

Fixed-Payment Benefits Plans Annual Report

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Insurance Commissioner - www.insurance.wa.gov

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Executive Summary

In 2007, the Washington state Legislature modified the definition of “health plan” in [RCW 48.43.005](#) to exclude fixed-payment insurance plans that are offered as a stand-alone benefit. Under [RCW 48.43.650](#), the Office of the Insurance Commissioner (OIC) must collect and report information regarding fixed-payment insurance on June 1st of each year.

The law exempts these products from complying with many mandated benefit requirements that apply to comprehensive medical insurance. Because this coverage is not comprehensive health insurance and the benefit amounts may be significantly less than the cost of care, insurers must provide a disclosure form to help consumers understand that the coverage will not pay the entire cost of most medical expenses or hospital care. The companies must use a standard disclosure form, which they must file with the OIC for approval.

Fixed-payment insurance policies pay a specific amount to people who receive certain types of medical care or services. Fixed-payment plans make these payments regardless of the actual amount of charges. For example, a plan might pay \$200 a day for each day that a consumer is in the hospital. Insurers sell these policies to individuals and to employer groups.

Group fixed-payment policies allow employees to buy coverage through their employers. Under a typical benefit design, there is a set dollar amount for a doctor visit—such as \$25 per visit—or a daily benefit amount for a hospital stay—such as \$200 per day. There is also a low calendar-year maximum. These payments usually cover only a fraction of the actual cost of medical services.

Proponents of the 2007 change testified that employers wanted to provide this limited coverage to their low-wage and seasonal employees to provide employees an option for some coverage. Opponents expressed concern that some employers would replace comprehensive medical coverage with these very limited plans, resulting in enrollees incurring uncovered medical costs or deferring treatment.

Since 2009, the OIC has conducted an annual survey of the insurers that offer fixed-payment insurance policies and has reported its findings to the Legislature. The enclosed report for June 1, 2022, is a result of the survey that the OIC sent to companies in January 2022. The companies reported data for the 2021 calendar year. In this report, we compare the 2021 data with data we collected in 2020, 2019, 2018 and 2017.

Annual Report

Survey

Each January, the OIC requires companies to complete a survey and submit data about their fixed-payment insurance policies. The survey questions are:

- Did you write fixed-payment policies in Washington State in 2021?
- Number of new fixed-payment policies issued in 2021 – group?
- Number of new fixed-payment policies issued in 2021 – individual?
- Number of new fixed-payment policy group enrollees in 2021?
- Number of new individual fixed-payment policy enrollees in 2021?
- Total number of enrollees on all fixed-payment policies as of December 31, 2021?
- Total number of existing fixed-payment policies in force as of December 31, 2021?
- Number of complaints from consumers that the Washington state Office of the Insurance Commissioner forwarded to the company regarding fixed-payment policies in 2021?

Data Summary

RCW 48.43.005 defines fixed-payment policies as specified disease or illness-triggered fixed-payment insurance, hospital confinement fixed-payment insurance, or other fixed-payment insurance offered as an independent, non-coordinated benefit. The benefits pay a fixed dollar amount to the insured person regardless of the actual amount of medical costs.

In 2021, we saw a slight increase in the numbers of companies writing fixed-payment policies. 48 companies reported that they sold fixed-payment policies to consumers as compared to 45 in 2019.

In 2021, Companies recorded 53 complaints as compared to 145 complaints in 2020.

Number of Companies that wrote Fixed-Payment Policies in WA

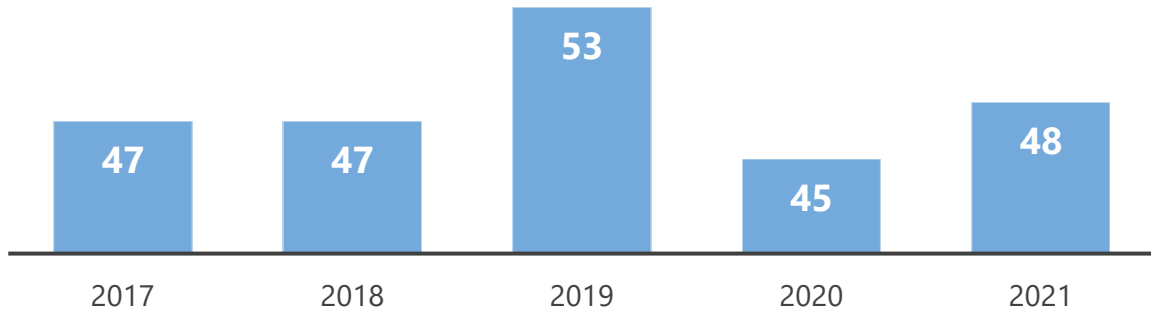


Figure 1: The total number of companies that wrote fixed-payment policies in WA increased slightly in 2021 from 45 to 48 (6.7% increase).

