

State Premium Forbearance and Premium Relief Regulatory Requirements

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
AL	Bulletin No. 2020-05	03/30/2020	<ul style="list-style-type: none"> • Recommends insurers consider the following actions for applicable policies in force as of March 13, 2020: <ul style="list-style-type: none"> – Relaxing due dates for premium payments; – Extending grace periods; – Waiving late fees and penalties; – Allowing premium payment plans which will avoid a lapse in coverage; and – Expanding automobile coverage to allow personal vehicles to be covered while delivering food, medicine, or other essential services for commercial purposes. • Suggests that insurers consider cancelation or non-renewal of policies only after exhausting all efforts to work with policyholders to continue coverage. • Notes that “a policy may be cancelled or non-renewed for legally recognized reasons or policy provisions other than late or failure to pay premiums.” • Requests insurers, producers, and other licensees who accept premium payment to consider alternate methods of payment. • Advises affected policyholders to notify their insurance carrier or producer to explain their individual situation and difficulties complying with payment schedules. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted insurers authorized to write P&C, life, health, or disability insurance in Alabama; the Alabama Insurance Underwriting Association; and licensed premium finance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	Yes (DOI regulates pre fi)	“[I]nsurers, producers, and other licensees who accept premium payment [should] consider alternate methods of payment.”
AK	Order R20-04	04/15/2020	<ul style="list-style-type: none"> • Clarifies that the DOI prohibits carriers from terminating insurance contracts due to non-payment. • Requires policyholders or their brokers to notify insurers that they intend to continue coverage. • Notes that insurers will not be obligated to continue coverage if the policyholder obtains coverage elsewhere. • Clarifies that the extension of the grace period does not eliminate the obligation to pay the premium, but limits policy cancellation for late payment. • Requires carriers to work with policyholders in the collection of premiums and to waive all late fees. 	Mandatory	<p>COVERED TIME PERIOD. In effect through November 15, 2020 or when the governor determines the public health disaster emergency no longer exists.</p> <p>COVERED LINES. Not specified but likely all lines.</p> <p>COVERED ENTITIES. “Insurers”/“carriers.”</p>	No	“Where carriers do not collect premium payments directly, carriers nonetheless bear the credit risk if policyholders do not satisfy their payment commitments

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			<ul style="list-style-type: none"> • Reiterates the DOI's expectation that any problems with premium payment during the extended period would be resolved by the insurance company without a consumer complaint being filed. 		<p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		under applicable agency bill or premium finance agreements after the grace period ends.”
	B20-08	03/18/2020	<ul style="list-style-type: none"> • Prohibits insurers from terminating insurance contracts due to non-payment. • Clarifies that the extension of the grace period does not eliminate the obligation to pay the premium, but limits policy cancellation for late payment. • Encourages insurers to work with policyholders in the collection of premiums and to waive all late fees. • Expects that any problems with premium payment during the extended period would be resolved by the insurer without a consumer complaint being filed. 	Mandatory	<p>COVERED TIME PERIOD. In effect through June 1, 2020.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers authorized to transact insurance in the state and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (DOI does not regulate pre fi)	No
AZ	Bulletin 2020-04	04/16/2020	<ul style="list-style-type: none"> • Encourages all insurers to work with their insureds to ensure coverage continues, policies do not lapse, and claimants have adequate time to fulfill requirements to obtain coverage/claim payment. • Urges insurers to consider offering the following types of relief: <ul style="list-style-type: none"> – Refraining from cancelling or non-renewing policies due to non-payment during this time of hardship. – Granting a grace period for premium payments to be made when practicable or extending the time before nonpayment of premium triggers an applicable grace period. – Working with insureds on premium payment plans for late premium payments. – Waiving late fees, interest, and penalties. – Suspending the use of credit reports for rating. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided, though likely though the end of the state of emergency.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers providing insurance coverage.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (ADI does not regulate pre fi)	No

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			<ul style="list-style-type: none"> • Encourages insurers to work with insureds after the public health emergency has ended or as long as reasonably practicable so insureds have time to recover. • Urges consumers to contact their insurance companies to learn what customer relief options are being offered during the public health emergency. • Requires insurers implementing COVID-19-related customer relief programs to make an informational filing in the rate filing system to document their programs. 				
AR	Press Release	04/02/2020	<ul style="list-style-type: none"> • Issues a 60-day moratorium on the cancellation/non-renewal of insurance policies for the non-payment of premiums for residents: <ul style="list-style-type: none"> – Diagnosed with/positively tested for COVID-19; and – Terminated, laid off, or who are self-employed or an independent contractor and have experienced a cessation of work. • Reiterates the requirements noted in the prior Bulletins. 	Mandatory	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All personal lines and life and health insurance policies.</p> <p>COVERED ENTITIES. Not specified, but likely admitted and surplus lines insurance carriers doing business in the state and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No (AID does not regulate pre fi)	No
	Bulletin No. 12-2020	03/27/2020	<ul style="list-style-type: none"> • Issues a 60-day moratorium on the cancellation/non-renewal of personal lines insurance policies. • Directs all insurers and regulated entities that issue personal lines insurance policies in effect on March 11, 2020 remain in effect until the state of emergency expires. • Applies the moratorium to Arkansas residents who, subsequent to the issuance of the state of emergency and as a consequence of the COVID-19 health emergency, have been terminated, laid off, or who are self-employed or an independent contractor and have experienced a cessation of work. • Advises policyholders that this moratorium is not a waiver; it is only an extension or grace period in which to pay premiums. 	Mandatory	<p>COVERED TIME PERIOD. Until the expiration of the state of emergency.</p> <p>COVERED LINES. Personal lines.</p> <p>COVERED ENTITIES. Admitted and surplus lines insurance carriers doing business in the state and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No (AID does not regulate pre fi)	No

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			<ul style="list-style-type: none"> • Directs insurers to work with affected policyholders in paying the 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. • Notes that the premium extension is not automatic, to be eligible, affected policyholders must request the extension from their carriers and carriers may request evidence of employment disruption. • Clarifies that the moratorium only applies to cancellation or non-renewals attributed to a failure to pay premiums during the state of emergency. • Finds that if a policy is to be cancelled or non-renewed for any other allowable reason, the cancellation or non-renewal may be made pursuant to statutory notice requirements and for legally recognized reasons. 				
	Bulletin No. 6-2020 Press Release	03/20/2020	<ul style="list-style-type: none"> • Issues a 60-day moratorium on the cancellation/non-renewal of insurance policies for the non-payment of premiums for residents diagnosed with/positively tested for COVID-19. • Notes that the moratorium extension is not automatic, to be eligible, affected policyholders must request the extension from their carriers. Moreover, this moratorium is not a waiver; it is only an extension or grace period in which to pay premiums. • Notes that this moratorium applies only to cancellation or non-renewals attributed to a failure to pay premiums during the applicable 60-day period. • Clarifies that if a policy is to be cancelled or non-renewed for any other allowable reason, the cancellation or non-renewal may be made pursuant to statutory notice requirements and for legally recognized reasons. However, the Department requests that insurance companies take into consideration that persons diagnosed with COVID-19 may be unable to receive a notice of cancellation or non-renewal. • Directs insurers to work with affected policyholders in paying the premiums that become due during the moratorium period by either 	Mandatory	<p>COVERED TIME PERIOD. 60 days (through May 20, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted and surplus lines insurance carriers doing business in the state and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No (AID does not regulate pre fi)	No

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			allowing a payment plan or a further extension of the due date for the amount in full.				
CA	Bulletin 2020-03	04/13/2020	<ul style="list-style-type: none"> • Orders insurers to make an initial premium refund for the months of March and April to all adversely impacted California policyholders in the following lines of insurance—as quickly as possible—but no later than 120 days after the date of issuance: <ul style="list-style-type: none"> – Private passenger automobile insurance. – Commercial automobile insurance. – Workers’ compensation insurance. – Commercial multiperil insurance. – Commercial liability insurance. – Medical malpractice insurance. – Any other line of coverage where the measures of risk have become substantially overstated as a result of the pandemic. • Grants each insurer reasonable flexibility in determining how best to quickly and fairly accomplish the refund of premium to policyholders (whether via providing premium credit, reduction, return of premium, or other appropriate premium adjustment). • Requires every insurer writing any of the referenced lines of insurance in California to report to the Department within 60 days all actions taken/contemplated future actions to refund premium in response to/consistent with this Bulletin. 	Mandatory	<p>COVERED TIME PERIOD. March and April 2020.</p> <p>COVERED LINES. Private passenger automobile, commercial automobile, workers’ compensation, commercial multiple peril, commercial liability, medical malpractice, any other line where the measures of risk have become substantially overstated as a result of the pandemic.</p> <p>COVERED ENTITIES. Insurers offering covered lines.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). N/A.</p>	No.	No.
	Notice	04/03/2020	<ul style="list-style-type: none"> • Notifies all licensees that they should not attempt to enforce policy or statutory deadlines on policyholders until 90 days after the end of the statewide state of emergency or other “state of emergency” that impacts a specific policyholder, including: <ul style="list-style-type: none"> – Deadlines for the submission of a sworn proof of loss. – Other claim forms. – Examinations under oath – Medical examinations. – Physical inspections of insured property. – Separating damaged property from undamaged property. – Temporary repairs to prevent further damage. 	Voluntary	<p>COVERED TIME PERIOD. 90 days after the end of the statewide state of emergency or other state of emergency that impacts the policyholder.</p> <p>COVERED LINES. Not specified, but likely all lines.</p> <p>COVERED ENTITIES. Admitted and non-admitted insurance companies, all licensed insurance adjusters and producers, and other licensees and interested parties.</p>	No (CDI does not regulate pre fi)	No

