



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

In Re:)
)
GRINNELL ADVISORY COMPANY) **Market Conduct Examination**
(NAIC #998 and #969)) **No. 353218**

ORDER OF THE DIRECTOR

NOW, on this 9th day of April, 2021, Director, Chlora Lindley-Myers, after consideration and review of the market conduct examination report of Grinnell Advisory Company (NAIC #998 and #969) (hereinafter "Grinnell"), examination report no. 353218, prepared and submitted by the Division of Insurance Market Regulation (hereinafter "Division") pursuant to §374.205.3(3)(a)¹, does hereby adopt such report as filed. After consideration and review of the Stipulation of Settlement ("Stipulation"), relating to the market conduct examination no. 353218, the examination report, relevant work papers, and any written submissions or rebuttals, the findings and conclusions of such report are deemed to be the Director's findings and conclusions accompanying this order pursuant to §374.205.3(4). The Director does hereby issue the following orders:

This order, issued pursuant to §374.205.3(4) and §374.046.15. RSMo, is in the public interest.

IT IS THEREFORE ORDERED that Grinnell and the Division having agreed to the Stipulation, the Director does hereby approve and agree to the Stipulation.

IT IS FURTHER ORDERED that Grinnell shall not engage in any of the violations of law and regulations set forth in the Stipulation, shall implement procedures to place it in full compliance with the requirements in the Stipulation and the statutes and regulations of the State

¹ All references, unless otherwise noted, are to Missouri Revised Statutes 2016, as amended or to the Code of State Regulations, 2020, as amended.

of Missouri, and to maintain those corrective actions at all times, and shall fully comply with all terms of the Stipulation.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri, this 19th day of April, 2021.



Chlora Lindley Myers

Chlora Lindley-Myers
Director

**IN THE DEPARTMENT OF COMMERCE AND INSURANCE
STATE OF MISSOURI**

In Re:)
)
GRINNELL ADVISORY COMPANY) **Market Conduct Examination**
(NAIC #998 and #969)) **No. 353218**

STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter “the Division”) and Grinnell Advisory Company (hereinafter “Grinnell”), as follows:

WHEREAS, the Division is a unit of the Missouri Department of Commerce and Insurance (hereinafter “the Department”), an agency of the State of Missouri, created and established for administering and enforcing all laws in relation to insurance companies doing business in the State of Missouri;

WHEREAS, Grinnell operates as an advisory organization in the State of Missouri pursuant to §379.328¹;

WHEREAS, the Division conducted a market conduct examination of Grinnell, examination #353218; and

WHEREAS, based on the market conduct examination of Grinnell, the Division alleges that:

1. Grinnell’s policy and procedures on anti-trust/anti-competitive practices did not conform to NAIC Market Regulation Handbook Best Practices.
2. Grinnell erroneously filed two policy forms in violation of 20 CSR 500-4.100 (5) (A).
3. Grinnell failed to file 39 circulars issued to members pertaining to filed advisory

¹All references, unless otherwise noted, are to Missouri Revised Statutes 2016, as amended or to the Code of State Regulations, 2020, as amended. .

loss cost and form filings in violation of §379.321 and 20 CSR 500-4.100 (5).

4. Grinnell advised its members that 23 forms were discontinued, even though Grinnell had not filed to withdraw the forms and stated that the forms would continue to be available to members.

5. Grinnell was unable to provide a copy of audit reports containing signatures of management obtained at the time the reports were submitted to management.

6. Grinnell was unable to provide evidence that the findings of two audit reports were provided to Grinnell's Chairman, and the President and Vice President of the Board.

7. Grinnell failed to provide notification to its members of six form filings filed on their behalf.

WHEREAS, the Division and Grinnell have agreed to resolve the issues raised in the market conduct examination as follows:

A. **Scope of Agreement.** This Stipulation of Settlement (hereinafter "Stipulation") embodies the entire agreement and understanding of the signatories with respect to the subject matter contained herein. The signatories hereby declare and represent that no promise, inducement or agreement not herein expressed has been made, and acknowledge that the terms and conditions of this agreement are contractual and not a mere recital.