Source: Company responses to the OIC survey for 2021, 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Number of Consumer Fixed-Payment Plan Complaints filed with the OIC

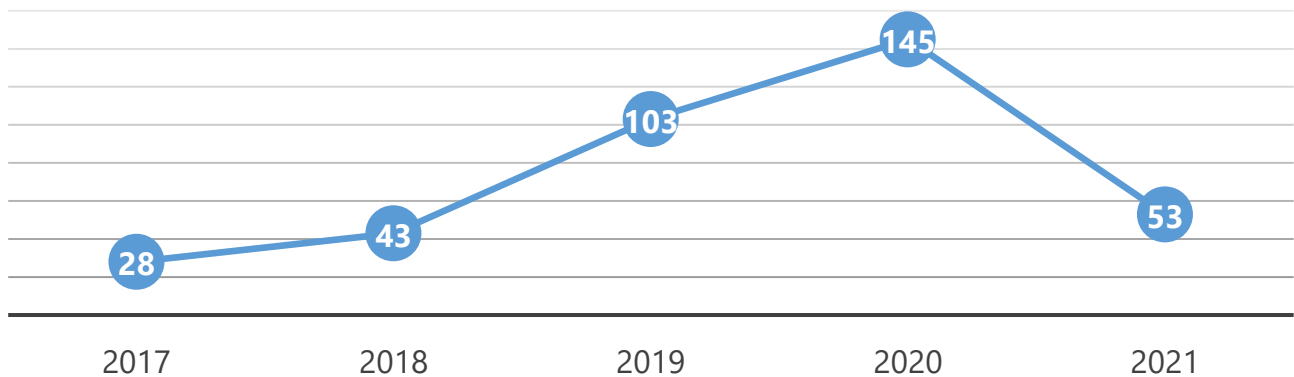


Figure 2: Companies reported a total of 53 consumer complaints in 2021. Compared to the 2020 count, the 2021 total shows a 63.4% decrease (change of 92 complaints).

Source: Company responses to the OIC survey for 2021, 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Group Market

- The 2021 survey indicates that 27 companies had active group policies with an increase of 56,427 (246.4%) group enrollees compared to the prior year. The 2020 survey showed that 20 companies sold group policies, with a decrease of 34,821 enrollees on new group policies from 2019 to 2020.
- The top 10 companies in the group market with a total of 75,310 new enrollees (96% of all new group enrollees):
 - Combined Insurance Company of America: 35,764
 - American Heritage Life Insurance Company: 7,969
 - Life Insurance Company of North America: 7,785
 - Unum Life Insurance Company of America: 7,230
 - Continental American Insurance Company: 3,967
 - Symetra Life Insurance Company: 3,429
 - Colonial Life & Accident Insurance Company: 2,911
 - Standard Insurance Company: 2,735
 - AAA Life Insurance Company: 2,245
 - US Br of Sun Life Assur Co of Canada: 1,275

Seven companies reported fewer than 1,000, but more than 200 new enrollees:

- Principal Life Insurance Company: 909
 - United of Omaha Life Insurance Company: 982
 - The Guardian Life Ins. Company of America: 438
 - Transamerica Life Insurance Company: 388
 - The Lincoln National Life Insurance Company: 376
 - Unum Insurance Company: 308
 - Assurity Life Insurance Company: 224
- Ten companies reported between 1 and 200 new group enrollees, for a combined total of 483 enrollees (0.68% of all new group enrollees).
 - Out of the 48 companies that did write fixed-payment policies in WA in 2021, 25 wrote group fixed-payment policies.

Individual Market

The market for fixed-payment insurance coverage does not meet the definition of a comprehensive health plan or the requirements under the Affordable Care Act (ACA) (Pub. L. No. 111-148 (2010)) and does not meet the ACA's requirement to purchase minimum essential coverage.

- In 2021, 30 companies sold 40,065 individual fixed-payment policies. In 2020, 31 companies sold a total of 29,505 individual policies (an increase of 35.8% individual policies sold from 2020 to 2021).

- In 2021, 10 companies issued 93.2% of all new individual policies sold in Washington, covering 51,387 individual enrollees.
- One company, American Family Life Assurance Company of Columbus dominated the individual market in Washington, with 10,239 new policies (28.6% of all new individual policies), and 18,215 new individual enrollees (33.6% of all new individual enrollees). This is a slight increase in from 2020, when American Family Life Assurance Company of Columbus reported 12,276 new individual enrollees.