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			<ul style="list-style-type: none"> - Any other policy, statutory, or insurer-imposed deadlines placed on the policyholder where failure to comply could result in the forfeiture, limitation, or waiver of any policyholder(s) rights to benefits under any policy of insurance. 		<p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
	Notice Press Release	03/18/2020	<ul style="list-style-type: none"> • Requests that all insurers provide their policyholders with at least a 60-day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during this challenging time due to circumstances beyond the control of the insured. • Requests all agents, brokers, and other licensees who accept premium payments on behalf of insureds to take steps to ensure that customers have the ability to make prompt insurance payments. 	Voluntary	<p>COVERED TIME PERIOD. 60 days (through May 18, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted and non-admitted insurance companies (plus all licensed producers and other interested parties).</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (CDI does not regulate pre fi)	The Notice requests “producers who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make prompt insurance payments.”
CO	Bulletin B-4.107	04/21/2020	<ul style="list-style-type: none"> • Directs carriers to defer the triggering of a grace period for a policyholder’s failure to pay premium and make reasonable accommodations to prevent policyholders from losing coverage due to non-payment or partial payment of premiums during this unprecedented time. • Clarifies that additional reasonable accommodations should include, but not be limited to: <ul style="list-style-type: none"> - Extension of premium deferrals and premium due dates; - Acceptance of partial payments; - The use of payment plans; and - Waiver of late payment fees, installment fees, interest, or other associated penalties. • If a carrier has issued a notification of health coverage cancellation for non-payment of premium for the month of April, directs the carrier to withdraw the notification and inform the policyholder that 	Mandatory	<p>COVERED TIME PERIOD. Until 30 days after the state’s emergency ends or the bulletin is rescinded, whichever is earlier.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All insurers offering individual health benefit plans.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Does not alter the obligation to make an initial premium payment so as to first effectuate coverage.</p>	No	“Any person or entity that accepts premium payments on behalf of a carrier is directed to allow practicable alternative methods of payment, such as online payments or other arrangements that eliminate the need for in-

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			<p>the cancellation is suspended, unless the policyholder specifically directs the carrier to cancel coverage.</p> <ul style="list-style-type: none"> • Notes that the moratorium does not apply to cancellations in cases of fraud or intentional misrepresentation of a material fact. • Advises carriers to work with policyholders impacted by COVID-19 and make allowances for the payment of premiums that become due during that time. • Suggests that carriers work with policyholders to set up affordable payment plans to collect past due premiums without loss of coverage, and should not require the full payment as a balloon payment for past due premiums at the end of the COVID-19 disaster emergency. • Requires carriers to provide policyholders who have failed to pay premium, in full or in part, during the COVID-19 disaster emergency with information of the accommodations available to them. 				person payments, to protect the safety of individuals and the public.”
	Bulletin B-5.39	04/06/2020	<ul style="list-style-type: none"> • Where an insurer chooses to implement any discounts or premium relief actions during the COVID-19 pandemic, requires them to submit a filing to the Property & Casualty Rates & Forms Section. • Requires the filing to address the following: <ul style="list-style-type: none"> – Support/justification for any such discounts or premium relief actions (e.g., explanation of the actuarial judgment, explanation of those to receive the premium relief, the amount of each discount/premium relief, etc.); and – Explanation of how the insurer will ensure that the discounts/premium relief action will not result in dissimilar treatment or unfair subsidization. 	Mandatory reporting requirement	<p>COVERED TIME PERIOD. Not stated, but likely as long as the state’s emergency and public health orders are in effect or until the Bulletin is rescinded, whichever is later.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. All insurers issuing P&C policy forms and offering discounts or premium relief during the COVID-19 pandemic.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). N/A</p>	No	No

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	Bulletin B-4.105 Press Release FAQs	03/27/2020	<ul style="list-style-type: none"> • Directs carriers to make reasonable accommodations to prevent businesses and employees from losing coverage due to non-payment of premiums during the COVID-19 outbreak. Reasonable accommodations should include but not be limited to: <ul style="list-style-type: none"> – Extension of premium grace periods or premium deferrals; – Waiver of late payment fees or interest; and – A moratorium on cancellations for non-payment. • Directs carriers to report the certain information to the Department on a monthly basis. 	Mandatory	<p>COVERED TIME PERIOD. As long as the state’s emergency and public health orders are in effect or until the Bulletin is rescinded, whichever is later.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. Admitted carriers offering small and large group health benefit plans, managed care plans, and grandfathered health benefit plans.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Does not apply with respect to the first payment, when you initially purchase the policy.</p>	No	No
	Bulletin B-5.38 FAQs	03/27/2020	<ul style="list-style-type: none"> • Directs all insurers issuing coverage to personal and commercial policyholders to make reasonable accommodations to prevent individuals and businesses from losing coverage due to cancellation for the non-payment of premium, including <ul style="list-style-type: none"> – Extending premium grace periods; – Waiving of late payment fees; – Creating a moratorium on cancellations for non-payment; – Deferring any non-renewal underwriting actions; and, – Providing a continuation of coverage for any expiring policy. 	Mandatory	<p>COVERED TIME PERIOD. As long as the state’s emergency and public health orders are in effect or until the Bulletin is rescinded, whichever is later.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. All insurers that issue and have in effect property and casualty policies in the state and insurance producers who collect and remit premiums.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
CT	Executive Order No. 7s Press Release	04/01/2020	<ul style="list-style-type: none"> • Establishes a 60-day grace period for premium payments, policy cancellations, and non-renewals of insurance policies through June 1, 2020. 	Mandatory	<p>COVERED TIME PERIOD. Through June 1, 2020.</p> <p>COVERED LINES. All lines.</p>	No (while CID regulates pre	No

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			<ul style="list-style-type: none"> • Requires insurers to provide a 60-day grace period to individuals that have policies who, as a result of COVID-19, were laid off, furloughed, or fired from employment or otherwise suffered a significant loss in revenue. • Requires insurers to provide a 60-day grace period to businesses that are group policyholders, gave group insurance, and or P&C insurance that were required to close or significantly reduce operations or suffered significant revenue loss as a result of COVID-19. • Clarifies that the 60-day grace period is not automatic; to be eligible, affected policyholders must provide information to document the impact of COVID-19. • Advises policyholders that this grace period is not a waiver or forgiveness of the premium; it is only an extension of time in which to pay premiums. • Notes that the grace period applies only to cancellation or non-renewals attributed to failure to pay premiums during the applicable 60-day period (i.e., if a policy is to be cancelled or non-renewed for any other allowable reason, the cancellation or non-renewal may be made pursuant to the statutory notice requirements and for legally recognized reasons). 		<p>COVERED ENTITIES. All entities licensed or regulated by the Insurance Department, including admitted and non-admitted insurance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Applies to premiums due after the initial premium has been made to secure coverage.</p>	fi, the operative provisions apply to insurers)	
	Bulletin IC-40	03/24/2020	<ul style="list-style-type: none"> • Requests that all insurers provide their insureds with at least a 60-day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during COVID-19. • Clarifies that this is not intended to change the terms of the issued policy or be considered a forgiveness of the premium; rather, it is intended that the insurer grant the policyholder an extended grace period for the payment of premium due without penalty or interest. • 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. 	Voluntary	<p>COVERED TIME PERIOD. At least 60 days (through at least May 24, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All admitted and non-admitted insurance companies, all licensed producers, and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Applies to premiums due after the initial premium has been made to secure coverage.</p>	No	No, but the Bulletin requests all agents and brokers who accept premium payments on behalf of insurers to take steps to ensure that customers have the ability to make prompt insurance payments.

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DE	Bulletin No. 117 Bulletin No. 33	04/03/2020	<ul style="list-style-type: none"> • Reminds insurers that the Sixth Modification prohibits, without a court order, the suspension, cancellations and nonrenewals of certain defined insurance policies due to nonpayment of premium during the pendency of the state of emergency. • Encourages insurers to reach out to their insureds and work with them to modify payment schedules or otherwise make premium payment modifications during the duration of the state of emergency. • Advises that insurers obtain validation that the hardship of the insured or policyholder is directly related to the COVID-19 pandemic. 	Clarification of Executive Action		No	No
	Ninth Mod. of a State of Emerg.	04/01/2020	<ul style="list-style-type: none"> • Clarifies that the Sixth Modification intends to grant covered policyholders an extension of time for the payment of premium due under covered insurance policies during the pendency of the declared state of emergency without penalty or interest. • Notes that this is not intended to vary the terms and conditions of any covered insurance policy or be considered a forgiveness of premium due by a covered policyholder under a covered insurance policy prior to, post, or during the pendency of the declared state of emergency. • Upon the termination of the COVID-19 state of emergency, requires any premium due by a covered policyholder to remain due under a covered insurance policy. 	Clarification of Executive Action		No	No
	Eighth Mod. of the State of Emerg.	03/30/2020	<ul style="list-style-type: none"> • Clarifies that the Sixth Modification does not relieve any policyholder of the obligation to pay premium payments due an insured or to comply with other obligations that a policyholder may have pursuant to a covered insurance policy. 	Clarification of Executive Action		No	No
	Bulletin No. 116	03/26/2020	<ul style="list-style-type: none"> • Prohibits, without a court order, the suspension, cancellations, and non-renewals due to nonpayment of premium during the pendency of the state of emergency. 	Mandatory	COVERED TIME PERIOD. During the state of emergency.	No	No

