



DEPARTMENT OF COMMERCE & INSURANCE

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

INSURANCE BULLETIN 24-05

Application of 20 CSR 500-1.100 (3) Standard Fire Policies

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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)¹.

To: All insurers licensed to do business in the State of Missouri (“Insurers”)

From: Chlora Lindley-Myers, Director

Re: Application of 20 CSR 500-1.100 (3) Standard Fire Policies

This bulletin is issued by the Missouri Department of Commerce and Insurance to assist Insurers in implementing the notice provisions contained in 20 CSR 500-1.100 (3). The purpose of these provisions is to provide timely notice to policyholders whose homeowners coverage is cancelled, non-renewed, reduced in amount or adversely modified and to ensure that the policyholder has access to information which will allow them to obtain replacement coverage either through the private insurance market or through the Missouri Property Insurance Placement Facility, also known as the Missouri FAIR Plan.

A number of questions have arisen from Insurers regarding the application of 20 CSR 500-1.100 (3). These questions are addressed below.

¹ All statutory references herein are to RSMo (2016) unless otherwise noted.

When is a producer's name required to be included on notices to policyholders?

Where an insurance producer was utilized in the initial sale of the policy and continues to service the policy or receive commissions on renewals, the producer's name or the name of the agency for which the producer works should be included on notices of cancellation, non-renewal, reduction in amount or adverse modification. If 1) the policy is no longer serviced by a producer at the time of cancellation, non-renewal, reduction in amount or adverse determination; 2) a producer is no longer receiving commissions on renewals at the time of cancellation, non-renewal, reduction in amount or adverse determination; or 3) the producer (if employed or affiliated with the insurer at the time of sale) is no longer employed or affiliated with the insurer at the time of cancellation, non-renewal, reduction in amount or adverse determination, the notice need not include the name of a producer as long as the notice includes a contact phone number for the insurer that the policyholder can call to obtain information on locating a producer who can assist the policyholder in obtaining replacement coverage.

What address can be utilized when the producer of record is outside of Missouri?

When the producer of record is located outside of Missouri (but licensed in Missouri), the notice may either include a Missouri address for the insurer or no address as long as a current phone number for the producer is included in the notice.

What address can be utilized when the producer works from home?

When the producer of record works from home, the notice may include either a Missouri address for the insurer or no address as long as a current phone number for the producer is included in the notice.

What address can be utilized when the producer works from multiple locations?

When the producer of record works from multiple locations, the notice may include a designated primary location for the producer, a Missouri address for the insurer or no address as long as a current phone number for the producer is included in the notice.

General questions relating to address and phone number.

Recognizing the difficulties an insurer may have in verifying a current address for the producer or in programming its systems to include a producer address, insurers may, as an alternative to listing the producer's address on the notice, include a Missouri address for the insurer as long as a current phone number for the producer is included in the notice. In the event that the insurer does not possess a current phone number for the producer, it may include a contact phone number for the insurer that the policyholder can call to obtain information on locating a producer who can assist the policyholder in obtaining replacement coverage.

Further questions relating to 20 CSR 500-1.100 (3).

If an insurer has further questions relating to the application or 20 CSR 500-1.100 (3), it may contact the Department's Insurance Market Conduct Section at marketconduct@insurance.mo.gov and/or request the issuance of a no-action letter pursuant to §374.018 RSMo.

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