The number of companies that are actively selling new individual fixed-payment policies decreased from 31 in 2020 to 30 in 2021. Fourteen companies reported decreases in new individual enrollees.

Total Number of WA Fixed-Payment Policies in Force

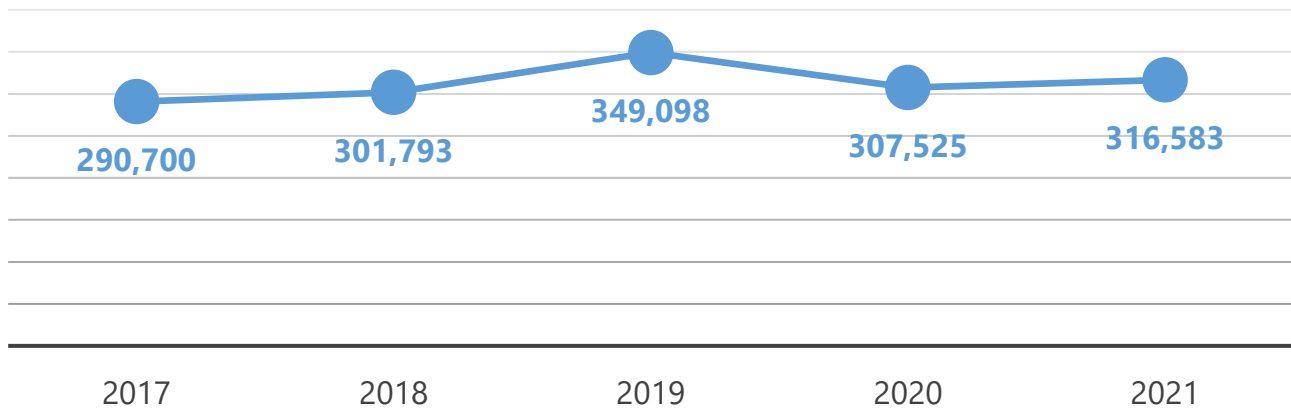


Figure 3: Companies reported a total of 316,583 policies in force. Compared to the 2020 cumulative totals, the 2021 cumulative policy totals show a 2.9% increase (9,058 policies).

Source: Company responses to the OIC survey for 2021, 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Total Number of WA Fixed-Payment Plan Enrollees

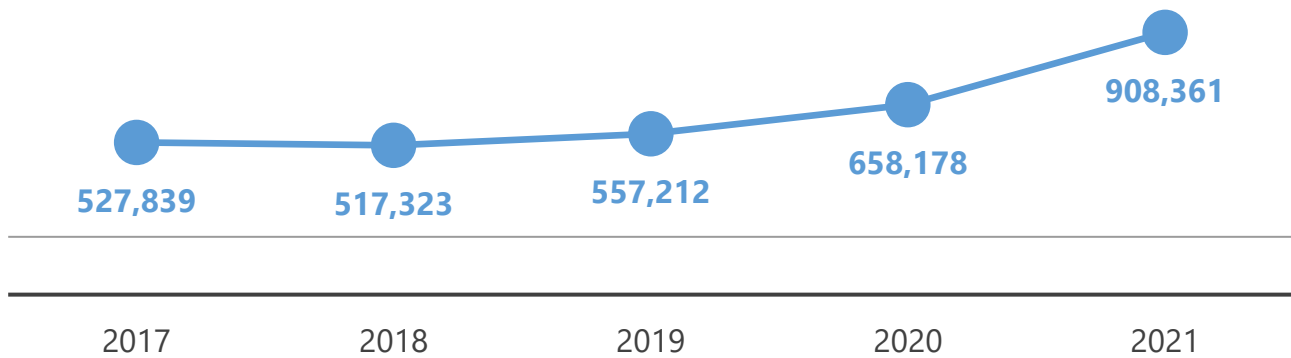


Figure 4: Companies reported a total of 908,361 enrolled members. Compared to the 2020 cumulative totals, the 2021 cumulative enrollment totals show a 38.0% increase (250,183 total enrollees) in overall enrollment.

Source: Company responses to the OIC survey for 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Fixed-Payment Policy Complaints

Across all 48 companies that wrote fixed-payment policies in 2021, there were 53 recorded complaints from consumers reported to the Washington Office of the Insurance Commissioner. This is a large reduction from previous years, with 145 complaints in 2020 and 103 complaints in 2019. The complaints reported in 2021 were all from 12 companies, with the top 3 accounting for 62.3% of all complaints.

