STATE OF MISSOURI

DEPARTMENT OF COMMERCE & INSURANCE

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

***In Re*:**	)	
	)	
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH PA (NAIC #19445)	)	**Market Conduct Investigation No. 409408**

ORDER OF THE DIRECTOR

NOW, on this 19th day of September, 2025, Director Angela L. Nelson, after consideration and review of the Stipulation of Settlement (hereinafter "Stipulation") entered into by the Division of Insurance Market Regulation (hereinafter "Division") and National Union Fire Insurance Company of Pittsburgh PA (NAIC #19445) (hereinafter "NUFIC"), relating to the market conduct investigation no. 409408, does hereby issue the following orders:

This order, issued pursuant to §374.046.15[1] and §374.280 RSMo, is in the public interest.

IT IS THEREFORE ORDERED that the Director does hereby approve the Stipulation as agreed to by NUFIC and the Division.

IT IS FURTHER ORDERED that NUFIC shall not engage in any of the violations of statutes 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 of Missouri, shall maintain those corrective actions at all times, and shall fully comply with all terms of the Stipulation.

[1] All references, unless otherwise noted, are to Revised Statutes of Missouri 2016.

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 September, 2025.

Angela L. Nelson
Director

IN THE DEPARTMENT OF COMMERCE AND INSURANCE
STATE OF MISSOURI

***In Re*:**	)	
	)	
NATIONAL UNION FIRE INSURANCE	)	**Market Conduct Investigation No. 409408**
COMPANY OF PITTSBURGH PA	)	
(NAIC #19445)	)	

STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the "Division"), and National Union Fire Insurance Company of Pittsburgh PA (hereinafter "NUFIC"), 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, NUFIC has been granted a certificate of authority to transact the business of insurance in the State of Missouri;

WHEREAS, the Division conducted a market conduct investigation of NUFIC, investigation no. 409408; and

WHEREAS, based on the market conduct investigation of NUFIC, the Division alleges that:

1. In 1 of 10 reviewed claim files, NUFIC did not acknowledge pertinent communications and did not provide an appropriate reply within 10 working days on all communications from any claimant that reasonably suggests a response is expected, implicating the provisions of § 375.1007(2) and in violation of 20 CSR 100-1.030(1)(B), RSMo.[1]

[1] All statutory references, unless otherwise noted, are to the 2016 Revised Statutes of Missouri.

2. In 2 of the 10 reviewed claim files, NUFIC did not implement reasonable standards for the prompt investigation and settlement of claims by not advising of the acceptance or denial of the claim within 15 working days, implicating the provisions of § 375.1007(3) and in violation of 20 CSR 100-1.050(1)(A).

3. In 3 of the 10 reviewed claim files, NUFIC refused to pay claims without conducting a reasonable examination and did not provide an accurate explanation for the denial in the denial letters to the insured, implicating the provisions of §§ 375.1007(6) and 375.1007(12).

4. In 3 of the 10 reviewed claim files, NUFIC did not maintain claim records in a manner to clearly show the inception, handling and disposition of the claim files, violating the provisions of § 374.205.2(2) and 20 CSR 100-8.040(3)(B).

5. In 1 of the 10 reviewed claim files, NUFIC did not implement reasonable standards for the prompt investigation and settlement of claims and did not give reasons more time was needed for acceptance or denial of the claim, implicating the provisions of § 375.1007(3) and in violation of 20 CSR 100-1.050(1)(C).

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.** NUFIC agrees to take remedial action bringing it into compliance with the statutes and regulations of Missouri and agrees to maintain those remedial actions at all times. Such remedial actions shall include the following:

1. NUFIC agrees to comply with applicable Missouri statutory and regulatory claims requirements, including but not limited to §§ 375.1007(2), 375.1007(3), 375.1007(6),

375.1007(12), 20 CSR 100-1.030(1)(B), 20 CSR 100-1.050(1)(A), 20 CSR 100-1.050(1)(C), 20 CSR 100-8.040(3)(B), and any provisions specifically identified in the findings of this Stipulation as having been violated or implicated. In addition, NUFIC agrees to ensure that any third-party entity adjudicating claims on behalf of NUFIC will also be in compliance with these laws.

2. For a period of one year after the date of the Order approving this Stipulation, NUFIC agrees to conduct semi-annual audits of at least 50 random claim files closed during each audit period for each third-party entity adjudicating Missouri travel insurance claims for compliance with Missouri law, including but not limited to §§ 375.1007(2), 375.1007(3), 375.1007(6), 375.1007(12), 20 CSR 100-1.030(1)(B), 20 CSR 100-1.050(1)(A), 20 CSR 100-1.050(1)(C), and 20 CSR 100-8.040(3)(B). The first audit period will begin on the date of the Order adopting this Stipulation and continue for six months. The second audit period will begin the day after the previous audit period ended and continue for six months. NUFIC further agrees to reprocess any claims identified in the audits that do not comply with Missouri law or meet the requirements of the remedial actions, together with payment of interest pursuant to § 374.191. NUFIC shall report the results of each audit including reprocessed claims along with supporting evidence as requested by the examiners within 60 days of the end of the audit period.

C. **Compliance.** NUFIC agrees to file documentation pursuant to § 374.190 with the Division, in a format acceptable to the Division, of any remedial action taken to implement compliance with the terms of this Stipulation. NUFIC agrees to provide such documentation within thirty (30) days of the entry of the Order approving this Stipulation unless otherwise specified in Section B above.

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

E. **Waivers.** NUFIC, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights to 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 market conduct investigation no. 409408.

F. **Amendments.** No amendments to this Stipulation shall be effective unless made in writing and agreed to by authorized representatives of the Division and NUFIC.

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

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

I. **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 by facsimile or by electronically transmitted signature shall be fully and legally effective and binding.

J. **Effect of Stipulation.** This Stipulation shall not become effective until entry of an Order by the Director (hereinafter, "Director") approving this Stipulation.

K. **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: September 15, 2025

Teresa Kroll
Chief Market Conduct Examiner
Division of Insurance Market Regulation

DATED: August 27, 2025

Name: Steven R. Harris
Title: Vice President
National Union Fire Insurance Company
of Pittsburgh PA