

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Filing at a Glance

Company: NCCI
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
State: Missouri
TOI: 16.0 Workers Compensation
Sub-TOI: 16.0004 Standard WC
Filing Type: Rule
Date Submitted: 01/21/2013
SERFF Tr Num: NCCI-128859616
SERFF Status: Closed-APPROVED
State Tr Num:
State Status:
Co Tr Num: 01-MO-2013 (LB)
Effective Date: 08/01/2013
Requested (New):
Effective Date: 08/01/2013
Requested (Renewal):
Author(s): Lesley O'Brien, Alison Herwig, Frank Gnolfo, Roy Wood, Dennis Kokulak, Robert Dalton, Michelle Baker
Reviewer(s): Jon Meyer (PC) (primary)
Disposition Date: 07/19/2013
Disposition Status: APPROVED
Effective Date (New): 08/01/2013
Effective Date (Renewal): 08/01/2013
State Filing Description:

State: Missouri
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

General Information

Project Name: Status of Filing in Domicile:
 Project Number: Domicile Status Comments:
 Reference Organization: Reference Number:
 Reference Title: Advisory Org. Circular:
 Filing Status Changed: 07/19/2013
 State Status Changed: 07/03/2013 Deemer Date:
 Created By: Frank Gnolfo Submitted By: Frank Gnolfo
 Corresponding Filing Tracking Number:
 State TOI: 16.0 Workers Compensation State Sub-TOI: 16.0004 Standard WC

Filing Description:

This item changes NCCI's Basic Manual for Workers Compensation and Employers Liability Insurance (Basic Manual) as follows:

- Implements national Rule 3-C-3-a for use in Missouri
- Removes the Missouri state rule exception to Rule 3-C-3-a

In addition, this item changes NCCI's Retrospective Rating Plan Manual for Workers Compensation and Employers Liability Insurance (Retrospective Rating Plan Manual) as follows:

- Implements national Rule 1-B-1-f for use in Missouri
- Removes the Missouri state rule exception to Rule 1-B-1-f

Company and Contact

Filing Contact Information

Roy Wood, State Relations Executive roy_wood@ncci.com
 11430 Gravois Road 314-843-4001 [Phone]
 Suite 310 314-842-3188 [FAX]
 St. Louis, MO 63126

Filing Company Information

NCCI	CoCode:	State of Domicile: Florida
901 Peninsula Corporate Circle	Group Code:	Company Type:
Boca Raton, FL 33487	Group Name:	State ID Number:
(561) 893-3186 ext. [Phone]	FEIN Number: 65-0439698	

Filing Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State Specific

NAIC Number: RO99985

Have you reviewed the General Instructions document? (yes/no)(General Instructions updated 9/14/07): Yes

If this is a rate filing, was rate data added on the rate/rule schedule? (yes/no): No

State: Missouri

Filing Company: NCCI

TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC

Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F

Project Name/Number: /

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
APPROVED	Jon Meyer (PC)	07/19/2013	07/19/2013

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
PENDING INDUSTRY RESPONSE	Jon Meyer (PC)	07/19/2013	07/19/2013
PENDING INDUSTRY RESPONSE	Jon Meyer (PC)	07/18/2013	07/18/2013
PENDING INDUSTRY RESPONSE	Jon Meyer (PC)	07/17/2013	07/17/2013
PENDING INDUSTRY RESPONSE	Karen Rimel	07/03/2013	07/03/2013

Response Letters

Responded By	Created On	Date Submitted
Frank Gnolfo	07/19/2013	07/19/2013
Frank Gnolfo	07/19/2013	07/19/2013
Frank Gnolfo	07/18/2013	07/18/2013
Michelle Baker	07/17/2013	07/17/2013

SERFF Tracking #:

NCCI-128859616

State Tracking #:**Company Tracking #:**

01-MO-2013 (LB)

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Disposition

Disposition Date: 07/19/2013

Effective Date (New): 08/01/2013

Effective Date (Renewal): 08/01/2013

Status: APPROVED

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Filing Memorandum	APPROVED	Yes
Supporting Document	Response to Objection of 7/3/13	APPROVED	Yes
Rate	Exhibit 1	WITHDRAWN	Yes
Rate	Exhibit 2	WITHDRAWN	Yes
Rate	Exhibit 3	APPROVED	Yes
Rate	Exhibit 4	APPROVED	Yes

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Objection Letter

Objection Letter Status	PENDING INDUSTRY RESPONSE
Objection Letter Date	07/19/2013
Submitted Date	07/19/2013
Respond By Date	07/26/2013

Dear Roy Wood,

Introduction:

Thank you for your response to our previous inquiry. Upon review of the information provided, the following concerns remain:

Objection 1

Comments: You have requested the effective date be amended to be on Approval. The filing is ready to close so we ask that a Post Submission Update be submitted to create an actual effective date in order for this filing to be searchable by effective date.