Results Comparison

The 2021 survey data show that the number of new individual enrollees has increased by 24.4% from last year, while the number of new individual policies has increased by 21.4% from last year. The number of group policies and enrollees saw an even larger increase between 2020 and 2021, with a 369.8% increase in policies and a 246.4% increase in enrollees. This significant increase is largely attributable to one company, Combined Insurance Company of America, which issued 35,757 group policies in 2021, up from 68 group policies in 2020.

The growth in the fixed-payment enrollment from 2020 to 2021 of 38.0% is greater than the enrollment increase of 18.1% reported 2019 to 2020. This increase is not reflective of more companies writing fixed-payment policies, but instead of a larger number of enrollees and policies per company. Because policyholders can include spouses and dependents on their policies, there are a greater number of enrollees than policies. In 2021, across all companies, there was an average of 2.87 enrollees per policy, up from 2.14 in 2020, and 1.6 in 2019. Despite more enrollees, there has been a decrease in the number of complaints.

Total Number of New Individual and Group Policies

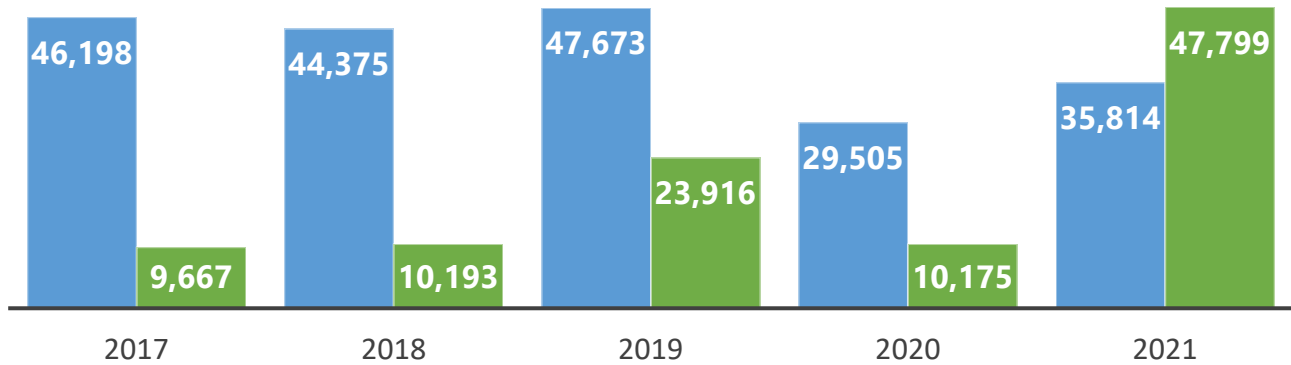


Figure 5: The total number of both individual and group policies increased from 2020 to 2021. Group policies saw the largest increase (369.8%), whereas the number of individual policies increased by a smaller margin (21.4%).

Source: Company responses to the OIC survey for 2021, 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Total Number of New Enrollees - Individual and Group Policies

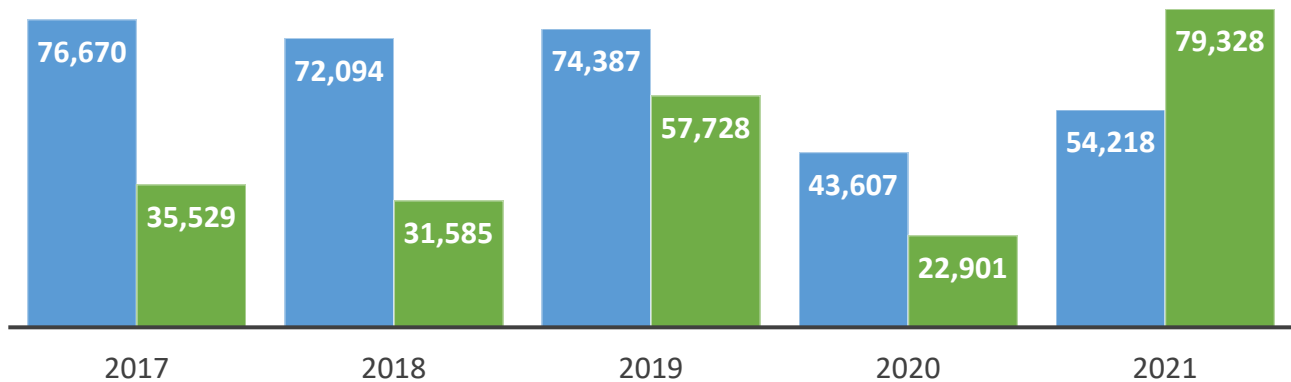


Figure 6: The total number of both individual and group enrollees increased from 2020 to 2021. Group enrollment saw the largest increase (246.4%), whereas individual enrollment increased by a smaller margin (24.4%).