B. **Remedial Action.** Grinnell agrees to take remedial action bringing it into compliance with the statutes and regulations of Missouri and agrees to maintain such remedial actions at all times, to reasonably ensure that the errors noted in the market conduct examination and in this Stipulation do not recur. Such remedial actions shall consist of the following:

1. Grinnell agrees to update its anti-trust provision and to implement either training materials or a signed confirmation from employees who are representatives of Grinnell that they

understand anti-trust laws and Grinnell's requirements.

2. Grinnell agrees to file circulars pertaining to future rate, rule or form filings with the Department at the time such information is sent to the member insurer as required by 20 CSR 500-4.100 (5).

3. Grinnell agrees that it will provide notification to its members of form filings filed on their behalf.

4. Grinnell agrees to file with the Department all circulars issued to members pertaining to advisory loss costs and form filings at the time such information is sent to the member insurer as required by 20 CSR 500-4.100 (5).

5. Grinnell agrees to timely advise members of forms that have been discontinued and not to utilize discontinued forms.

6. Grinnell agrees to timely notify members of form filings made on their behalf.

7. Grinnell agrees to include its Board Chairman and Executive Vice President on audit distribution lists such that they will receive audits reports in their entirety.

8. Grinnell agrees to implement new procedures for audits to include a management sign off of documents to be completed at the conclusion of the audit as well as instruction to obtain electronic signatures when response findings are communicated with the audit team.

C. **Compliance.** Grinnell agrees to file documentation with the Division, in a format acceptable to the Division, within 90 days of the entry of a final order of any remedial action taken pursuant to Paragraph B to implement compliance with the terms of this Stipulation. Such documentation is provided pursuant to §374.205.

D. **Ongoing Examination.** Grinnell agrees to pay any reasonable examination fees expended by the Division in conducting its review of the documentation provided by Grinnell

pursuant to Paragraph C of this Stipulation.

E. **Non-Admission.** Nothing in this Stipulation shall be construed as an admission by Grinnell, this Stipulation being part of a compromise settlement to resolve disputed factual and legal allegations arising out of the above-referenced market conduct examination.

F. **Waivers.** Grinnell, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights for procedural requirements, including notice and an opportunity for a hearing, and review or appeal by any trial or appellate court, which may have otherwise applied to the above-referenced market conduct examination.

G. **Changes.** No changes to this Stipulation shall be effective unless made in writing and agreed to by representatives of the Division and Grinnell.

H. **Governing Law.** This Stipulation shall be governed and construed in accordance with the laws of the State of Missouri.

I. **Authority.** The signatories below represent, acknowledge, and warrant that they are authorized to sign this Stipulation, on behalf of the Division and Grinnell respectively.

J. **Counterparts.** This Stipulation may be executed in multiple counterparts, each of which shall be deemed an original and all of which taken together shall constitute a single document. Execution and delivery of this Stipulation by facsimile or by an electronically transmitted signature shall be fully and legally effective and binding.

K. **Effect of Stipulation.** This Stipulation shall become effective only upon entry of a Final Order by the Director of the Department (hereinafter "Director") approving this Stipulation.

L. **Request for an Order.** The signatories below request that the Director issue an Order approving this Stipulation and ordering the relief agreed to in the Stipulation, and consent to the issuance of such Order.

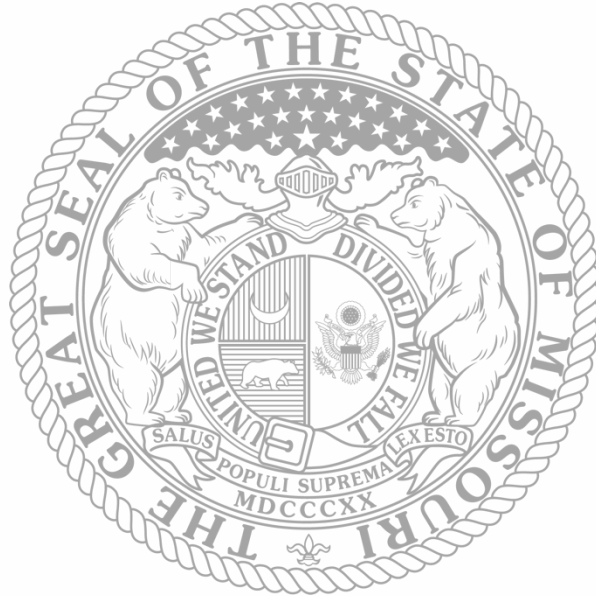
DATED: 3-3-2021



Stewart Freilich
Chief Market Conduct Examiner and
Senior Counsel
Division of Insurance Market Regulation