Conclusion:

Please respond to the above concerns within one week, or let me know by then if more time is necessary. Thank you.

Sincerely,

Jon Meyer (PC)

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Objection Letter

Objection Letter Status	PENDING INDUSTRY RESPONSE
Objection Letter Date	07/18/2013
Submitted Date	07/18/2013
Respond By Date	07/25/2013

Dear Roy Wood,

Introduction:

Thank you for your response to our previous inquiry. Upon review of the information provided, the following concerns remain:

Objection 1

- Exhibit 3, Rule 1 (Rate)
- Exhibit 4, Rule 1 (Rate)

Comments: Per the phone discussion with Roy Wood on 7/18/13, please confirm that no Missouri individual insureds will have any impact due to the removal of the outdated Missouri exception to Rule 1B1F of the Retrospective Rating Plan Manual and that the filing is only intended to clean up a rule that has not been in use for several years. If this is incorrect, please clarify.

Conclusion:

Please respond to the above concerns within one week, or let me know by then if more time is necessary. Thank you.

Sincerely,

Jon Meyer (PC)

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Objection Letter

Objection Letter Status	PENDING INDUSTRY RESPONSE
Objection Letter Date	07/17/2013
Submitted Date	07/17/2013
Respond By Date	07/24/2013

Dear Roy Wood,

Introduction:

Thank you for your response to our previous inquiry. Upon review of the information provided, the following concerns remain:

Objection 1

- Response to Objection of 7/3/13 (Supporting Document)

Comments: For clarification, are you requesting the entire filing be withdrawn or just the one section?

Conclusion:

Please respond to the above concerns within one week, or let me know by then if more time is necessary. Thank you.

Sincerely,

Jon Meyer (PC)

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Objection Letter

Objection Letter Status	PENDING INDUSTRY RESPONSE
Objection Letter Date	07/03/2013
Submitted Date	07/03/2013
Respond By Date	07/17/2013

Dear Roy Wood,

Introduction:

Objection 1

Comments: Per a meeting with Angie Nelson, Joan Dutil, and Roy Wood, we request that this filing be withdrawn.

Conclusion:

Please respond to this letter by the above date. This submission will be held in suspense pending your response. Feel free to contact me at 573.751.1945 should you have any questions or concerns.

Sincerely,

Karen Rimel

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/19/2013
Submitted Date	07/19/2013

Dear Jon Meyer (PC),

Introduction:

Hello

Response 1

Comments:

Will submit pos submission update for an effective date of 8/1/13

Related Objection 1

Comments: You have requested the effective date be amended to be on Approval. The filing is ready to close so we ask that a Post Submission Update be submitted to create an actual effective date in order for this filing to be searchable by effective date.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thanks

Sincerely,

Frank Gnolfo

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/19/2013
Submitted Date	07/19/2013

Dear Jon Meyer (PC),

Introduction:

Hello

Response 1

Comments:

"This is to confirm that no Missouri individual insureds will have any impact due to the removal of the outdated Missouri exception to Rule 1B1F of the Retrospective Rating Plan Manual."

Related Objection 1

Applies To:

- Exhibit 3, Rule 1 (Rate)
- Exhibit 4, Rule 1 (Rate)

Comments: Per the phone discussion with Roy Wood on 7/18/13, please confirm that no Missouri individual insureds will have any impact due to the removal of the outdated Missouri exception to Rule 1B1F of the Retrospective Rating Plan Manual and that the filing is only intended to clean up a rule that has not been in use for several years. If this is incorrect, please clarify.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you.

Sincerely,

Frank Gnolfo

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/18/2013
Submitted Date	07/18/2013

Dear Jon Meyer (PC),

Introduction:

Hello

Response 1

Comments:

We are withdrawing Exhibits 1 and 2. We request approval of Exhibits 3 and 4 with a revised effective date to be upon approval.