Source: Company responses to the OIC survey for 2020, 2019, 2018 and 2017 benefit years. Data is reported based on benefit year, not survey year.

Appendix A

Sales of New Group Policies and Group Enrollees by Company

Name	2018 Group Policies	2018 Group Enrollments	2019 Group Policies	2019 Group Enrollments	2020 Group Policies	2020 Group Enrollments	2021 Group Policies	2021 Group Enrollments
AAA Life Insurance Co.	0	2750	0	2697	0	0	0	2245
Aetna Life Ins. Co.	3	138	2	631	0	0	1	48
American Fidelity Assur. Co.	2	61	2	98	18	141	30	125
American Heritage Life Ins. Co.	1619	2119	4130	7638	0	0	967	7969
Assurity Life Ins. Co.	72	100	125	181	121	153	167	224
Beazley Ins. Co. Inc.	1	24	2	92	0	0	3	41
Colonial Life & Accident Ins. Co.	3965	4464	4192	4724	2232	2232	2911	2911
Combined Ins. Co. of America	122	122	120	116	68	65	35757	35764
Companion Life Ins. Co.	0	0	3	297	0	102	0	19

Continental America Ins. Co.	13	2328	45	2858	29	1526	31	3967
Federal Ins. Co.	0	0	3	121	2	135	5	128
Guardian Life Ins. Co. of America	28	779	26	761	34	1142	25	438
Life Ins. Co. of N. America	1	0	11	658	7	4263	12	7785
Lincoln National Life Ins. Co.	233	337	9	772	0	0	2	376
Principal Life Ins. Co	39	592	39	592	52	734	86	909
Prudential Ins. Co. of America	2	79	3	427	0	0	2	82
Reliastar Life Ins. Co	8	312	7	12248	0	0	0	0
Standard Ins. Co.	19	639	9	129	14	594	10	2735
Transamerica Life Ins. Co.	471	687	306	462	138	246	186	388
Transamerica Premier Life Ins. Co.	1	1	3	3	0	0	0	0
Trustmark Ins. Co.	11	18	4	4	2	4	16	23

United of Omaha Life Ins. Co.	8	353	3	10	20	596	20	892
Unum Life Ins. Co. of America	3570	15131	14864	19983	7417	7417	7230	7230
US Br. Sun. Life Assur. Co. of Canada	3	172	8	2226	8	580	20	1275

Sales of New Individual Policies and Individual Enrollees by Company

Name	2018 Individual Policies	2018 Individual Enrollments	2019 Individual Policies	2019 Individual Enrollments	2020 Individual Policies	2020 Individual Enrollments	2021 Individual Policies	2021 Individual Enrollments
American Family Life Assur. Co. of Columbus	23054	43558	24284	45912	12276	22602	10239	18215
American Fidelity Assurance Co.	893	1141	401	508	130	130	122	221
American General Life Ins. Co.	29	29	30	30	26	26	0	0
American Heritage Life Ins. Co.	0	0	255	456	0	0	95	44
American Income Life Ins. Co.	651	1042	704	1042	521	785	422	584
Assurity Life Ins. Co.	3	5	3	5	9	17	8	11
Bankers Fidelity Life Ins. Co.	5	5	1	1	0	0	0	0
Bankers Life & Casualty Co.	470	471	368	368	455	455	8121	8121
Chesapeake Life Ins. Co.	2540	3417	3567	4779	3871	5145	4140	5418
Colonial Life & Accident Ins. Co.	10745	13429	11525	13699	6955	6955	7364	7364
Combined Ins. Co. of America	515	920	369	591	387	577	713	894
Continental Life Insurance Company of	0	0	7	7	83	83	255	255