DATED: 3-1-2021

 President
[Name and Title]
Grinnell Advisory Company



FINAL MARKET CONDUCT EXAMINATION REPORT

Grinnell Advisory Company

MISSOURI SBS EXAMINATION # 353218

Examination End Date, December 28, 2020

**Home Office
4215 Highway 146, PO Box 790
Grinnell, IA 50112-0790**

**STATE OF MISSOURI
DEPARTMENT OF COMMERCE & INSURANCE**

JEFFERSON CITY, MISSOURI

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March 3, 2021

Honorable Chlora Lindley-Myers, Director
Missouri Department of Commerce and Insurance
301 West High Street, Room 530
Jefferson City, Missouri 65101

Director Lindley-Myers:

In accordance with your market conduct examination warrant, a targeted market conduct examination has been conducted of the specified business practices of

Grinnell Advisory Company

hereinafter referred to as GAC or as the Company. This examination was conducted as a desk examination at the offices of the Missouri Department of Commerce and Insurance (DCI).

FOREWORD

This examination report is a report by exception. However, failure to criticize specific practices, procedures, products or files does not constitute approval thereof by the DCI.

During this examination, the examiners cited errors considered potential violations made by the Company. Statutory citations were as of the examination period unless otherwise noted.

When used in this report:

- “Company” or “GAC” refers to Grinnell Advisory Company
- “CSR” refers to the Missouri Code of State Regulation
- “DCI” refers to the Missouri Department of Commerce and Insurance
- “Director” refers to the Director of the Missouri Department of Commerce and Insurance
- “NAIC” refers to the National Association of Insurance Commissioners
- “RSMo” refers to the Revised Statutes of Missouri

SCOPE OF EXAMINATION

The DCI has authority to conduct this examination pursuant to, but not limited to, §§374.110, 379.343, 374.205, RSMo, and conducted in accordance with section 379.475.3, RSMo.

The purpose of this examination was to determine if the Company complied with Missouri statutes and DCI regulations. The primary period covered by this review is January 1, 2017 through December 31, 2019, unless otherwise noted. Errors found outside of this time period may also be included in the report.

The examination was a targeted examination involving the following business functions:

- Advisory Organization Operations/Management/Governance
- Statistical Plans
- Correspondence with Insurers and States
- Data Collection and Handling
- Reports, Report Systems and Other Data Requests
- Classification and Appeal Handling
- Ratemaking Functions
- Inspection Services
- Form Development

The examination was conducted in accordance with the standards in the NAIC's *Market Regulation Handbook*. In performing this examination, examiners only reviewed a sample of the Company's practices, procedures, products, and files. Therefore, some noncompliant practices, procedures, products, and files may not have been found. As such, this report may not fully reflect all of the practices and procedures of the Company.

COMPANY PROFILE

Grinnell Advisory Company was organized April 9, 2004. The Grinnell Advisory Company provides form-filing services and rate advisory services for Grinnell Mutual members.

EXECUTIVE SUMMARY

The DCI conducted a targeted market conduct examination of Grinnell Advisory Company. The examiners found the following areas of concern:

ADVISORY ORGANIZATION OPERATIONS/MANAGEMENT/GOVERNANCE

- The Company's policy and procedures on anti-trust/anti-competitive practices do not conform to NAIC best practices. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 1
- The Company filed two policy forms under GAC in error. The forms were Grinnell Mutual Reinsurance Company policy forms and not meant for use by GAC members. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organization Operations/ Management/ Governance Standard 3
- The Company failed to file with the DCI 39 circulars issued to its members pertaining to filed advisory loss costs and form filings. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organization Operations/ Management/ Governance Standard 3
- The Company advised its members in the last pages of a circular that 23 forms were discontinued, but the Company has not filed to withdraw the forms and has stated that the forms will continue to be made available to members but will never be updated with law

changes. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 8

- The Company was unable to provide a copy of two audit reports with signatures of management obtained at the time the report was submitted to management. Signature dates do not correspond to audit report dates. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 11
- Audit reports were not provided to GAC Chairman of the Board and Executive Vice President in their entirety. Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 14