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			<ul style="list-style-type: none"> • Encourages policyholders to contact their carriers to discuss their options if they are suffering a hardship as a result of a COVID-19-related restriction. • Advises all producer licensees to take all necessary actions to ensure their ability to promptly service claims and provide other essential services to insureds affected by the COVID-19 crisis. 		<p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurance carriers authorized to transact business in the state and all licensed insurance producers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
	Sixth Mod. of the State of Emerg. Press Release	03/24/2020	<ul style="list-style-type: none"> • Requires that insurers cease cancellations or nonrenewals of insurance policies due to nonpayment throughout the duration of the state of emergency for those residents and businessowners who are experiencing a loss of income due to COVID-19 (i.e., was laid off or fired from their employment or was required to close or significantly reduce its business). • Prohibits an insurer—without a court order—form lapsing, terminating, or causing to be forfeited a covered insurance policy because a covered policyholder does not pay a premium, interest, or indebtedness on a premium under the policy that is due during the pendency of the state of emergency. • Applies to policyholders that, as a result of the conditions imposed under the COVID-19 state of emergency or the public health emergency, was laid off or fired from their employment or was required to close or significantly reduce its business. 	Mandatory	<p>COVERED TIME PERIOD. During the state of emergency (at least until May 15, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. “Insurers.” No further clarification offered, but likely that intent is to cover both admitted and non-admitted carriers doing business in Delaware.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
	Bulletin No. 116 Press Release	03/20/2020	<ul style="list-style-type: none"> • Requests that all admitted and non-admitted carriers suspend cancellations and nonrenewals due to nonpayment of premium during the pendency of the Governor’s declared State of Emergency. • Encourages policy holders to contact their carriers to discuss their options if they are suffering a hardship as a result of the COVID-19 related restrictions. • Advises all producer licensees to take all necessary actions to ensure their ability to promptly service claims and provide other essential services to insureds affected by COVID-19. 	Voluntary	<p>COVERED TIME PERIOD. During the state of emergency (at least until May 15, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All admitted and non-admitted carriers doing business in Delaware</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

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DC	Comm'r Order 03-2020	04/27/2020	<ul style="list-style-type: none"> • Prohibits insurance companies and premium finance companies from terminating insurance contracts due to non-payment. • Clarifies that this prohibition does not eliminate the obligation to pay unpaid premiums but will be considered an extension of the grace period. • Requires insurance companies to provide policyholders the ability to repay any unpaid premiums in installments over a period of not less than 12 months beginning one month after the end of the state of emergency. • Requires insurance companies to waive late fees for premium payments due but not paid. • Directs insurance companies to make reasonable accommodations for policyholders during the state of emergency, including: <ul style="list-style-type: none"> – Waive installment, late payment, or reinstatement fees. – Defer cancellations, non-renewals, and adverse underwriting actions. – Extend billing due dates and premium grace periods. – Ensure that late payments during the emergency are not considered in any future premium calculations at any time. – Make District policyholders aware of the accommodations available. – Provide ready access for policyholders to apply for such accommodations online, by mail, and telephonically. – Provide an option to use electronic payment technology through a website, a software application or electronic bank transfers, when possible. • Provides that prospective reductions in premium or retroactive refunds of premium offered by an insurance company due to changes in risk exposure will not be considered a rate change that requires a new rate filing or action constituting a rebate/unfair discrimination. • Notes that the Department will provide expedited review of form and rate filings to insurance companies that offer reasonable accommodations and premium relief to policyholders. 	Mandatory	<p>COVERED TIME PERIOD. During the state of emergency (at least until May 15, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurance companies authorized to conduct business in the District and insurance premium finance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	Yes (pre-fi regulated by DISB)	No