Related Objection 1

Applies To:

- Response to Objection of 7/3/13 (Supporting Document)

Comments: For clarification, are you requesting the entire filing be withdrawn or just the one section?

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thanks!

Sincerely,

Frank Gnolfo

SERFF Tracking #:

NCCI-128859616

State Tracking #:

Company Tracking #:

01-MO-2013 (LB)

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 07/17/2013
Submitted Date 07/17/2013

Dear Jon Meyer (PC),

Introduction:

Hello,

Response 1

Comments:

Response to objection is in supporting documentation tab.

Related Objection 1

Comments: Per a meeting with Angie Nelson, Joan Dutil, and Roy Wood, we request that this filing be withdrawn.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to Objection of 7/3/13
Comments:	
Attachment(s):	01 MO 2013 Interrog Response.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you!

Sincerely,

Michelle Baker

State: Missouri **Filing Company:** NCCI
TOI/Sub-TOI: 16.0 Workers Compensation/16.0004 Standard WC
Product Name: 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F
Project Name/Number: /

Post Submission Update Request Processed On 07/19/2013

Status: Allowed
Created By: Frank Gnolfo
Processed By: Jon Meyer (PC)
Comments:

General Information:

Field Name	Requested Change	Prior Value
Effective Date Requested (New)	08/01/2013	03/01/2013
Effective Date Requested (Renew)	08/01/2013	03/01/2013

SERFF Tracking #:

NCCI-128859616

State Tracking #:**Company Tracking #:**

01-MO-2013 (LB)

State: Missouri **Filing Company:** NCCI**TOI/Sub-TOI:** 16.0 Workers Compensation/16.0004 Standard WC**Product Name:** 01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F**Project Name/Number:** /

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	WITHDRAWN 07/19/2013	Exhibit 1	Rule 3	Replacement	B-1369	01-MO-2013 Exh 1.pdf
2	WITHDRAWN 07/19/2013	Exhibit 2	Rule 3	Withdrawn	B-1369	01-MO-2013 Exh 2.pdf
3	APPROVED 07/19/2013	Exhibit 3	Rule 1	Replacement	B-1225 and E-1090	01-MO-2013 Exh 3.pdf
4	APPROVED 07/19/2013	Exhibit 4	Rule 1	Withdrawn	B-1225 and E-1090	01-MO-2013 Exh 4.pdf

**ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND
NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F**

**EXHIBIT 1
BASIC MANUAL—2001 EDITION
RULE 3—RATING DEFINITIONS AND APPLICATION OF PREMIUM ELEMENTS
C. DOMESTIC WORKERS—RESIDENCES
(National Rule to be Applicable in Missouri)**

3. Coverages

a. Workers Compensation and Employers Liability Insurance

Statutory workers compensation obligations of an employer with regard to domestic workers may be insured as follows:

- By the Standard Policy, or
- By attaching the Standard Workers Compensation and Employers Liability Coverage for Residence Employees Endorsement (WC 00 03 14) to a homeowners policy, a comprehensive personal liability policy, or to any policy that provides similar coverage

Statutory coverage is the minimum extent of insurance protection required in an insurance contract in accordance with applicable state laws or statutes.

**ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND
NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F**

**EXHIBIT 2
BASIC MANUAL—2001 EDITION
MISSOURI STATE RULE EXCEPTIONS
RULE 3—RATING DEFINITIONS AND APPLICATION OF PREMIUM ELEMENTS
C. DOMESTIC WORKERS—RESIDENCES**

3. ~~Coverages~~

a. ~~Workers Compensation and Employers Liability Insurance~~

~~Change Rule 3-C-3-a as follows:-~~

~~Statutory workers compensation obligations of an employer with regard to domestic workers must be insured by the Standard Policy. To do so, attach the Standard Workers Compensation and Employers Liability Coverage for Residence Employees Endorsement (WC-00-03-14) to the Standard Policy.~~

~~Statutory coverage is the minimum extent of insurance protection required in an insurance contract in accordance with applicable state laws or statutes.~~

**ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND
NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F**

**EXHIBIT 3
RETROSPECTIVE RATING PLAN MANUAL—2009 EDITION
RULE 1—GENERAL EXPLANATION
B. DEFINITIONS
1. GENERAL DEFINITIONS
(National Rule to be Applicable in Missouri)**

f. Standard Premium (SP)