Brentwood TN								
Equitable Life & Cas Ins. Co.	0	0	1	1	0	0	0	0
Family Heritage Life Ins. Co. of America	696	1588	1173	2332	576	1085	610	1003
Federal Ins. Co.	238	238	1	73	1	45	3	36
Globe Life & Accident Ins. Co.	339	339	329	329	394	394	407	407
Guarantee Trust Life Ins. Co.	221	224	224	229	232	232	425	425
Guardian Life Ins. Co. of America	3	11	4	8	6	7	6	9
Illinois Mutual Life Ins. Co	1	1	5	5	2	2	4	4
LifeSecure Ins. Co.	28	28	240	311	486	585	213	263
Loyal American Life Ins. Co.	72	114	87	125	132	186	199	241
Medico Ins. Co.	233	233	463	463	593	593	394	395
Minnesota Life Ins. Co.	0	0	1	6	3	3	9	9
Mutual of Omaha Ins. Co.	471	568	592	704	680	774	681	745
National Health Insurance Company	0	0	0	0	48	62	40	46
Provident Life & Accident Ins. Co.	0	0	1366	388	921	1979	612	8618

Securian Life Ins. Co.	26	39	226	318	0	0	0	0
Sentinel Security Life Insurance Co.	0	0	7	7	0	0	0	0
State Farm Mutual Auto Ins. Co	757	805	586	637	309	355	241	271
Tier One Insurance Company	0	0	0	0	0	0	80	119
Time Insurance Co.	1562	2020	100	123	0	0	0	0
Transamerica Life Ins. Co.	250	336	154	206	89	125	58	84
Trustmark Ins. Co.	305	408	183	264	108	182	16	21
United America Ins. Co.	33	33	8	12	1	1	23	38
United Transportation Union Ins. Assn.	30	72	24	69	0	0	126	166

Cumulative Total of Existing Policies and Enrollees by Company

Company Name	Did you write Fixed-Payment Policies in WA in 2021?	2021 Total Enrollment	2021 Total Existing Policies
4 Ever Life Insurance Company	N	0	0
AAA Life Insurance Company	Y	19131	1
Acadia Insurance Company	N	0	0
Ace American Insurance Company	N	0	0
Ace Fire Underwriters Insurance Company	N	0	0
Ace Life Insurance Company	N	0	0
Ace Property and Casualty Insurance Company	N	0	0
Aetna Health and Life Insurance Company	N	0	0
Aetna Life Insurance Company	Y	884	4
AIG Property Casualty Company	N	0	0
AIU Insurance Company	N	0	0
All Savers Insurance Company	N	0	0
Allianz Life Insurance Company of North America	N	0	0
Allstate Assurance Company	N	0	0
Allstate Life Insurance Company	N	0	0
American Bankers Insurance Company of Florida	N	0	0
American Bankers Life Assurance Company of Florida	N	0	0
American Family Life Assurance Company of Columbus (Aflac)	Y	234089	114245
American Family Life Insurance Company	N	0	0
American Family Mutual Insurance Company S.I.	N	0	0
American Fidelity Assurance Company	Y	6541	3072
American General Life Insurance Company	N	1212	1212
American Health and Life Insurance Company	N	66	55
American Heritage Life Insurance Company	Y	115300	5389
American Home Assurance Company	N	0	0
American Income Life Insurance Company	Y	12710	8957
American National Insurance Company	N	6	3
American National Life Insurance Company of Texas	N	0	0
American Public Life Insurance Company	N	0	0
American Republic Insurance Company	N	24	18
American-Amicable Life Insurance Company of Texas	N	0	0
Ameritas Life Insurance Corp.	N	0	0
AMEX Assurance Company	N	0	0
Annuity Investors Life Insurance Company	N	0	0
Aspen American Insurance Company	N	0	0
Assurity Life Insurance Company	Y	514	342

Atlantic Coast Life Insurance Company	N	0	0
Auto Club Life Insurance Company	N	0	0
Bankers Fidelity Life Insurance Company	N	0	0
Bankers Life and Casualty Company	Y	16910	15883
Bankers Standard Insurance Company	N	0	0
BCS Insurance Company	Y	1062	31
Beazley Insurance Company Inc.	Y	81	4
Brighthouse Life Insurance Company	N	0	0
Capitol Indemnity Corporation	N	0	0
Central States Health & Life Company of Omaha	N	0	0
Century Indemnity Company	N	0	0
Chubb National Insurance Company	N	0	0
Cigna National Health Insurance Company	N	0	0
Clear Blue Insurance Company	N	0	0
Clover Insurance Company	N	0	0
Colonial Life & Accident Insurance Company	Y	35146	34995
Columbus Life Insurance Company	N	0	0
Combined Insurance Company of America	Y	54722	50481
Companion Life Insurance Company	N	33	2
CompBenefits Insurance Co.	N	0	0
Continental American Insurance Company (CAIC)	Y	47795	134
Continental General Insurance Company	N	0	299
Continental Life Insurance Company of Brentwood TN	Y	352	352
Continental Western Insurance Company	N	0	0
Cotton States Life Insurance Company	N	0	0
Country Investors Life Assurance Company	N	0	0
Country Life Insurance Company	N	0	0
Dairyland American Insurance Company	N	0	0
Delaware Life Insurance Company	N	0	0
Equitable Financial Life and Annuity Company	N	0	0
Equitable Financial Life Insurance Company	N	0	0
Equitable Financial Life Insurance Company of America	N	0	0
Executive Risk Indemnity Inc	N	0	0
Family Heritage Life Insurance Company of America	Y	11084	4912
Family Life Insurance Company	N	0	0
Federal Insurance Company	Y	3446	3446
Federated Life Insurance Co.	N	0	0
Federated Mutual Insurance Co.	N	0	0
Federated Service Insurance Co.	N	0	0
Fidelity Security Life Insurance Company	N	0	0
Firemen's Insurance Company of Washington D.C.	N	0	0
First Penn-Pacific Life Insurance	N	0	0
Garden State Life Insurance Company	N	0	0
General Star National Insurance Company	N	0	0
Generali US Branch	N	0	0

