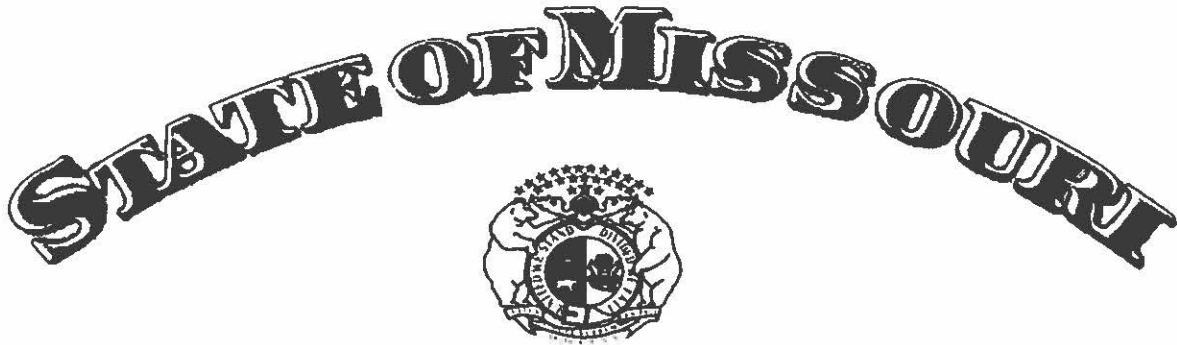




DEPARTMENT OF COMMERCE & INSURANCE

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

INSURANCE BULLETIN 26-12

Religious Mutual Aid Arrangements for Damage to Real Property

Issued: October 7, 2026

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Interested Parties and Stakeholders

From: Angela L. Nelson, Director

A handwritten signature in blue ink, appearing to read 'Angela L. Nelson', is placed over the printed name of the Director.

Re: Religious mutual aid arrangements for certain real property

The Department recognizes that certain religious communities have longstanding practices whereby members conscientiously object to participating in insurance arrangements and instead provide mutual financial assistance to one another following property loss.

The Department considers a qualifying religious mutual aid arrangement to be one established and maintained by a bona fide religious sect, division, congregation,

association, society, or affiliated organization that has been in continuous existence at all times since December 31, 1950, and whose participating members:

1. are conscientiously opposed, based upon established religious tenets or teachings, to accept the benefits of public or private insurance;
2. belong to a religious community with an established practice, which it has maintained for a substantial and continuous period, of providing assistance to its members in times of need; and
3. participate in the arrangement as part of the religious beliefs, practices, and mutual-assistance traditions of the community.

The Department will not consider a qualifying religious mutual aid arrangement to be engaging in the business of insurance solely because the organization receives contributions, assessments, dues, or other amounts from participating members and uses those funds to provide mutual financial assistance following physical damage to or destruction of qualifying property, provided that:

1. participation is limited to qualifying members of the religious community;
2. the arrangement is operated for religious mutual assistance and not for commercial profit;
3. the arrangement is not offered or marketed to the general public; and
4. the organization does not represent itself as an insurance company or represent the arrangement as insurance.

No application, approval, registration, notice, or filing with the Department is required for an arrangement meeting the conditions of this Bulletin.

The Department will not pursue licensing, administrative, or other regulatory enforcement action under the Missouri insurance laws against a religious society, association, congregation, or affiliated organization solely for establishing, administering, or participating in a qualifying religious mutual aid arrangement meeting the conditions set forth in this Bulletin.

This Bulletin applies only to arrangements providing mutual financial assistance following direct physical damage to or destruction of structures owned by an individual participating member caused by any peril, including, but not limited to, fire, wind, or flood. Qualifying structures may include residential homes, barns, agricultural buildings, shops, workshops, garages, storage buildings, customary outbuildings, and commercial structures used in a trade, occupation, farming operation, craft, or business conducted by the individual owner.

The regulatory safe harbor extended through this Bulletin is limited to mutual financial assistance for direct physical damage to or destruction of the qualifying structures described above. It does not apply to any other arrangements purporting to cover or indemnify losses typically associated with automobile, liability, professional liability, health, disability, life, annuity, surety, fidelity, or any other type of insurance coverage unrelated to real property. This exclusion does not limit or affect section 303.220 RSMo, under which a religious denomination that discourages its members from purchasing insurance as being contrary to its religious tenets may self-insure its members' motor vehicles through the Missouri Department of Revenue.

The Department reserves the right to review and investigate any arrangement that is marketed to the general public, materially misrepresents its nature, provides benefits outside the scope of this Bulletin, is operated principally as a commercial enterprise, or involves fraud or material misrepresentation.

This Bulletin will remain in effect until otherwise rescinded.

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