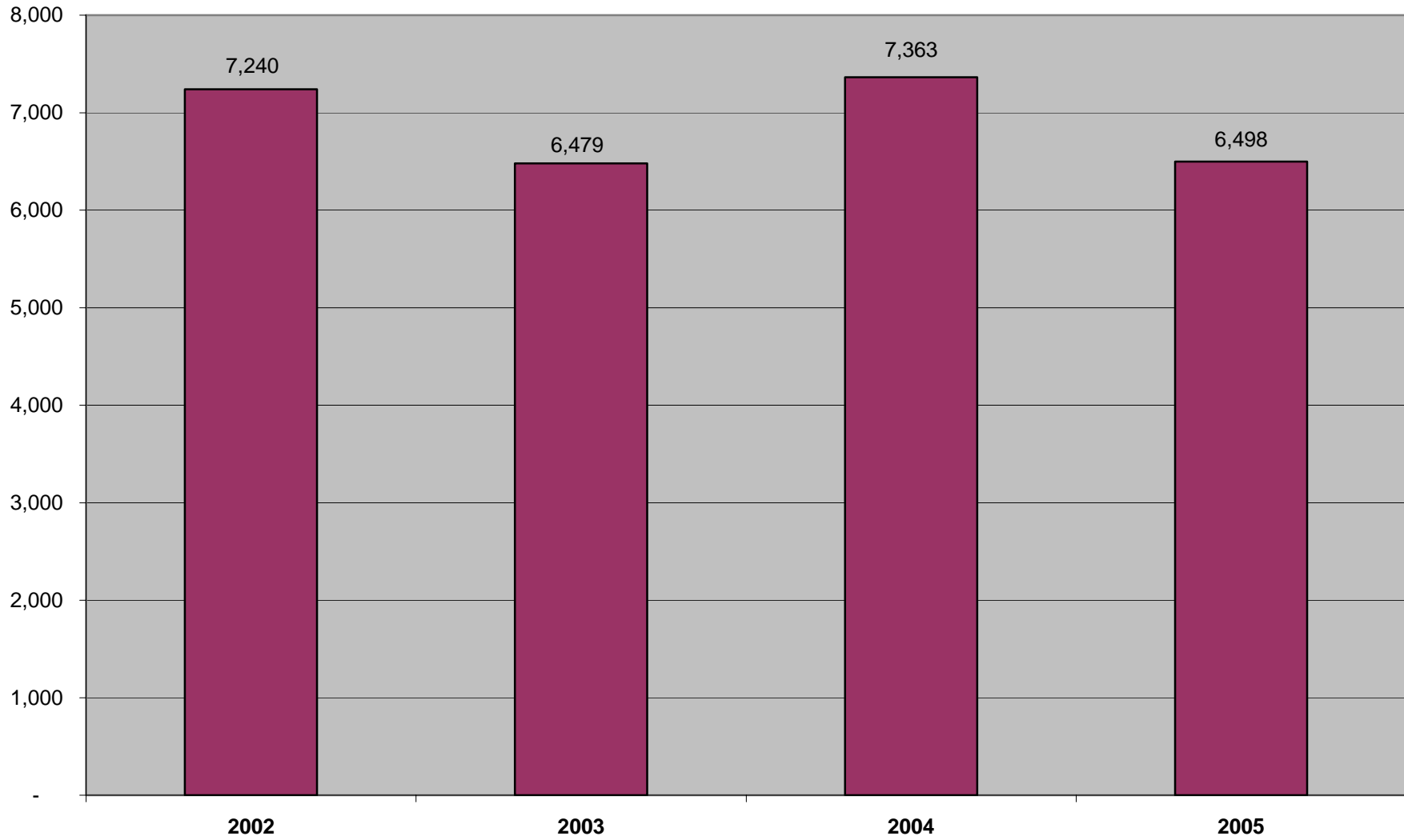
APPENDIX A

Bureau of Insurance Organization Chart

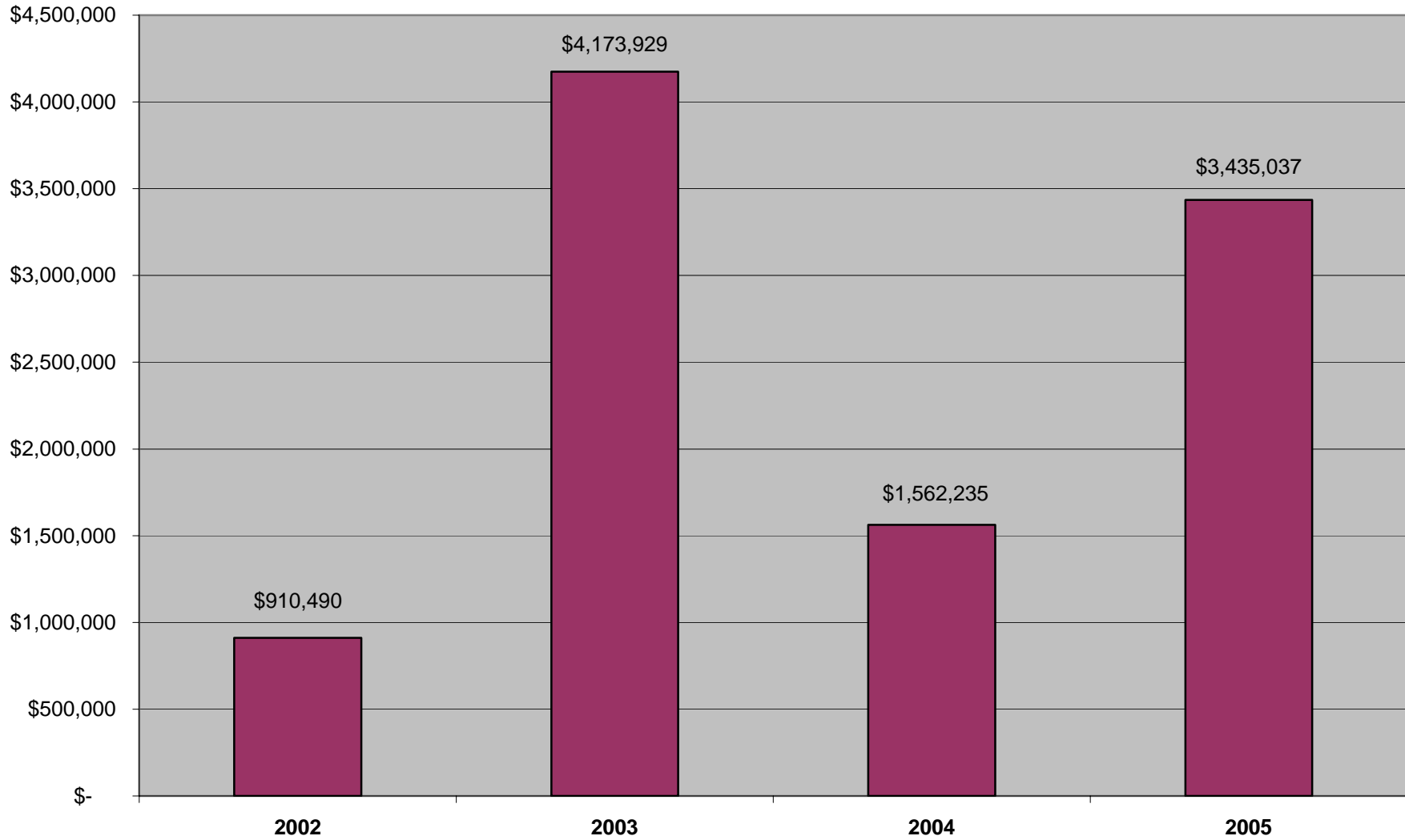