For purposes of the retrospective rating plan, standard premium is determined on the basis of authorized rates, any experience rating modification, and minimum premiums. Determination of standard premium excludes:

- (1) Premium discount
- (2) Expense constant
- (3) Premium resulting from the nonratable element codes
- (4) Premium developed by the passenger seat surcharge under Classification Code 7421
- (5) Premium developed by the occupational disease rates for employers subject to the Federal Coal Mine Safety and Health Act
- (6) Premium developed by the catastrophe provisions as outlined in NCCI's *Basic Manual*

**ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND
NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F**

**EXHIBIT 4
RETROSPECTIVE RATING PLAN MANUAL—2009 EDITION
MISSOURI STATE RULE EXCEPTIONS
RULE 1—GENERAL EXPLANATION
B. DEFINITIONS
1. GENERAL DEFINITIONS**

f. ~~Standard Premium (SP)~~

~~Change Rule 1 B 1 f as follows:~~

~~Premium resulting from the nonratable catastrophe element in the manual rates for classifications other than Codes 7405 and 7431 listed in the *Experience Rating Plan Manual*. The nonratable catastrophe element for Codes 7405 and 7431 is 25%.~~

SERFF Tracking #:

NCCI-128859616

State Tracking #:**Company Tracking #:**

01-MO-2013 (LB)

State:

Missouri

Filing Company:

NCCI

TOI/Sub-TOI:

16.0 Workers Compensation/16.0004 Standard WC

Product Name:

01-MO-2013 Implementation of National Basic Manual Rule 3-C-3-A and National Retrospective Rating Plan Manual Rule 1-B-1-F

Project Name/Number:

/

Supporting Document Schedules

Satisfied - Item:	Filing Memorandum
Comments:	
Attachment(s):	01-MO-2013 Memorandum.pdf
Item Status:	APPROVED
Status Date:	07/19/2013

Satisfied - Item:	Response to Objection of 7/3/13
Comments:	
Attachment(s):	01 MO 2013 Interrog Response.pdf
Item Status:	APPROVED
Status Date:	07/19/2013

FILING MEMORANDUM

ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F

PURPOSE

This item changes NCCI's *Basic Manual for Workers Compensation and Employers Liability Insurance (Basic Manual)* as follows:

- Implements national Rule 3-C-3-a for use in Missouri
- Removes the Missouri state rule exception to Rule 3-C-3-a

In addition, this item changes NCCI's *Retrospective Rating Plan Manual for Workers Compensation and Employers Liability Insurance (Retrospective Rating Plan Manual)* as follows:

- Implements national Rule 1-B-1-f for use in Missouri
- Removes the Missouri state rule exception to Rule 1-B-1-f

BACKGROUND

Basic Manual Rule 3-C-3-a

The Missouri state rule exception to Rule 3-C-3-a in NCCI's *Basic Manual* states that the statutory workers compensation obligations of an employer with regard to domestic workers must be insured by the Standard Policy.

During a review of Rule 3-C-3 of the *Basic Manual*, NCCI identified that the Missouri exception to Rule 3-C-3-a is unnecessary. According to Missouri Statute §287.090, the employment of domestic workers is exempt from the workers compensation law. However, an employer of domestic workers may elect coverage for these workers by purchasing and accepting a valid workers compensation insurance policy or endorsement.

National *Basic Manual* Rule 3-C-3-a, which is consistent with Missouri Statute §287.090, provides that the statutory workers compensation obligations of an employer with regard to domestic workers may be insured as follows:

- Obtaining a Workers Compensation and Employers Liability Insurance Policy, or
- Attaching the Workers Compensation and Employers Liability Coverage for Residence Employees Endorsement to a homeowners policy, a comprehensive personal liability policy, or to any policy that provides similar coverage

Retrospective Rating Plan Manual Rule 1-B-1-f

National Rule 1-B-1-f in NCCI's *Retrospective Rating Plan Manual* lists the premium elements that are excluded from the determination of standard premium for purposes of the retrospective rating plan. As provided in this rule, premium resulting from the nonratable element codes is excluded from the determination of standard premium.