FORMS DEVELOPMENT

- The Company failed to provide notification to its members of forms filed on their behalf. Reference: NAIC Market Regulation Handbook Chapter 29 – Forms Development Standard 1

EXAMINATION FINDINGS

I. ADVISORY ORGANIZATION OPERATIONS/MANAGEMENT/GOVERNANCE

The operations/management/governance portion of the examination provides a review of how the Company manages its operations.

A. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 1: The advisory organization has implemented written policies and procedures to prevent anti-competitive practices in the insurance marketplace, as related to the advisory organization’s services and communications to insurers.

To test for this standard, examiners requested and reviewed service agreements with insurers, board of directors and other committee meeting minutes, employee training materials, and policies and procedures applicable to anti-competitive practices to determine if the Company provides guidance to its staff and has adopted practices to prevent anti-competitive activity.

Finding 1: The Company’s policy and procedures on anti-trust/anti-competitive practices do not conform to NAIC Market Regulation Handbook best practices.

Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance: Standard 1

B. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 2: The advisory organization uses sound actuarial principles for the development of prospective loss costs.

To test for this standard, examiners requested and reviewed the Company's actuarial guidelines for the development of prospective loss costs and procedures to test the soundness of data prior to use for the development of prospective loss costs.

No areas of concern were noted.

C. NAIC Market Regulation Handbook Chapter 29 – Advisory Organization Operations/ Management/ Governance Standard 3: The advisory organization prepares, submits filings as necessary, adheres to applicable state filing and/or approval requirements and written procedures prior to distribution of prospective loss costs, policy forms, endorsements, factors, classifications or rating rule manuals.

To test for this standard, examiners requested and reviewed the Company's policies and procedures manual related to filings, a list of filings by SERFF tracking number, communications and manuals provided to its members, and distributed prospective loss costs, policy forms, endorsements, factors, classifications and manuals. The review is to determine if the organization was responsive to our filing analysts, if the forms and prospective loss costs distributed to subscribers match the filed forms and loss costs, and if accurate information was provided to members and subscribers relating to approval status and effective dates.

Finding 1: The Company filed two policy forms under GAC in error. The forms were Grinnell Mutual Reinsurance Company policy forms and were not meant for use by GAC members. Per member agreements and Missouri law, forms filed by GAC on behalf of its members are automatically adopted by the member insurer, unless the member gives notice to the DCI that it will not adhere to any specific submission and does so within ten calendar days after the proposed effective date of the form.

Reference: 20 CSR 500-4.100(5)(A)

Finding 2: The Company failed to file with the DCI 39 circulars issued to its members pertaining to filed advisory loss costs and form filings.

Reference: §379.321, RSMo., and 20 CSR 500-4.100(5)

D. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 8: The organization conducts ongoing research and review of state insurance laws and insurance related case law in order to be responsive to necessary changes in prospective loss costs, policy forms, endorsements, factors, classifications or manuals, as applicable.

To test for this standard, examiners requested and reviewed the Company's processes and procedures for researching insurance laws and case law and filings made to the department.

Finding 1: The Company advised its members in the last pages of a circular that 23 forms were discontinued, but the Company has not filed to withdraw the forms and has stated that the forms will continue to be made available to members but will never be updated. Consequently,

these forms may or may not continue to conform to Missouri law. If a member uses a form that is not updated, the member could be at risk of using a form that does not conform to Missouri law.

Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance: Standard 8

E. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 11: The advisory organization has an up to date, valid internal or external audit program.

To test for this standard, examiners requested and reviewed the Company’s audit plan, procedural manuals, and audit reports and results for the examination timeframe.

Finding 1: The Company was unable to provide a copy of audit reports with signatures of management obtained at the time the reports were submitted to management. Signature dates do not correspond with report dates. It is noted the Company now has a new procedure to complete a management sign off document at the conclusion of the closing meeting and will obtain electronic signatures when response findings are communicated to the audit team.

Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance: Standard 11

F. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 12: The advisory organization has appropriate controls, safeguards and procedures for protecting the integrity of computer information.

To test for this standard, examiners requested and reviewed the Company’s electronic records control and procedural manuals, and any outside contracts to determine if the Company has adequate physical security procedures related to the computer processing facilities and the network, and logical security and computer system and control procedures. Examiners also reviewed the segregation of duties between the application development, operations, and user departments to ensure information system projects are authorized, controlled and documented.

No areas of concern were noted.

G. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 13: The advisory organization has a valid disaster recovery plan.

To test for this standard, examiners requested and reviewed the organization’s disaster recovery plan, procedural manuals and controls, and outside contracts to ensure that critical business applications, databases and files are regularly backed up and stored off-site.

No areas of concerns were noted.

H. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 14: The advisory organization is adequately monitoring the activities of any entity that contractually assumes a business function or is acting on behalf of the advisory organization.

To test for this standard, examiners requested and reviewed the Company’s contracts and audit reports.

Finding 1: The Company was unable to provide evidence that the findings of the two audit reports provided during the examination were provided to the GAC Chairman and President of the Board and the Vice Presidents of the Board. While the GAC board members were present during the audit committee meetings where audit findings were discussed, the reports in their entirety were not provided. The Company is not adequately monitoring the activities of the contracted entity.

The Company advised that for future audits, the Board Chairman and Executive Vice President will be included on the distribution list found on the cover page of each audit report and the entire report will be sent to them by email.

Reference: NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance: Standard 14

I. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 15: Records are adequate, assessable, consistent and orderly and comply with state record retention requirements.

To test for this standard, examiners requested and reviewed the Company’s record retention policy to determine if it complies with Missouri record retention requirements. Examiners determined compliance with record retentions requirements based on the responses the organization provided through the examination process.

No areas of concern were noted.

J. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 16: The advisory organization is appropriately licensed.

To test for this standard, examiners requested and reviewed the Company’s certificate of authority to determine if the Company is conducting business in Missouri in accordance with the authority granted by the DCI.

No areas of concern were noted.

K. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 17: The advisory organization cooperates on a timely basis with examiners performing the examinations.

To test for this standard, examiners documented the Company’s responsiveness to requests for information during the examination.

Finding 1: The Company was late responding to one formal request.

Reference: §§379.475, 379.343, and 374.205.2(2), RSMo., and 20 CSR 100-8.040(6)

L. NAIC Market Regulation Handbook Chapter 29 – Advisory Organizations Operations/Management/Governance Standard 18: The advisory organization has developed and implemented written policies, standards and procedures for the management of insurance information.

To test this standard, examiners requested and reviewed the Company’s procedural and training manuals, audit reports, bulletins/memos regarding insurance information, and outside contracts to determine if the organization has set standards for handling, disclosing, storing and disposing of insurance information and whether it complies with state law.

No areas of concern were noted.

II. STATISTICAL PLANS

The purpose of this portion of the examination is to verify the statistical agent maintains adequate statistical plans in accordance with Missouri law, and that the data are reported in accordance with the statistical plans. It is also intended to measure a statistical agent’s compliance with statistical plan filing requirements.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company’s business.

III. CORRESPONDENCE WITH INSURERS AND STATES

The purpose of this portion of the examination is to verify the statistical agent promptly notifies the insurer and state regulators when a problem with the data is found, and then follow-up, if the insurer does not respond timely.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company’s business.

IV. DATA COLLECTION AND HANDLING

The purpose of this portion of the examination is to verify that the statistical agent adequately test reported data for validity, completeness and reasonableness.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company's business.

V. REPORTS, REPORT SYSTEMS AND OTHER DATA REQUESTS

The purpose of this portion of the examination is to review the statistical agent's reports and internal procedures for preparing reports and responding to data requests, including a review for timeliness and quality of the response.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company's business.

VI. CLASSIFICATION AND APPEAL HANDLING

The purpose of this portion of the examination is to review the Company's classification and appeal processes.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company's business.