APPENDIX B

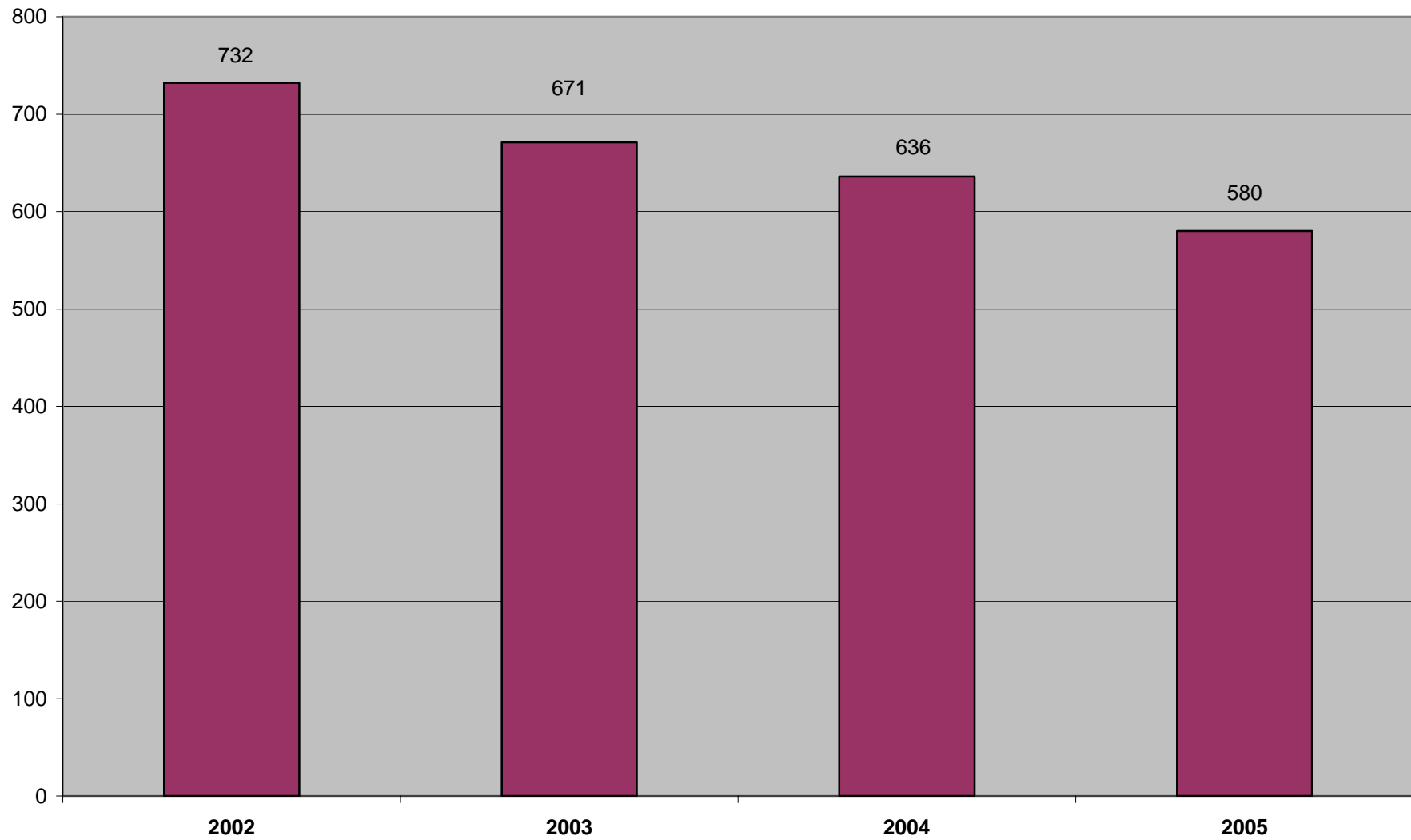
Consumer Health Care Inquiries/Calls for the