The Missouri state rule exception to Rule 1-B-1-f states that the determination of standard premium excludes "premium resulting from the nonratable catastrophe element in the manual rates for classifications other than

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FILING MEMORANDUM

ITEM 01-MO-2013—IMPLEMENTATION OF NATIONAL BASIC MANUAL RULE 3-C-3-A AND NATIONAL RETROSPECTIVE RATING PLAN MANUAL RULE 1-B-1-F

Codes 7405 and 7431 listed in the *Experience Rating Plan Manual*.” The Missouri state rule exception further states, “The nonratable catastrophe element for Codes 7405 and 7431 is 25%.”

NCCI has identified that the Missouri state rule exception to Rule 1-B-1-f is no longer necessary for the following reasons:

- NCCI’s *Experience Rating Plan Manual* no longer lists the nonratable catastrophe elements. The nonratable element codes and associated loss cost values and rates are currently provided in NCCI’s *Basic Manual*.
- The nonratable catastrophe element for Codes 7405 and 7431 is currently 35% as incorporated into the Missouri loss cost values and rates, published in NCCI’s *Basic Manual*.
- The nonratable catastrophe element for Codes 7405 and 7431 should be excluded from the determination of standard premium for purposes of the retrospective rating plan in Missouri, which is consistent with the treatment of this premium element in other states.

PROPOSAL

The following changes are proposed for Missouri:

1. Adopt national *Basic Manual* Rule 3-C-3-a
2. Discontinue *Basic Manual* state rule exception to Rule 3-C-3-a
3. Adopt national *Retrospective Rating Plan Manual* Rule 1-B-1-f
4. Discontinue *Retrospective Rating Plan Manual* state rule exception to Rule 1-B-1-f

IMPACT

There will be no premium impact as a result of this item.

EXHIBIT COMMENTS AND IMPLEMENTATION SUMMARY

Exhibit	Exhibit Comments	Implementation Summary
1	Adds national Rule 3-C-3-a in NCCI’s <i>Basic Manual</i> for use in Missouri	To be effective 12:01 a.m. on March 1, 2013, applicable to new and renewal policies
2	Removes the Missouri state rule exception to Rule 3-C-3-a in NCCI’s <i>Basic Manual</i>	
3	Adds national Rule 1-B-1-f in NCCI’s <i>Retrospective Rating Plan Manual</i> for use in Missouri	
4	Removes the Missouri state rule exception to Rule 1-B-1-f in NCCI’s <i>Retrospective Rating Plan Manual</i>	

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**National Council on
Compensation Insurance**

Roy O. Wood
State Relations Executive
Regulatory Services Division
314-843-4001
roy_wood@ncci.com

July 17, 2013

Ms. Karen Rimel
Missouri Department of Insurance
PO Box 690
Jefferson City, MO 65102-0690

RE: Item 01-MO-2013—Implementation of National Basic Manual Rule 3-C-3-a and National Retrospective Rating Plan Manual Rule 1-B-1-f
SERFF Tracking #: NCCI-128859616

Thank you for your July 3, 2013 comment regarding the above-referenced item filing. After review and consideration, we offer the following response to your question.

Question 1:

Per a meeting with Angie Nelson, Joan Dutil, and Roy Wood, we request that this filing be withdrawn.

Response 1:

NCCI respectfully requests that you reconsider your request to withdraw Item 01-MO-2013 and consider approval of only Exhibits 3 and 4 of the item, which revise NCCI's ***Retrospective Rating Plan Manual***.

It is necessary to revise the current Missouri state rule exception to Rule 1-B-1-f to address the following matters:

- NCCI's ***Experience Rating Plan Manual*** no longer lists the nonratable catastrophe elements. The nonratable element codes and associated loss cost values and rates are currently provided in NCCI's ***Basic Manual***.
- The nonratable catastrophe element for Codes 7405 and 7431 is currently 35% as incorporated into the Missouri advisory loss cost values and assigned risk rates, published in NCCI's ***Basic Manual***.
- The nonratable catastrophe element for Codes 7405 and 7431 should be excluded from the determination of standard premium for purposes of the retrospective rating plan in Missouri, which is consistent with the treatment of this premium element in other states.

Thank you for your consideration of this item.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy O. Wood". The signature is fluid and cursive, with a prominent loop at the beginning and a long, sweeping tail.

Roy O. Wood
State Relations Executive