VII. RATEMAKING FUNCTIONS

The purpose of this portion of the examination is to review the advisory organization's ratemaking, reports and reporting systems, if any, as well as the advisory organization's internal procedures for preparing related reports and responding to data requests, including the timeliness and quality of the response.

A. NAIC Market Regulation Handbook Chapter 29 – Ratemaking Functions Standard 1: The advisory organization submits filings and/or submissions to the state within the established time frame.

To test for this standard, examiners requested and reviewed advisory loss cost filings, other correspondence with the department regarding loss costs, and communications and manuals provided by the Company to its subscribers to determine: (i) compliance with Missouri statutes and regulations, (ii) timely responses to request for information in the filing, (iii) that the Company prepares and disseminates information on a timely basis, (iv) that the Company provides accurate information to its subscribers relating to the states' approval status and approved usage date of regulated materials and services (loss costs).

No areas concern were noted.

VIII. INSPECTION SERVICES

The purpose of this portion of the examination is to review the Company's processes for ensuring proper classification of risks that are subject to inspection and that the results of the inspection are provided to carriers and insureds.

After an initial review of documents provided by the Company, it was determined that this review area is not applicable to the Company's business.

IX. FORM DEVELOPMENT

The form development portion of the examination provides a review of the Company's processes for development, maintenance and filing of forms for insurance programs.

A. NAIC Market Regulation Handbook Chapter 29 – Forms Development Standard 1: The advisory organization has processes in place to identify and provide subscribers with necessary changes (by virtue of changes in state law or case law) to advisory forms.

To test for this standard, examiners requested and reviewed the Company's procedure for communications with members and subscribers of changes to forms and advisory loss costs to determine if the Company has a process and utilizes it.

Finding 1: The Company failed to provide notification to its members of six form filings filed on their behalf. While the members have access to a forms library where they can access current and past versions of forms, members may not be aware a change to a specific form was filed with the DCI without notification from the advisory organization that the change was made.

Without prompt notification prior to the effective date of the form, the member could be in violation of using an unfiled form.

Reference: §§379.321, & 379.351, RSMo.

B. NAIC Market Regulation Handbook Chapter 29 – Forms Development Standard 2: The advisory organization has quality assurance processes in place to review submissions of forms prior to filing or submitting to the applicable state.

To test for this standard, the examiners requested and reviewed the organizations procedural information for developing forms.

No areas of concern were noted.

X. CRITICISMS AND FORMAL REQUESTS TIME STUDY

This study is based upon the time required by the Company to provide the examiners with the requested material or to respond to criticisms. Missouri statutes and regulations require companies to respond to criticisms and formal requests within 10 calendar days. In the event an extension of time was requested by the Company and granted by the examiners, the response was deemed timely if it was received within the subsequent time frame. If the response was not received within the allotted time, the response was not considered timely.

A. Criticism Time Study

Number of Calendar Days to Respond	Number of Criticisms	Percentage of Total
0 to 10 days	4	80%
Over 10 days with extension	1	20%
Over 10 days without extension or after extension due date	0	0%
Totals	5	100%

The examiners found no errors in this review.

B. Formal Request Time Study

Number of Calendar Days to Respond	Number of Requests	Percentage of Total
0 to 10 days	10	67%
Over 10 days with extension	4	27%
Over 10 days without extension or after extension due date	1	6%
Totals	15	100%

Finding 1: The Company did not submit a response to one formal request within 10 days.

Reference: §374.205.2(2), RSMo, and 20 CSR 100-8.040(6)

EXAMINATION REPORT SUBMISSION

Attached hereto is the Division of Insurance Market Regulation's Final Report of the examination of Grinnell Advisory Company, Examination Number #353218. This examination was conducted by Martha Long, CIE, MCM, EIC; Julie Hesser, CIE, CPCU, MCM; Jon Meyer, CIE, and Dana Whaley, AIE. The findings in the Final Report were extracted from the Market Conduct Examiner's Draft Report, dated December 28, 2020. Any changes from the text of the Market Conduct Examiner's Draft Report reflected in this Final Report were made by the Chief Market Conduct Examiner or with the Chief Market Conduct Examiner's approval.



Stewart Freilich
Chief Market Conduct Examiner

3-3-2021

Date