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FL	OIR-20-04M	03/25/2020	<ul style="list-style-type: none"> • Encourages regulated entities, when prudently possible, to be flexible with premium payments by considering the following: <ul style="list-style-type: none"> – Relaxing due dates; – Extending grace or reinstatement periods; – Waiving late fees and penalties; and – Allowing payment plans. • Suggests that regulated entities only consider cancellation of policies if all possible efforts to work with consumers to continue coverage have been exhausted. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers and entities regulated by the Florida Office of Insurance Regulation.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes	No
GA	Directive 20-EX-5 Press Release Bulletin 20-EX-7	03/29/2020	<ul style="list-style-type: none"> • Directs property and casualty insurers to refrain from canceling, for the cause of non-payment, any commercial policies that include business interruption or business income coverage. • Directs health insurers to refrain from canceling health policies for non-payment. • Encourages health insurers to be accommodating towards consumer who find themselves in financial difficulty. 	Mandatory	<p>COVERED TIME PERIOD.</p> <ul style="list-style-type: none"> • P&C – Through May 19, 2020. • Health – Through May 31, 2020. <p>COVERED LINES. P&C and health.</p> <p>COVERED ENTITIES. All licensed insurance companies in the state of Georgia.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
HI	Comm'rs Memo 2020-4	04/27/2020	<ul style="list-style-type: none"> • Clarifies that premium forbearance activities will not qualify as unfair methods of competition/unfair trade practices under Hawaii law. • Encourages carriers to consider adopting and implementing the following activities during the emergency period: <ul style="list-style-type: none"> – Waive fees, penalties, or other charges relating to an insured's temporary inability to submit premium payments. – Extend grace periods for payment of premiums. 	Voluntary	<p>COVERED TIME PERIOD. 60 days (May 26, 2020)</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All admitted and non-admitted insurers offering policies in the state of Hawaii.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> - Grant additional time to policyholders to pay premiums before non-renewals or cancellations become effective. - Extend proof of loss submission deadlines to claimants. • Notes that the Department will consider proposals from insurers seeking to adjust policies based on changes in an insurer's risk exposure in the following ways: <ul style="list-style-type: none"> - Temporarily reduce premiums prospectively. - Refund premiums retroactively. • Allows insurers to deviate from filed rates or contractual language, so long as the following are true: <ul style="list-style-type: none"> - Newly proposed rates are lower than what is the latest approved rate on file. - Insurer's actions are applied uniformly and without prejudice to all similarly affected insureds. - Insurers have notified the Commissioner in writing of their specific proposal and justifications. 		<i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.		
	Comm's Memo 2020-3	03/27/2020	<ul style="list-style-type: none"> • Encourages insurers to work with their insureds to ensure coverage continues during this time, policies do not lapse, and to consider the following: <ul style="list-style-type: none"> - Refrain from canceling or non-renewing policies due to non-payment during this time of hardship and to grant a grace period for premium payments to be made; - Work with insureds on a structured payment plan for late premium payments; - Waive late fees and penalties; - Extend timeframes to complete property and automobile inspections or undergo medical examinations; and - Continue working with insureds for a period of 60 days after this health emergency has passed, or as long as reasonably practical. 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> All lines.</p> <p><i>COVERED ENTITIES.</i> All admitted and non-admitted insurers offering policies in the state of Hawaii.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	No	No
ID	Bulletin No. 20-05	04/15/2020	<ul style="list-style-type: none"> • Encourages carriers to consider implementing the following activities: 	Voluntary	<i>COVERED TIME PERIOD.</i> So long as the Governor's emergency proclamation remains in effect.	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> - Waiver of fees, penalties, or other charges relating to an insured's temporary inability to submit premium payments or otherwise respond to an insurer's inquiries; - Extensions of grace periods for payment of premiums; - Additional time before non-renewals or cancellation become effective; and - Extensions of proof of loss deadlines. <ul style="list-style-type: none"> • Notifies carriers that the Department will consider specific proposals from insurers designed to qualify adjust to changes in the insurer's risk exposure (e.g., temporarily reduce premium prospectively, refund premium retroactively, or both). 		<p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. All P&C insurance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>		
	Bulletin No. 20-01	04/06/2020	<ul style="list-style-type: none"> • Encourages health carriers to submit specific proposals designed to retain coverage for individuals and/or employees by waiving certain statutory requirements or, should they choose not to submit, then health carriers are expected to not enforce the following contractual provisions in filed forms—among others—extensions of grace periods for payment of premiums for individual policies. 	Voluntary	<p>COVERED TIME PERIOD. So long as the Governor's emergency proclamation remains in effect.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All health insurance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
IL	Company Bulletin 2020-11	04/20/2020	<ul style="list-style-type: none"> • Requires health insurance insurers to extend premium payment deadlines by 60 days and prohibits cancellations based on nonpayment of premium for 60 days (for binder payments to secure new coverage, provides that deadlines will be extended by 30 days). 	Mandatory	<p>COVERED TIME PERIOD. Only while the Governor has a disaster proclamation in effect for all counties of the state.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All health insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
	Company Bulletin 2020-09	04/03/2020	<ul style="list-style-type: none"> • Requests insurers consider implementing the following protective measures: <ul style="list-style-type: none"> – Seek to postpone or withdraw any previous notice of cancellation or nonrenewal in which the cancellation or nonrenewal occurs on/after March 9, 2020 on any in-force policy. – Consider postponing the issuance of any new cancellation or nonrenewal notices through April 30, 2020 or a later time if considered reasonable given an individual’s circumstances. – Consider granting an extension of any policy provisions or other requirements that that impose a time limit for an insured or claimant to perform any act. 	Voluntary	<p>COVERED TIME PERIOD. At least through April 30, 2020.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. All companies and other entities licensed to transact insurance business in the state who issue or deliver P&C insurance policies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No (pre fi not licensed to transact insurance business)	No
IN	Bulletin 252	03/26/2020	<ul style="list-style-type: none"> • Requests that all insurers/HMOs institute a moratorium on policy cancelations and non-renewals for 60 days. • Clarifies that the moratorium is not a waiver; it is only an extension of the period in which to pay the premium and a suspension of any penalty attached to a late payment (i.e., after the 60 days, the policyholder will have to resume making premium payments). • Requests that insurance companies work with the impacted policyholders in paying the premiums that would have become due during the moratorium period by either allowing a payment plan or a further extension in paying the amount due in full. • Notes that the moratorium applies only to cancelations and non-renewals attributed to a failure to pay premiums directly during the 60-day period (i.e., if a policy is to be cancelled or non-renewed for any other allowable reason, the cancelation or non-renewal may be made pursuant to the statutory notice requirements). 	Voluntary	<p>COVERED TIME PERIOD. Through May 18, 2020.</p> <p>COVERED LINES. Not specified, but possibly all lines.</p> <p>COVERED ENTITIES. All insurance companies and HMOs in Indiana.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
IA	Bulletin 20-04	03/19/2020	<ul style="list-style-type: none"> • Requests that all health insurers and HMOs: <ul style="list-style-type: none"> – Allow a premium payment grace period for any Iowa individual health benefit plan and to any health benefit plan issued to small employers. – Put in place procedures allowing individual and small employer policyholders affected by the economic disruptions resulting from COVID-19 to request extensions for premium payments beyond the insurers' normal payment due dates. • Does not request that health insurers or HMOs waive any premiums or other consideration owed on any policy or contract. • Does not request any health insurer or HMO refrain from terminating coverage on the basis of fraud on the part of the insured. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided</p> <p>COVERED LINES. Health</p> <p>COVERED ENTITIES. All health insurers and HMOs licensed in the state.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
KS	FAQs	04/27/2020	<ul style="list-style-type: none"> • Notes that the Commissioner of Insurance does not have the authority to mandate a moratorium on policy cancellations due to nonpayment of premium. • Encourages consumers to work directly with their insurers to explore options on payment plans, extended grace periods, etc. 	Clarification on policy		No	No
KY							
LA	Emerg. Rule 40 (amended)	04/03/2020	<ul style="list-style-type: none"> • Suspends any notice of cancelation, notice of nonrenewal, nonreinstatement, or any other notice, except to the extent such provisions apply to acts or practices constituting fraud or intentional misrepresentations of material fact (i.e., does not prevent an insurer from canceling or terminating an insurance policy for fraud or material misrepresentation on the part of the insured). • Suspends any and all provisions relative to providing for a premium finance company to act on behalf of and/or as agent for an insurance company or an insured. 	Mandatory	<p>COVERED TIME PERIOD. May 12, 2020 or the date the Governor lifts the State of Emergency, whichever occurs first.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Any authorized insurer operating in Louisiana, any approved unauthorized insurer, eligible unauthorized insurer, premium finance companies, or domestic surplus lines insurer operating in Louisiana.</p>	No (LDI does not regulate pre fi, despite pre fi provisions in the emergency rule)	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> • Prohibits a policy from being canceled or nonrenewed solely because of a claim that is filed during or occurs during the COVID-19 emergency. • Imposes a moratorium on policy cancellations and non-renewals for policyholders in Louisiana during the COVID-19 outbreak, unless upon the documented written request or written concurrence of the insured. • Notes nothing in the rule exempts or excuses an insured from the obligation to pay the premiums otherwise due for actual insurance coverage provided. 		<i>COVERED POLICIES</i> (i.e., New and/or Renewal). Does not apply to any new insurance policy issued on or after March 12, 2020.		
ME	Ins. Emerg. Response Order	04/06/2020	<ul style="list-style-type: none"> • Requires carriers issuing individual coverage on the Health Insurance Marketplace to postpone the commencement of the premium grace period until at least June 1, 2020 for all policyholders receiving APTC who fail to pay premium when due. • Until at least June 1, 2020, requires carriers to provide relief from premium cancellation to any individual policyholder not receiving APTC and any to any small or large group policyholder, if the policyholder applies to the carrier for such relief and certifies that their inability to make a timely premium payment was the result of hardship arising out of the COVID-19 pandemic, such as illness, layoff, furlough, business closure, or substantial loss of income or business revenue. • Requires the carrier to refrain from completing or initiating cancellation or nonrenewal of any eligible policy for nonpayment of premium and to reinstate—retroactively to the date of termination—any eligible policy that has been terminated for nonpayment of premium between March 12, 2020 and April 6, 2020. • Permits carriers to continue to issue premium bills and requires them to notify any insured whose coverage would otherwise be subject to termination that the extension of time to pay premium does not exempt or excuse the insured from the obligation to pay the premiums owed for the insurance coverage that is provided, but only postpones the date that payment is due. 	Mandatory	<p><i>COVERED TIME PERIOD.</i> Through June 1, 2020.</p> <p><i>COVERED LINES.</i> Health.</p> <p><i>COVERED ENTITIES.</i> Carriers issuing health plans in Maine’s individual, small group, and large group insurance markets.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> Requires carriers to provide certain advice to individuals with overdue premiums. 				
	Bulletin 442	03/12/2020	<ul style="list-style-type: none"> Requires carriers to make all reasonable accommodations for late payments and other problems that are beyond the consumer's control. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Not specified, but likely all lines.</p> <p>COVERED ENTITIES. "Carriers." No further clarification is offered.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
MD	Bulletin 20-12 MIA Advisory	04/09/2020	<ul style="list-style-type: none"> Encourages all P&C insurers to consider making rate filings that provide temporary relief to insureds during the emergency (e.g., premium discounts for specific perils or coverages, or any other appropriate reduction in premium commensurate with reduced loss exposure). Clarifies that P&C insurers that have implemented rate relief measures must make a filing with the Administration. 	Voluntary, with a mandatory reporting requirement	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. P&C insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
	Bulletin 20-10 Press Release	03/20/2020	<ul style="list-style-type: none"> Encourages all insurers to make reasonable accommodations so that individuals and businesses do not lose coverage due to non-payment of premiums during the COVID-19 state of emergency. Provides 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. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Life and health, P&C.</p> <p>COVERED ENTITIES. Life and health, P&C carriers doing business in Maryland.</p>	No (though the Bulletin is addressed to pre fi, the controlling language is not directed at them)	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
					<i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.		
MA	Bulletin 2020-05 Press Release	03/23/2020	<ul style="list-style-type: none"> • Requests that insurers do the following: <ul style="list-style-type: none"> – Explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance or issuance of coverage. – Explain grace periods that usually allow stressed policy holders experiences significant financial hardship to delay payments without coverage being terminated. – Work with employers or individuals experiencing financial hardships to find the best ways to address concerns with the timing of premium payments in order to delay any cancellation of coverage for non-payment and collection activity. – Explore all ways to relax due dates for from premium payments; extend grace periods; waive late fees, non-sufficient fund fees, installment fees and penalties; allow payment plans for premium payments; assist affected policyholders to find ways that insurance policies do not lapse; and consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage. • Asks health insurance carriers to consider the following steps: <ul style="list-style-type: none"> – Be prepared to explain grace periods that may be available and whether the carrier may be willing to allow employers to continue to pay for employees’ health coverage during periods when the employees are on furlough or laid off. – Work with employers to allow flexibility in submitting enrollment, renewal, or other information necessary to begin or renew health coverage. 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> All lines.</p> <p><i>COVERED ENTITIES.</i> All insurance carriers issuing insured coverage in Massachusetts and self-insurance groups covering employers in Massachusetts.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
MI	Bulletin 2020-16-INS	04/13/2020	<ul style="list-style-type: none"> • Advises all insurers to consider flexibility to help insureds avoid additional financial consequences as a result of their inability to pay insurance premiums or timely file claims. 	Voluntary	<i>COVERED TIME PERIOD.</i> 90 days after the expiration of the state of emergency declared on March 10, 2020 (and any extension thereof).	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> • Strongly encourages insurers to provide their insureds with at least a 60-day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium. • Provides that insurers may effectuate this directive 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. • Encourages insurers to allow for payment plans for the backdue premium at the end of an insured's 60-day grace period, in lieu of a balloon-type premium bill. • Urges insurers to work with their insureds experiencing financial hardship during the COVID-19 pandemic to discuss specific policy options available to them that may modify the amount of premium owed. • Asks that insurers make adjustments to claim filing deadlines to accommodate insureds who may encounter difficulty in timely providing notice of a claim. 		<p><i>COVERED LINES.</i> All lines.</p> <p><i>COVERED ENTITIES.</i> Insurers.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
MN	Press Release	04/30/2020	<ul style="list-style-type: none"> • Encourages insurers to make the following accommodations: <ul style="list-style-type: none"> – Waive or discount premiums for coverages that can be used to a limited extent, if at all, while work from home is necessary or required. – Review all eligibility criteria for discounts. – Prevent insured individuals from losing their discounts due to events which are outside the control of policyholders. – Provide flexibility for insureds who may be temporarily modifying their business operations or personal lives to accommodate social distancing. – Ensure that additional flexibilities offered at this time (e.g., consumers that need extra time to pay premiums should not receive rate increases because of the need for additional time to make premium payments). 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> P&C.</p> <p><i>COVERED ENTITIES.</i> “Insurers.”</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
MS	Bulletin 2020-04	04/01/2020	<ul style="list-style-type: none"> Clarifies that insurers may issue cancellation/non-renewal notices for non-payment of premiums during the 60- day moratorium period. 	Clarification of previous Bulletin	<p>COVERED TIME PERIOD. 60 days (May 24, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted and surplus lines insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No
	Memo	03/27/2020	<ul style="list-style-type: none"> Directs all premium finance company licensees acting under a premium finance agreement that contains a power of attorney clause for a policy issued/issued for delivery in Mississippi to comply with the provisions of the Department of Insurance Bulletin. 	Mandatory	<p>COVERED TIME PERIOD. 60 days (May 24, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Premium finance company licensees.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	Yes	No
	Bulletin 2020-03 FAQs	03/24/2020	<ul style="list-style-type: none"> Issues a 60-day moratorium on the cancelation/non-renewal of policies for the non-payment of premiums. Advises that this moratorium is not a waiver of premium; rather, it is a moratorium on the cancelation or non-renewal of policies for the failure to pay premiums during the applicable 60-day period. Directs insurers to work with impacted policyholders in paying the 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. Notes that if a policy is to be canceled or non-renewed for legally recognized reasons other than a failure to pay premiums, the cancelation or non-renewal may be made pursuant to the statutory notice requirements. 	Mandatory	<p>COVERED TIME PERIOD. 60 days (May 24, 2020).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted and surplus lines insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
MO	Bulletin 20-08	04/10/2020	<ul style="list-style-type: none"> Strongly encourages insurers choosing to provide premium relief strategies to insureds as a result of COVID-19 to submit filings in order to document such strategies. 	Voluntary reporting requirement	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. P&C insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). N/A</p>	No	No
	Bulletin 20-05 Press Release FAQs Bulletin 20-10	03/21/2020	<ul style="list-style-type: none"> Strongly encourages: <ul style="list-style-type: none"> Insurers to not cancel, non-renew, or terminate coverage while the Bulletin is in effect. To extend a grace period of at least 60 days for coverage where premium or subscription charges are unpaid. Does not require insurers to waive any premiums or other consideration owed on any policy or contract during this time of year. Anticipates that a failure to pay premiums or remit consideration may subject the policy to retroactive cancelation, in accordance with the policy terms. Notes that nothing in the Bulletin should be construed as a request to refrain from terminating coverage on the basis of fraud on the part of an insured. Strongly encourages health carriers to extend a grace period of at least 60 days for coverage in effect as of March 13, 2020, where premium or subscription charges are unpaid. Does not preclude insurers from setting up payment plans or other accommodations to assist consumers, to the extent possible or as required by law. 	Voluntary	<p>COVERED TIME PERIOD. Through June 15, 2020.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers conducting the business of insurance in the state of Missouri and any and all other entities doing business in Missouri or regulated by the Department.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No (the MDI does not regulate pre fi)	No
MT	Info. Bulletin Update to Info. Bulletin	04/13/2020	<ul style="list-style-type: none"> Clarifies that P&C insurers who have issued or may be considering COVID-19-related premium refunds, discounts, or credits, are not required to submit a form filing. 	Mandatory reporting requirement	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. P&C.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> • Requires insurance companies who desire to issue refunds, discounts, or credits to comply with rate filing requirements. 		<p>COVERED ENTITIES. All insurers issuing P&C policy forms and offering discounts or premium relief during the COVID-19 pandemic.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). N/A</p>		
	Comm'r's Letter Press Release Press Release	03/26/2020	<ul style="list-style-type: none"> • Requests that insurers work in the following ways to help insureds: <ul style="list-style-type: none"> – Providing flexible payment solutions for families, individuals, and businesses; providing additional time to make payments; allowing grace periods to delay premium payments. – Suspending premium billing for small businesses such as restaurants, bars, and others that have been shut down or had their operations severely reduced, for a specific number of days or billing cycles. – Waiving insurance premium late fees and other fees for families, individuals, and businesses. – Pausing cancellation of coverage to motorists due to temporary non-payment and policy expiration. – Expediting/expanding automobile coverage to allow personal vehicles to be covered while delivering food, medicine, or other essential provisions for commercial purposes. – Streamline administrative processes and paperwork to ease consumer burdens and facilitate continuous coverage. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines</p> <p>COVERED ENTITIES. All insurance companies across all lines of business, all licensed producers, independent adjusters, and other interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (while CSI regulates pre fi, the operative provisions target insurers)	No
NE							
NV	COVID-19 DOI Statement	03/30/2020	<ul style="list-style-type: none"> • Encourages all health insurance carriers to consider the following relief for Nevadans affected by COVID-19: <ul style="list-style-type: none"> – Providing an additional 60-day period before cancelation of coverage; – Providing flexibility with due dates for premiums; – Waiving late fees and penalties; – Payment plans for premiums to avoid a lapse in coverage; 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. Health insurers.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> Only cancel or non-renew if all other efforts are exhausted/do not impose discriminatory cancellations or non-renewal options; and Encourage use of electronic payments. 		<i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.		
	COVID-19 DOI Statement	03/30/2020	<ul style="list-style-type: none"> Encourages all P&C carriers to consider the following relief for Nevadans affected by COVID-19: <ul style="list-style-type: none"> Providing an extended grace period before cancelation of coverage; Providing flexibility with due dates for premiums; Waiving late fees and penalties; Payment plans for premiums to avoid a lapse in coverage; Only cancel or non-renew if all other efforts are exhausted. 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> P&C.</p> <p><i>COVERED ENTITIES.</i> P&C carriers.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	No	No
NH							
NJ	Press Release Bulletin – Individual Market Bulletin – Small Employer Market Bulletin – Large Employer Market Bulletin – Medicare Supp.	04/10/2020	<ul style="list-style-type: none"> Directs carriers in the individual, small group, and large group health insurance markets to: <ul style="list-style-type: none"> Provide a 60-day grace period to pay premiums and continue paying claims during this period. Allow policyholders to amortize any unpaid payments over the remaining policy period (for example, if six months are remaining, the policy holder must be given the option to pay the unpaid premium in six installments in addition to the regular monthly premium). Provide those with individual health plans obtained through the federal marketplace up to a 60-day grace period with claims paid and additional flexibility. Waive late payment and fees otherwise due, and not report late payments to credit reporting agencies. Refrain from cancelling any policy or contract for nonpayment during the emergency grace periods and not seek recoupment from any policyholder for any claims incurred during this emergency grace period. 	Mandatory	<p><i>COVERED TIME PERIOD.</i> 60 days</p> <p><i>COVERED LINES.</i> Health.</p> <p><i>COVERED ENTITIES.</i> Individual, small group, and large group insurers; HMOs; and other entities issuing health or dental benefit plans.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> - Waive certain rules that as a result of the COVID-19 emergency could serve as a barrier to coverage for employees and employers. 				
	Bulletin = P&C Press Release	04/10/2020	<ul style="list-style-type: none"> • Directs P&C carriers to provide their insureds who may be experiencing a financial hardship due to COVID-19 with at least a 90-day grace period to pay premiums and continue paying claims during this period. • Permits a policyholder to elect this 90-day emergency grace period to begin retroactively on April 1, 2020 or opt for the grace period to begin on May 1, 2020. • Directs insurers to: <ul style="list-style-type: none"> - Allow policy holders to pay premiums not paid during the 90-day period over the remainder of the current policy term or in up to 12 months, whichever is longer. - Waive late payment fees otherwise due, and not report late payments to credit rating agencies. - 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.). - Permit the grace period to be applied to all installment payments, including renewal down payments, provided that the insured provides notice to the insurer that they wish to continue coverage. • Clarifies that this grace period is not intended to change the terms of the issued policy or contract or be considered a forgiveness of the premium (i.e., it is intended that the insurer grant the policyholder or certificate holder an extended grace period for the payment of premium without penalty or interest). • Directs insurers to post the information on their website and provide each policyholder with an easily readable written description of the terms of the extended grace period to be submitted as an informational rate filing. 	Mandatory	<p>COVERED TIME PERIOD. 90 days.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. P&C insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	“All agents, brokers, and other licensees who accept payments on behalf of insurers must take steps to ensure that customers able to make payments have the ability to make prompt insurance payments through alternate methods of payment, such as online payment.”