Years 2002-2005



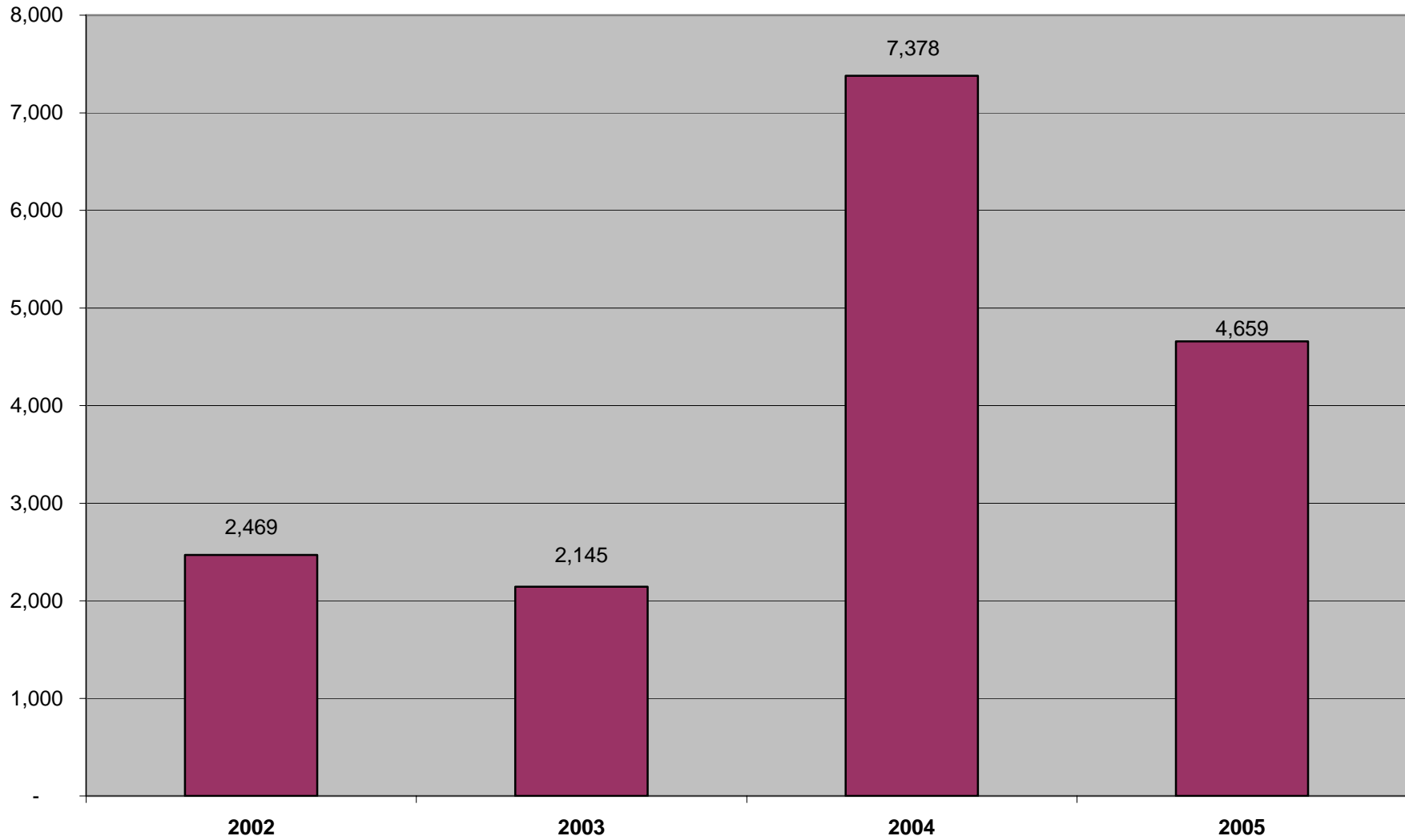
Consumer Health Care Restitution for the Years 2002-2005