Genesis Insurance Company	N	0	0
Globe Life and Accident Insurance Company	Y	4042	4042
Golden Rule Insurance Company	N	0	0
Great American Life Insurance Company	N	0	0
Great Northern Insurance Company	Y	2349	2349
Guarantee Trust Life Insurance Company	Y	1862	1861
Hartford Life and Accident Insurance Company	N	0	0
Heritage Life Insurance Company	N	0	0
HM Life Insurance Company	N	0	0
Humana Benefits Plan of Illinois	N	0	0
Humana Insurance Co.	N	0	0
HumanaDental Insurance Co.	N	0	0
IA American Life Insurance Company	N	0	0
Illinois Mutual Life Insurance Company	Y	26	24
Independence Life and Annuity Company	N	0	0
Industrial Alliance Insurance and Financial Services Inc.	N	0	0
Insurance Company of North America	N	0	0
Integrity Life Insurance Company	N	0	0
Kansas City Life Insurance Company	N	0	0
Liberty National Life Insurance Company	N	0	0
Life Insurance Company of North America	Y	42683	45
LifeSecure Insurance Company	Y	418	359
LifeWise Assurance Company	N	0	0
Lincoln Benefit Life Company	N	0	0
Lincoln Life & Annuity Company of New York	N	0	0
Lincoln Life Assurance Company of Boston	N	0	0
Loyal American Life Insurance Company	Y	165	137
Madison National Life Insurance Company Inc.	N	0	0
Manhattan Life Insurance Company	N	0	0
Manhattan National Life Insurance Company	N	0	0
ManhattanLife Assurance Company of America	N	0	0
ManhattanLife of America Insurance Company	N	0	0
Medico Insurance Company	Y	1742	1738
Merit Life Insurance Co.	N	0	0
Metropolitan Life Insurance Company	N	4	4
Mid-West National Life Insurance Company of Tennessee	N	106	68
Midwestern United Life Insurance Company	N	0	0
Minnesota Life Insurance Company	Y	14	14
Monitor Life	N	0	0
MONY Life Insurance Company	N	0	0
Mutual of Omaha Insurance Company	Y	2638	2285
Nassau Life and Annuity Company	N	0	3
Nassau Life Insurance Company of Kansas	N	0	0
National Farmers Union Property and Casualty	N	0	0
National Health Insurance Company	Y	918	648