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	Bulletin – Life Press Release	04/10/2020	<ul style="list-style-type: none"> • Directs life insurance carriers to provide at least a 90-day grace period to policyholders or certificate holders to pay life insurance and annuity contracts premiums. • Permits a policyholder to elect this 90-day emergency grace period to begin retroactively on April 1, 2020 or opt for the grace period to begin on May 1, 2020. • Provides that, during this extended grace period, life insurance companies cannot cancel any insurance policy for nonpayment of premium. • Directs life insurers to: <ul style="list-style-type: none"> – Waive late payment fees otherwise due, including any interest permitted and refrain from reporting late payments to credit rating agencies, during the 90-day period. – Allow premiums not paid during the 90-day period to be paid over the course of the following year in up to 12 equal installments. – Extend to 90 days the period to exercise policyholder and contract holder rights and benefits under life insurance and annuity contracts. • Clarifies that this grace period is not intended to change the terms of the issued policy or contract or be considered a forgiveness of the premium (i.e., it is intended that the insurer grant the policyholder or certificate holder an extended grace period for the payment of premium without penalty or interest). • Directs insurers to post the information on their website and provide each policyholder with an easily readable written description of the terms of the extended grace period to be submitted as an informational rate filing. 	Mandatory	<p>COVERED TIME PERIOD. 90 days.</p> <p>COVERED LINES. Life.</p> <p>COVERED ENTITIES. Life insurers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). “This grace period is intended to be applied to premiums due after the initial premium has been made to secure coverage.”</p>	No	“All agents, brokers, and other licensees who accept payments on behalf of insurers must take steps to ensure that customers able to make payments have the ability to make prompt insurance payments through alternate methods of payment, such as online payment.”
	Bulletin – Premium Finance Cos. Press Release	04/10/2020	<ul style="list-style-type: none"> • Directs premium finance companies to provide their clients who are experiencing financial hardship due to COVID-19 with a 90-day grace period to pay for their insurance premiums during this challenging time due to circumstances beyond their control. 	Mandatory	<p>COVERED TIME PERIOD. 90 days.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Insurance premium finance companies.</p>	Yes	“All agents, brokers, and other licensees who accept payments on behalf of insurers must take steps