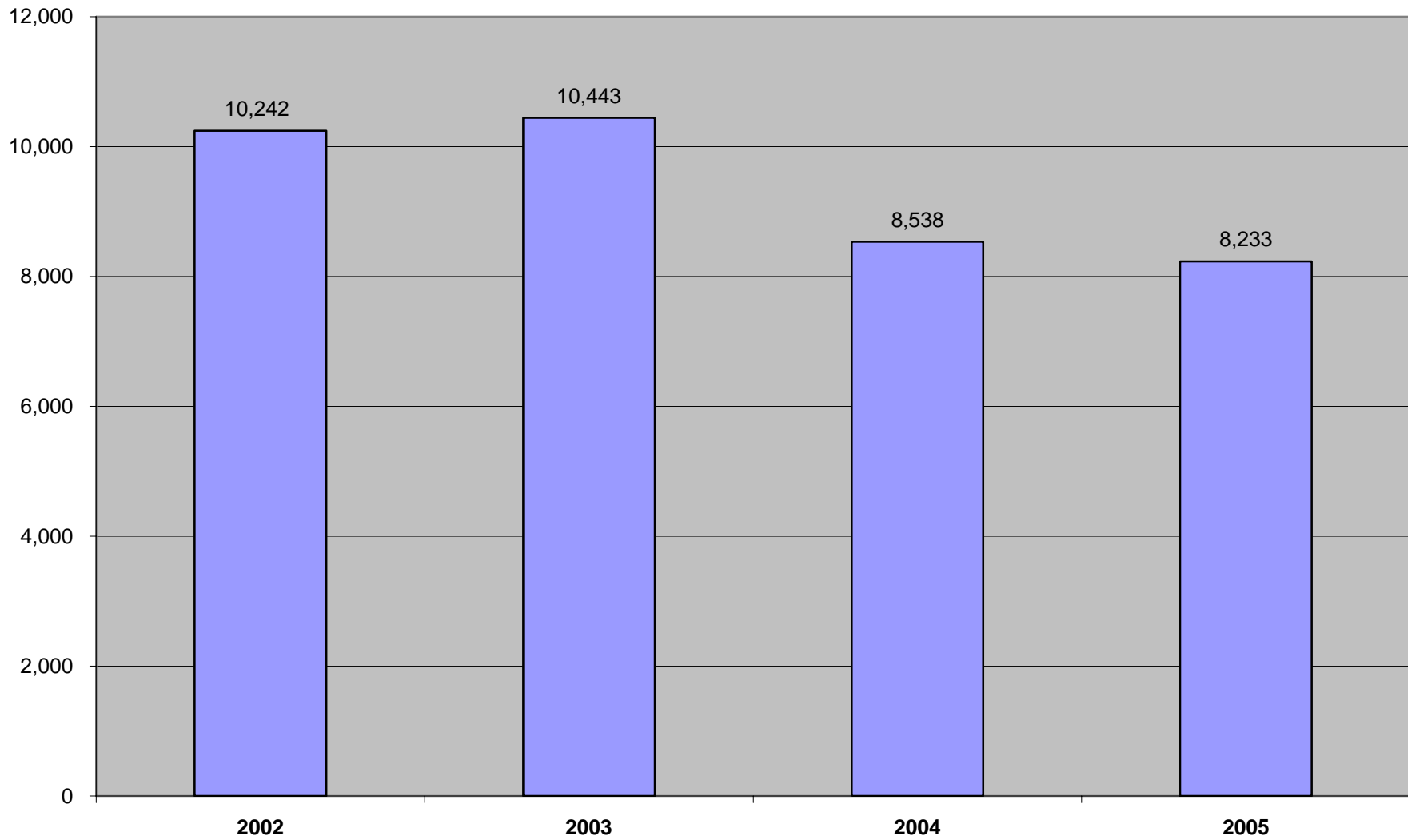
Consumer Health Care Complaints for the Years 2002 - 2005