National Teachers Associates Life Insurance Company	N	0	0
National Union Fire Insurance Company of Pittsburgh Pa.	N	0	0
Nationwide Life Insurance Company	N	0	0
New Hampshire Insurance Company	N	0	0
New York Life Insurance Company	N	0	0
Occidental Life Insurance Company of North Carolina	N	0	0
Ohio National Life Assurance Corporation	N	0	0
Old American Insurance Company	N	70	70
Omaha Insurance Company	N	0	0
Pacific Employers Insurance Company	N	0	0
Pacific Indemnity Company	N	0	0
PacifiCare Life and Health Insurance Company	N	0	0
PacifiCare Life Assurance Company	N	0	0
Palomar Specialty Insurance Company	N	0	0
Pan-American Life Insurance Company	N	0	0
Parker Centennial Assurance Company	N	0	0
PartnerRe Life Reinsurance Company of America	N	0	0
Physicians Life Insurance Company	N	0	0
Physicians Mutual Insurance Company	N	591	472
Pioneer American Insurance Company	N	0	0
Pioneer Security Life Insurance Company	N	0	0
Principal Life Insurance Company	Y	3080	216
Principal National Life Insurance Company	N	0	0
Professional Insurance Company	N	2	1
Protective Life and Annuity Insurance Company	N	0	0
Protective Life Insurance Company	N	0	0
Provident American Life & Health Insurance Company	N	0	0
Provident Life and Accident Insurance Company	Y	26300	11150
Provident Life and Casualty Insurance Company	N	0	0
QBE Insurance Corporation	N	0	0
QBE Reinsurance Corporation	N	0	0
ReliaStar Life Insurance Company	Y	26664	85
Reliastar Life Insurance Company of New York	N	0	0
RiverSource Life Insurance Company	N	1	1
Rx Life Insurance Company	N	0	0
S.USA Life Insurance Company Inc.	N	0	0
SBLI USA Life Insurance Company Inc.	N	0	0
Securian Life Insurance Company	N	376	195
Security Life of Denver Insurance Company	N	0	0
Sentinel Security Life Insurance Company	Y	1	1
Sentry Casualty Company	N	0	0
Sentry Insurance Company	N	0	0
Sentry Life Insurance Company	N	0	0
Sentry Select Insurance Company	N	0	0
ShelterPoint Insurance Company	N	0	0

Shenandoah Life Insurance Company	N	0	0
SILAC Insurance Company	N	14	14
Standard Insurance Company	Y	3989	59
Standard Life & Accident Insurance Company	N	26	23
Standard Security Life Insurance Company of New York	N	24	16
State Farm Mutual Automobile Insurance Company	Y	7164	6082
Sterling Life Insurance Company	N	0	0
Sun Life and Health Insurance Company (U.S.)	N	0	0
Sunset Life Insurance Company of America	N	0	0
Surety Life Insurance Company	N	0	0
Sutton National Insurance Company	N	0	0
Symetra Life Insurance Company	Y	4939	10
Talcott Resolution Life Insurance Company	N	0	0
Talcott Resolution Life and Annuity Insurance Company	N	2	4
The Chesapeake Life Insurance Company	Y	9082	6833
The Guardian Life Insurance of America	Y	3470	122
The Insurance Company of the State of Pennsylvania	N	0	0
The Lafayette Life Insurance Company	N	0	0
The Lincoln National Life Insurance Company	Y	161921	691
The North River Insurance Company	N	0	0
The Ohio National Life Insurance Company	N	0	0
The Paul Revere Life Insurance Company	N	0	0
The Prudential Insurance Company of America	Y	1106	8
The Union Labor Life Insurance Company	N	61	45
The United States Life Insurance Company in the City of New York	N	1818	1818
The Western and Southern Life Insurance Company	N	29	34
Thrivent Financial for Lutherans	N	22	19
Tier One Insurance Company (TOIC)	Y	80	119
Transamerica Casualty Insurance Company	N	0	0
Transamerica Financial Life Insurance Company	N	28	4
Transamerica Life Insurance Company	Y	3339	1682
Trustmark Insurance Company	Y	290	195
Trustmark Life Insurance Company	N	0	0
U.S. Financial Life Insurance Company	N	0	0
Unified Life Insurance Company	N	4	4
Unimerica Insurance Company	N	0	0
Union Fidelity Life Insurance Company	N	0	0
Union Insurance Company	N	0	0
United American Insurance Company	Y	452	256
United of Omaha Life Insurance Company	Y	1858	57
United States Branch of the Sun Life Assurance Company of Canada	Y	3101	39
United States Fire Insurance Company	N	0	0
United Transportation Union Insurance Association	Y	565	305

United World Life Insurance Company	N	0	0
UnitedHealthcare Insurance Company	N	0	0
UnitedHealthcare Life Insurance Company	N	0	0
Unum Insurance Company	Y	308	308
Unum Life Insurance Company of America	Y	23743	23743
USAA Life Insurance Company	N	3	3
USAbble Life	N	2	2
Vantage Risk Assurance Company formerly known as Heritage Casualty Insurance Company	N	0	0
Venerable Insurance and Annuity Company	N	0	0
Vigilant Insurance Company	N	0	0
Voya Retirement Insurance and Annuity Company	N	0	0
Washington National Insurance Company	Y	5702	4424
West Coast Life Insurance Company	N	0	0
Westchester Fire Insurance Company	N	0	0
Western United Life Assurance Company	N	0	0
Western-Southern Life Assurance Company	N	0	0
Wilcac Life Insurance Company	N	0	0
Wilton Reassurance Company	N	0	0
Wilton Reassurance Life Company of New York	N	0	0
Woodmen of the World Life Insurance Society	N	59	59