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> • Permits a policyholder to elect this 90-day emergency grace period to begin retroactively on April 1, 2020 or opt for the grace period to begin on May 1, 2020. • Provides that, during the extended grace period, premium finance companies must not cancel any insurance policy for nonpayment of installment payments for the term of the insurance policy. • Directs premium finance companies to: <ul style="list-style-type: none"> – Waive late payment fees, finance charges, and delinquency charges otherwise due and not report late payments to credit rating agencies during the 90-day period. – Allow premiums due but not paid during the 90-day period to be paid over either 12 months or the remainder of the current policy term, whichever is longer, except that a premium finance company may provide a longer repayment period. – Ensure that late payments during the 90-day period are not considered in any future premium calculations. • If renewal is due during the term of the grace period, allows the contract to be renewed with the same terms with client approval, even if the client has not paid the installment during the grace period. • Clarifies that the grace period is not intended to change the terms of the issued policy or be considered a forgiveness of installment payments. • Directs premium finance companies to post information on their website, provide each policyholder with an easily readable written description of the terms of the extended grace period offered pursuant to this guidance (which must be submitted to DOBI). 		<i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.		to ensure that customers able to make payments have the ability to make prompt insurance payments through alternate methods of payment, such as online payment.”
	Executive Order No. 123	04/09/2020	<ul style="list-style-type: none"> • Prohibits all insurance companies, HMOs, insurance premium finance companies, and other entities issuing health or dental benefit plans from canceling during the emergency grace period any policy or contract as a result of nonpayment. 	Mandatory	<p><i>COVERED TIME PERIOD.</i></p> <ul style="list-style-type: none"> • P&C, life, and premium finance companies – 90 days • Health companies, HMOs, etc. – 60 days <p><i>COVERED LINES.</i> All lines.</p>	Yes	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> For health policies, notes that the cost of the claim may not be recouped during or after the emergency grace period from the policyholder based upon the nonpayment of the premium. Authorizes DOBI to extend these emergency grace periods as needed. Requires entities to notify policyholders of the emergency grace period and exercise forbearances on collection documentation and other regulatory requirements, including with respect to late fees, interest, or other charges associated with delays in premium payments. At the conclusion of the grace period, requires the policyholder's unpaid premium to be amortized over a period of time. 		<p>COVERED ENTITIES. All insurance companies, HMOs, insurance premium finance companies, and other entities issuing health or dental benefit plans.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
NM	Bulletin 2020-006	03/20/2020	<ul style="list-style-type: none"> Requests that all insurance companies refrain from canceling or non-renewing policies of businesses and individuals negatively impacted by the disruption due to the non-payment of premiums during this public health emergency, or at a minimum, provide extended grace periods for payment of premiums. Requests that all insurance companies work with their insureds after the public health emergency is over to allow the insureds to catch up on past due premiums in installments without loss of coverage. 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 their insurance payments. 	Voluntary	<p>COVERED TIME PERIOD. Minimum of 30 days after state of emergency is declared over (to give policyholder chance to pay amount owed).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All admitted and non-admitted insurance companies that provide any insurance coverage in New Mexico.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	“[A]ll insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers [should] take steps to ensure that customers have the ability to make their insurance payments.”
NY	Health Emerg. Reg. FAQs	04/21/2020	<ul style="list-style-type: none"> Details the insurers and the types of accident and health coverage subject to the emergency regulation. Clarifies that if a policyholder experiencing a hardship has not paid outstanding premiums by June 2, they can be terminated as of that date, provided they are not otherwise entitled to a contractual grace period at that time and offers related examples. Clarifies what constitutes a written attestation sufficient to demonstrate financial hardship. 	Clarification of regulatory action		No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> • Notes that the regulation prohibits retroactive termination of the policy and provides that the insurer is responsible for paying claims that would otherwise be payable for the period covered by the regulation. • Suggests that, during the COVID-19 pandemic, insurers should make every effort possible to work with policyholders and contract holders experiencing a financial hardship to make accommodations for alternative payment arrangements. • Notes that the emergency regulation requires licensed producers to provide policyholders notice of the provisions of the regulation within 10 business days of the promulgation of the regulation and links to a model notice. 				
	P&C Emerg. Reg. FAQs	04/21/2020	<ul style="list-style-type: none"> • Clarifies that the emergency regulation applies to P&C policyholders who demonstrate financial hardship due to COVID-19. • Notes that if the policyholder is an individual, the emergency regulation covers most P&C insurance policies, including auto, homeowners', and renter's insurance; for small businesses, it covers property, fire, commercial general liability, special multiperil, medical malpractice, workers' compensation, commercial auto (including livery and other for-hire vehicles), and commercial umbrella insurance. • Details how a policyholder may demonstrate financial hardship due to COVID-19 (e.g., submitting to the insurer/premium finance agency a statement that they swear or affirm in writing under penalty of perjury that they are experiencing financial hardship as a result of the COVID-19 pandemic). • Provides that after the moratorium expires, if the policyholder has failed to make a premium payment due to financial hardship as a result of COVID-19, the insurer cannot terminate or conditionally renew the policy immediately after the expiration of the moratorium based on the policyholder's past failure to pay the premium due to financial hardship as a result of COVID-19. 	Clarification of regulatory action		Yes	No