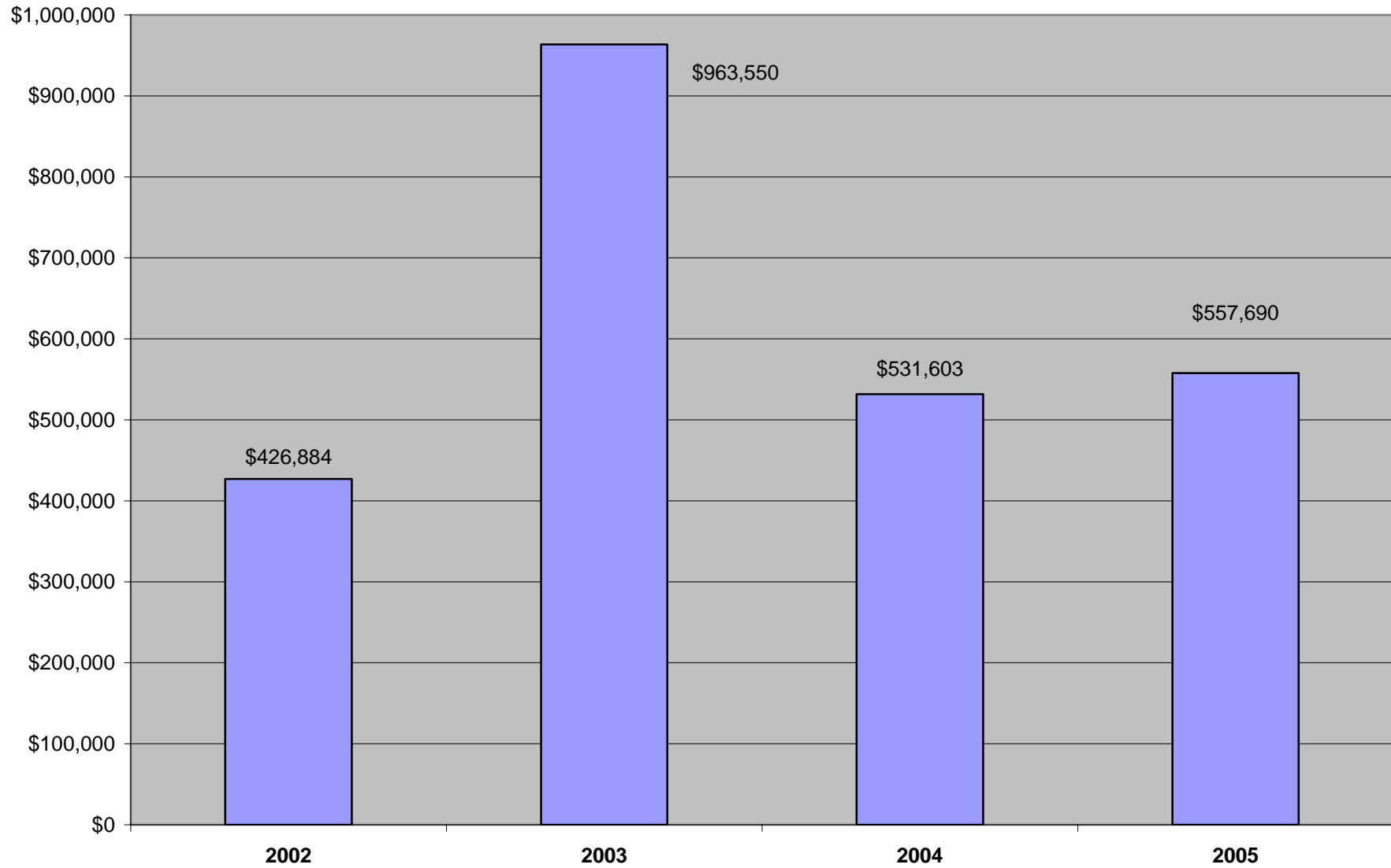
Consumer Health Care Rate and Form Filings for the Years 2002-2005



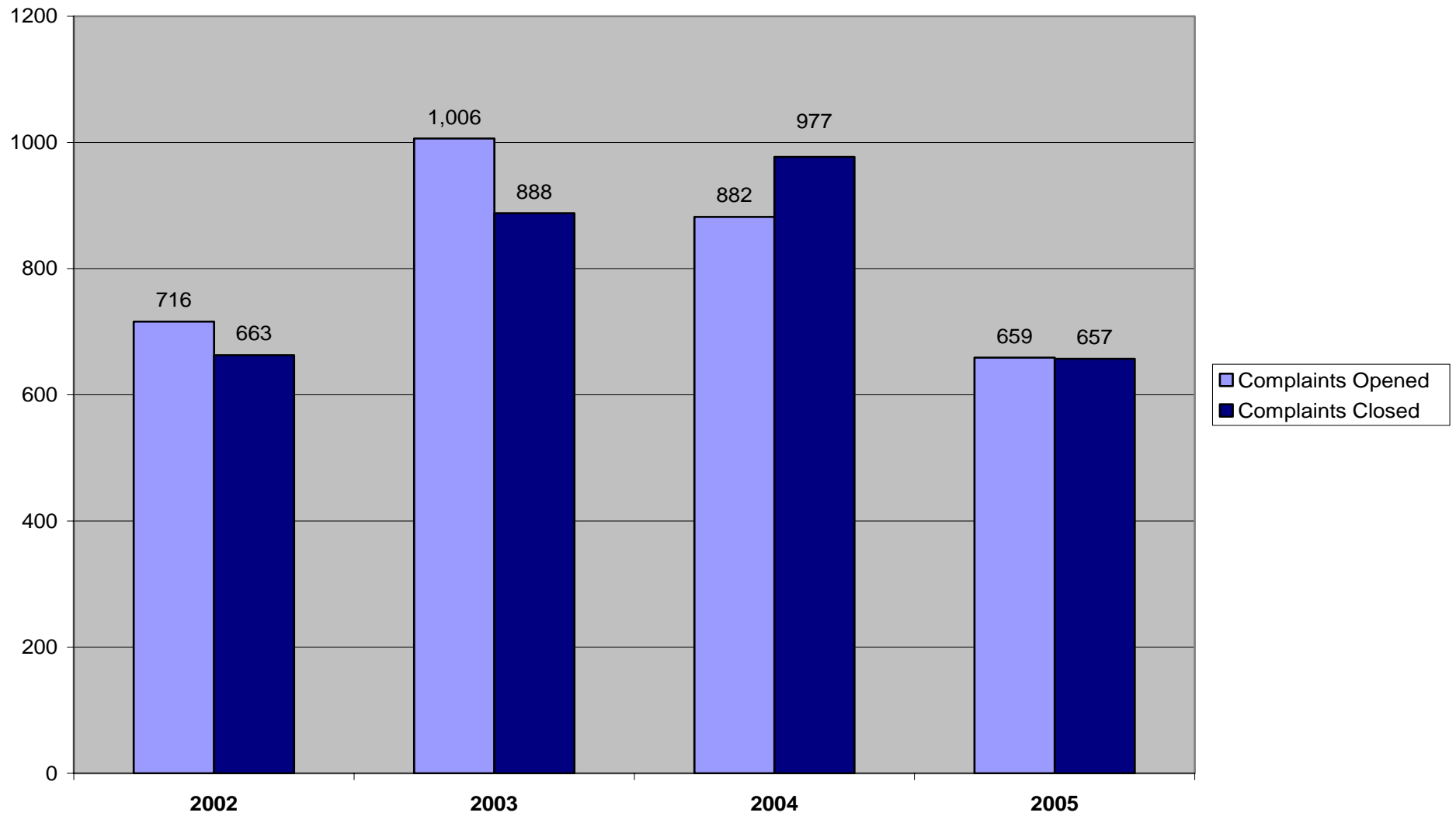
Property & Casualty Inquiries/Calls for the Years 2002 - 2005



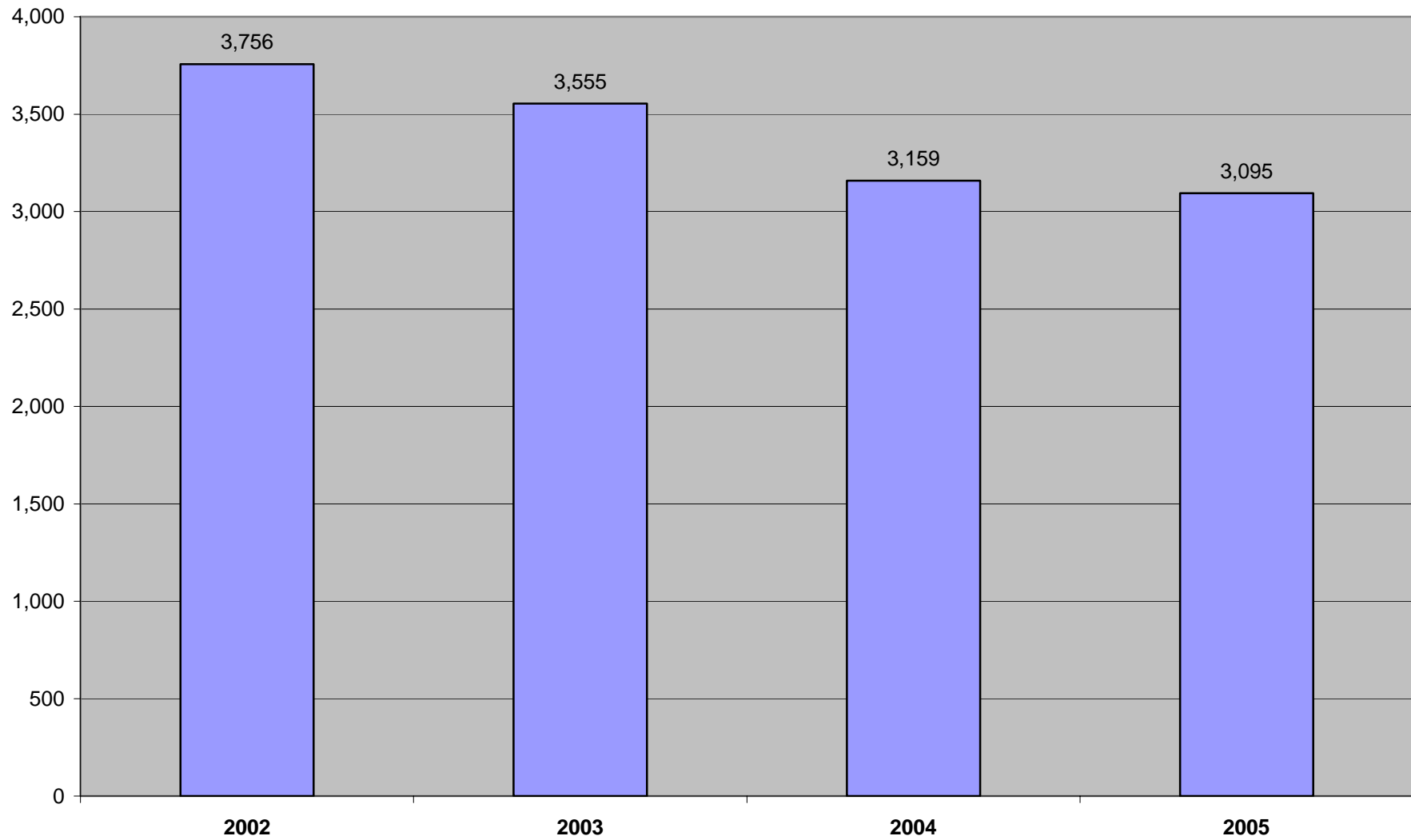
Property & Casualty Restitution for the Years 2002 - 2005



Property & Casualty Complaints for the Years 2002-2005



Property & Casualty Filings Received 2002 - 2005



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