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			<ul style="list-style-type: none"> Clarifies that the emergency regulation only defers the effective date of an otherwise permitted termination or conditional renewal and does not prescribe the creation of a new full policy term. 				
	ELANY Bulletin 2020-18	04/21/2020	<ul style="list-style-type: none"> Clarifies that the DFS moratorium/grace period/notice emergency regulation does not apply to a commercial lines insurance policy issued by an excess line insurer and will not affect any such policy's cancellation provisions, <u>except as respects any excess line commercial fire insurance policy.</u> 	Clarification of regulatory action		No	No
	Emerg. Reg. Press Release	04/09/2020	<ul style="list-style-type: none"> Requires individual and small group commercial health insurance plans to provide the following relief to consumers and businesses who can demonstrate financial hardship due to COVID-19: <ul style="list-style-type: none"> Defer payments of commercial health insurance premiums through June 1, 2020 and continue paying claims during this period. Waive late payment fees otherwise due, and not report late payments to credit rating agencies. Work with individuals to help them transition to new coverage, if appropriate. Requires producers who procured the policy for the policyholder/contract holder to mail or deliver notice to the policyholder/contract holder the provisions of the emergency regulation within 10 business days of promulgation. Clarifies that the grace period does not constitute a waiver or forgiveness of the premium. 	Mandatory	<p>COVERED TIME PERIOD. The later of the expiration of the applicable contractual grace period and June 1, 2020.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. Health insurers, HMOs, and student health plans.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
	ELANY Bulletin 2020-07	04/06/2020	<ul style="list-style-type: none"> Clarifies that the DFS has confirmed to ELANY that the moratorium, premium payment grace period, and notice requirements do not apply to excess line commercial policies and policyholders, but do apply to excess line personal lines policies and policyholders. 	Clarification of regulatory action		No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
	Emerg. Reg.	03/30/2020	<ul style="list-style-type: none"> • Provides certain protections to insureds who do not make a timely premium payment to life insurers, property/casualty insurers, or fraternal benefit societies—such as an extension of a grace period for the payment of premium and fees, protection from late payment fees, a prohibition against referral to a credit reporting agency/debt collection agency, and an extension of one ear to pay overdue premiums or fees. • Prohibits premium finance agencies from canceling an insurance policy due to an insured’s failure to make a timely installment payment for a period of at least: <ul style="list-style-type: none"> – 60 days, including any contractual grace period, for a property/casualty insurance policy or – 90 days, including any contractual grace period, for a life insurance policy if the insured can demonstrate financial hardship as a result of COVID-19. 	Mandatory	<p>COVERED TIME PERIOD.</p> <ul style="list-style-type: none"> • P&C—60 days • Life/Annuities—90 days <p>COVERED LINES. P&C; life, annuities (individuals, small businesses, certificate-holders under group policies).</p> <p>COVERED ENTITIES. P&C, life insurers, premium finance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes (DFS regulates pre fi)	No
	Insurance Circular Letter No. 7	03/19/2020	<p>Urges all regulated entities to alleviate the adverse impacts caused by COVID-19 on consumers and small businesses by:</p> <ul style="list-style-type: none"> – 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. – Working with consumers to avoid cancelation 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. – Increasing resources as necessary to accommodate increased claim submissions and increased inquiries from consumers about policy coverage benefits, etc. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines (applies to all regulated entities) providing coverage to consumers and small businesses.</p> <p>COVERED ENTITIES. DFS regulated insurance entities.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
NC	Bulletin 20-B-06 Bulletin 20-B-07 Extended Order	03/27/2020 04/21/2020	<ul style="list-style-type: none"> • Clarifies that—following the state’s order activating the state of disaster automatic stay of proof of loss requirements and premium debt deferrals—all insurance companies and premium finance companies must give their customers the option of deferring premium or debt payments that are due during the earlier of (1) the time period covered by the declaration or (2) the time period prior to expiration of the Commissioner’s order. • Notes that the deferral period is 20 days from the last day the premium or debt payment may be made under the terms of the contract. 	Mandatory	<p>COVERED TIME PERIOD. Through May 27, 2020.</p> <p>COVERED LINES. Not specified, but likely all lines.</p> <p>COVERED ENTITIES. All insurance companies, HMOs, MEWAs, surplus lines insurers, the underwriting associations, premium finance companies, and others subject to North Carolina’s insurance laws</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes (DOI regulates pre fi)	No
	Press Release	03/24/2020	<ul style="list-style-type: none"> • Asks the state’s insurance industry to consider the following actions: <ul style="list-style-type: none"> – Relax due dates for premiums payments. – Extend grace periods. – Waive late fees and penalties. – Allow payment plans for premiums payments to otherwise avoid a lapse in coverage. – Consider cancelation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage • Requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers are able to make premium payments in safe manner including online payments. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Not specified, but likely all lines</p> <p>COVERED ENTITIES. “Insurance industry.”</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	“[A]ll insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers [should] take steps to ensure that customers are able to make premium payments in safe manner.”
ND	Bulletin 2020-8	03/30/2020	<ul style="list-style-type: none"> • Urges insurers, producers, adjusters, etc. to provide flexibility and possible relief from certain insurance requirements to consumers and businesses impacted by COVID-19, including: <ul style="list-style-type: none"> – Extension of premium payment deadlines. – Extension of existing premium grace periods. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Not specified, but likely all lines.</p>	No (NDID regulates pre fi, but pre fi companies are not)	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> - Additional time before non-renewals or cancellations become effective. - Extension of proof of loss deadlines. - 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 the public health crisis. - Development of payment plan options for consumers and businesses who are facing financial hardship. 		<p>COVERED ENTITIES. Insurers, producers, adjusters, and other persons licensed and authorized to transact the business of insurance within the state of North Dakota.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	transacting the business of insurance)	
OH	Bulletin 2020-07	03/30/2020	<ul style="list-style-type: none"> • Orders insurers to provide their insureds with at least a 60-day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during the state of emergency. • States that this means insurers should offer payment accommodations (e.g., allow consumers to defer payments at no cost, extend payment due dates, or waive late or reinstatement fees) where consumers are unable to make timely payments of premium or fees due to COVID-19-related disruptions. • Does not require insurers to waive any premiums or other consideration owed on any policy or contract during this period of time. • Anticipates that a failure to pay premiums or remit consideration by the end of the grace period may subject the policy to a retroactive cancellation, in accordance with the policy terms. • Orders insurers to provide at least a 60-day grace period as to any policy provision that imposes a time limit on an insured or claimant to perform any act, including the submission of information or funds, with respect to a contract for insurance. • Does not prohibit an insurer from canceling or non-renewing a policy for any lawful reason other than nonpayment of the premium. 	Mandatory	<p>COVERED TIME PERIOD. Until the expiration of the state of emergency declared by the Governor on March 9, 2020.</p> <p>COVERED LINES. P&C, life, and long-term care.</p> <p>COVERED ENTITIES. Insurers providing P&C, life, and long-term care insurance policies in Ohio.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No
	Bulletin 2020-03	03/20/2020	<ul style="list-style-type: none"> • Directs insurers to comply with several requirements during the state of emergency, including giving their insureds the option of deferring premium payments coming due, interest free, for up to 60 calendar days from each original premium due date. 	Mandatory	<p>COVERED TIME PERIOD. Until the expiration of the state of emergency declared by the Governor on March 9, 2020.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
					<p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All health plan issuers (insurance companies, stop loss insurers, health insuring corporations, MEWAs, etc.).</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
OK	Bulletin 2020-1 (amended)	04/06/2020	<ul style="list-style-type: none"> • Requires P&C carriers to extend any applicable grace period for nonpayment of premiums by 45 days. • Clarifies that this does not relieve an insured of the obligation to pay premiums but merely is a deferral of the payment due date. • Notes that this provision also applies to premium financing arrangements. • Directs P&C carriers to suspend all claims reporting deadlines for the duration of the emergency declaration and extend all policyholder rights or benefits related to deadlines until 90 days after the state of emergency ends. 	Mandatory	<p>COVERED TIME PERIOD. Until the state of emergency is no longer in place.</p> <p>COVERED LINES. P&C.</p> <p>COVERED ENTITIES. All P&C insurers licensed in Oklahoma and premium financing companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes	No
	Bulletin 2020-02 (amended)	04/06/2020	<ul style="list-style-type: none"> • Prohibits health carriers from cancelling the coverage of any person who has been diagnosed with COVID-19 and is unable to return to work or maintain coverage under their current health carrier because of COVID -19 for the next 90 days. • Requires health carriers to extend the 30-day grace period to a 60-day grace period for nonpayment of premiums. • Notes that this provision is also applicable to premium financing arrangements. • Requires carriers to suspend underwriting rules related to group participation minimum requirements that would normally cause a group policy to be canceled. 	Mandatory	<p>COVERED TIME PERIOD. Until the state of emergency is no longer in place.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All health insurers licensed in Oklahoma and premium financing companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
OR	Emerg. Order	05/05/2020	<ul style="list-style-type: none"> • Requires health insurers issuing health insurance policies to give policyholders at least a 60-day grace period to pay the following premium payments: <ul style="list-style-type: none"> – Any premium amounts that, under the terms of a health insurance policy, will be due from the policyholder while the Order is in effect but that are not paid by the due date. – Any premium amounts that, under the terms of the health insurance policy, became due from the policyholder while the March 25, 2020 Order was in effect but that were not paid by the due date. – Any premium amounts that, under the terms of a health insurance policy, were due from the policyholder prior to the March 25 Order, were not paid as of March 25, 2020, and the insurer did not issue a notice of termination prior to March 17, 2020. • Notes that the required minimum grace period begins on the day the premium would have been due under the terms of the policy and runs for 60 consecutive calendar days. • Clarifies that a health insurer may provide a policyholder with a grace period longer than 60 days, provided it is offered in a nondiscriminatory manner. • Requires individual health insurance policies purchased using advance premium tax credits be provided a 3-month grace period in accordance with federal law. • Requires all insurers to take the following actions regarding cancellations and non-renewals: <ul style="list-style-type: none"> – Suspend all involuntary cancellations and non-renewals for all health insurance policies, with the exception of policies that have completed the applicable grace period required. – Pay claims incurred during the first month of a grace period, according to the terms of the policy (note, during this period, insurers may not pend claims solely due to non-payment of premium, and may not recoup or claw back payment for claims incurred during this period). 	Mandatory	<p>COVERED TIME PERIOD. Through June 3, 2020.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. All insurers that provide any type of health insurance coverage in the state, with the exception of accidental death and dismemberment, disability, and long-term care insurance policies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No

State	State Resource	Date Issued	Summary	Mandatory/ Voluntary	Application	Applicable to Pre-Fi?	Agency Billing
			<ul style="list-style-type: none"> Following the end of the grace period, permits a health insurance policy to be cancelled or non-renewed, subject to the following requirements: <ul style="list-style-type: none"> A health insurer may not retroactively terminate a policy to a date any earlier than the last day of the first month of the grace period. A health insurer must provide notice of termination in accordance with the terms of the policy and Oregon law. For health insurance policies extended beyond the normal date of cancellation or non-renewal, provides that the premium for extended coverage may be determined by a health insurer in accordance with the terms of the policy, if applicable. Prohibits an insurer from canceling or non-renewing a policy because of a claim directly resulting from the circumstances of COVID-19, except in cases of fraud or intentional misrepresentation of a material fact as prohibited by the terms of the plan. Clarifies that the Order must not be construed to relieve insureds of the obligation to pay premium according to the terms of the policy. 				
	Emerg. Order New Release Extension of Order FAQs	03/25/2020 04/23/2020	<ul style="list-style-type: none"> Requires insurers take the following steps immediately: <ul style="list-style-type: none"> Extend all deadlines for insureds to report claims and communicate about claims. Take all practicable steps to provide opportunities to report claims or provide required communications related to claims via methods compatible with social distancing recommendations. Institute a grace period for premium payments on all insurance policies issued in the state. Orders all insurers to take the following actions regarding cancelations and non-renewals: <ul style="list-style-type: none"> Suspend all cancelations and non-renewals for active insurance policies. For insurance policies not yet cancelled or non-renewed as of the date of the Order, but for which a notice of cancellation or non-renewal has been issued, withdraw the issued notice and provide insureds with a notice that 	Mandatory	<p>COVERED TIME PERIOD. Through May 23, 2020 (through May 5, 2020 for health insurers).</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Admitted insurers and all insurance policies issued or delivered in Oregon.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	“[A]ll insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers [should] take steps to ensure that customers have the ability to make prompt insurance payments while also maintaining social distancing guidelines.”

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			<p>cancellation and non-renewal is suspended until the Order is no longer in effect.</p> <ul style="list-style-type: none"> • Clarifies that, following the expiration of the Order, entities transacting insurance may resume cancelations and non-renewals. • For policies extended beyond the normal date of cancelation or non-renewal, permits insurers to continue to bill the insureds for this premium amount, but prohibits them from canceling or non-renewing coverage due to non-payment of the extended premium amount until the Order is no longer in effect. • Prohibits an insurer from canceling or non-renewing a policy because of a claim directly resulting from the circumstances of COVID-19, except in cases of fraud or intentional misrepresentation of a material fact as prohibited by the terms of the plan. • 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 while also maintaining social distancing guidelines. 				
PA	Notice 2020-04	03/19/2020	<ul style="list-style-type: none"> • Encourages regulated entities and individuals to consider several actions, including 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. • Advises that insurers should consider cancelation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. P&C, accident and health and life.</p> <p>COVERED ENTITIES. All licensed insurance companies.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	No	No
RI	Bulletin 2020-4	03/25/2020	<ul style="list-style-type: none"> • Requests that insurers do the following: <ul style="list-style-type: none"> – 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 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Not specified, but likely all lines.</p>	No	No

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			<p>whatever other measures necessary to assist insureds in avoiding or delaying cancelation or a lapse of insurance coverage.</p> <ul style="list-style-type: none"> - Institute alternative methods of payment for those insureds whose normal method of payment is affected by this emergency like electronic payments. - 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. - Explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance and/or issuance of coverage. <ul style="list-style-type: none"> • Clarifies that none of these requests are intended to change the terms of in force insurance policies or be considered a forgiveness of premium. 		<p>COVERED ENTITIES. Insurers writing business in Rhode Island.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>		
SC	Bulletin No. 2020-02	03/25/2020	<ul style="list-style-type: none"> • Advises insurers, HMOs, and other licensed or authorized entities that they should work with citizens and businesses to provide relief in the by the following: <ul style="list-style-type: none"> - Extend deadlines of premium payments. - Give additional time before non-renewals or cancelations become effective. - Extend proof of loss deadlines. - 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 the COVID-19 pandemic. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers, HMOs, adjusters, producers, and other licensed or authorized entities and individuals.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	Yes (DOI regulates pre fi)	No
SD	Bulletin 20-02	03/25/2020	<ul style="list-style-type: none"> • Urges health carriers to make reasonable accommodation for premium payments prior to cancelation and refrain from canceling coverage for individuals that have been diagnosed with COVID-19 (i.e., carriers may elect to extend premium grace periods). 	Voluntary	<p>COVERED TIME PERIOD. June 30, 2020.</p> <p>COVERED LINES. Health.</p> <p>COVERED ENTITIES. Health carriers providing coverage through health benefit plans.</p>	No	No

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					<i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.		
TN	Bulletin 20-05	04/03/2020	<ul style="list-style-type: none"> • Encourages premium finance companies, 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 under premium finance agreements. • Encourages insurance carriers to work with premium finance companies to facilitate any grace period modifications. 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> Not specified, but likely all lines.</p> <p><i>COVERED ENTITIES.</i> Premium finance companies and insurance carriers.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	Yes (DFI regulates pre fi)	No
	Bulletin 20-03 Press Release	03/24/2020	<ul style="list-style-type: none"> • Requests that insurers work with policyholders who have concerns about their ability to timely pay their premiums to ensure that they can maintain their existing insurance coverage. • Asks carriers to explore ways to eliminate late fees, non-sufficient funds fees, and installment fees. • Asks carriers to explore ways to streamline administrative processes and paperwork to facilitate continuous coverage and ease burdens on policy holders. 	Voluntary	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> All lines.</p> <p><i>COVERED ENTITIES.</i> Carriers writing insurance coverage in Tennessee.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No

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TX	Bulletin B-0007-20	03/23/2020	<ul style="list-style-type: none"> • Encourages carriers to use grace periods for payments, temporary suspension of premium payments, payment plans, and other actions to allow continuing insurance coverage as appropriate. • Notes that the Department will work with carriers to minimize the regulatory effects of an insurer's actions to provide policyholder relief, specifically for financial review requirements. • Clarifies that the suspension of premiums is not intended to mean the forgiveness of the premium. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. All insurers licensed to write life and accident and health insurance, HMOs, agents, TPAs, MEWAs, all insurance companies writing P&C, premium finance companies, etc.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (while TDI regulates pre fi, the operative language refers to carriers)	No
UT							
VT	Guidance	N/A	<ul style="list-style-type: none"> • 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. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Commercial lines.</p> <p>COVERED ENTITIES. "Insurance carriers."</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No	No
VA	Bulletin	03/27/2020	<ul style="list-style-type: none"> • Encourages those it regulates to consider taking the following actions: <ul style="list-style-type: none"> – 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. – Considering cancellation or non-renewal or policies only have exhausting all other reasonable efforts to work with policyholders to continue coverage. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Health and accident and health; P&C.</p> <p>COVERED ENTITIES. All insurers licensed to write life and accident and health insurance, HMOs, MEWAs, all insurance companies writing P&C</p>	No (while SCC BOI regulates pre fi, the operative language refers to insurers)	No

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					insurance, MGAs, premium finance companies, etc. <i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.		
WA	Emerg. Order No. 20-04 Press Release	04/03/2020	<ul style="list-style-type: none"> Requires a grace period of at least 60 days for all stand-alone dental plans certified by the Washington Health Benefit Exchange as qualified dental plans. For individual and group health plans, requires insurers to allow a grace period for payment of premiums of at least 60 days. 	Mandatory	<p><i>COVERED TIME PERIOD.</i> Though May 23, 2020.</p> <p><i>COVERED LINES.</i> Health and stand-alone dental.</p> <p><i>COVERED ENTITIES.</i> All persons subject to regulation by the Office of the Insurance Commissioner.</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	Yes (OIC regulates pre fi)	No
	Emerg. Order No. 20-03 Press Release	03/25/2020	<ul style="list-style-type: none"> Requires insurers, insurance producers, surplus lines brokers, and others that sell property and casualty policies in Washington to: <ul style="list-style-type: none"> Provide a grace period for non-payment of premium and waive otherwise applicable charges/fees associated with non-payment. Not cancel a policy issued for non-payment of premium, unless specifically directed to do so by the insured. 	Mandatory	<p><i>COVERED TIME PERIOD.</i> Though May 9, 2020.</p> <p><i>COVERED LINES.</i> P&C.</p> <p><i>COVERED ENTITIES.</i> All insurers authorized or admitted to transact P&C in Washington and all entities regulated by the Insurance Commissioner (i.e., insurance producers, surplus lines brokers, etc.).</p> <p><i>COVERED POLICIES</i> (i.e., New and/or Renewal). Both.</p>	Yes (OIC regulates pre fi)	No
WV	Bulletin No. 20-07	03/26/2020	<ul style="list-style-type: none"> Notes that insurers must not issue a cancellation notice or nonrenewal notice pertaining to any insurance policy during the COVID-19 pandemic. Clarifies that the protections are not meant to prohibit the cancellation or non-renewal of all insurance policies and that they 	Mandatory	<p><i>COVERED TIME PERIOD.</i> No clear end-date provided.</p> <p><i>COVERED LINES.</i> All lines.</p>	Unclear (depends on whether OIC regulates pre fi)	No

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			<p>do not apply to insureds or policyholders who were already delinquent or who were or are canceled/non-renewed for other valid underwriting reasons.</p> <ul style="list-style-type: none"> • Instructs that insurers can, and should, require validation that the adverse circumstances of the insured or policyholder are directly related to the COVID-19 pandemic by obtaining evidence in writing or otherwise from an employer, policyholder, insured, or other appropriate source before foregoing a cancellation or non-renewal. 		<p>COVERED ENTITIES. Insurers, other regulated entities, and consumers.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>		
	Emerg. Order 20-EO-02	03/18/2020	<ul style="list-style-type: none"> • Prohibits insurers, producers, and all other insurance-related entities from issuing 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. • Advises that insurers and other regulated entities should be flexible with respect to allowing alternative payment arrangements for the satisfaction of premiums that are due or that which may become delinquent as a result of the emergency. • Clarifies that nothing should be construed to exempt or excuse an insured from the obligation of paying the premiums otherwise due for insurance coverage/benefit actually provided or received. 	Mandatory	<p>COVERED TIME PERIOD. Until further notice.</p> <p>COVERED LINES. All lines.</p> <p>COVERED ENTITIES. Insurers, producers, and all other insurance-related entities subject to regulation.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). Both.</p>	Unclear (depends on whether OIC regulates pre fi)	No
WI	Bulletin	03/20/2020	<ul style="list-style-type: none"> • Encourages insurers to offer flexibility to insureds who are incurring economic hardship, including offering non-cancellation periods, deferred premium payments, premium holidays and acceleration or waiver of underwriting requirements. 	Voluntary	<p>COVERED TIME PERIOD. No clear end-date provided.</p> <p>COVERED LINES. Not specified, but likely all lines.</p> <p>COVERED ENTITIES. All insurers and interested parties.</p> <p>COVERED POLICIES (i.e., New and/or Renewal). No clarification offered, but likely that intent is to cover all policies.</p>	No (while DFI regulates pre fi, the operative language concerns insurers)	No

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WY							