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November 20, 2025

Via Email

Joe A. LeDuc
Director, Insurance Market Regulation Division
Missouri Department of Commerce & Insurance
Jo.LeDuc@insurance.mo.gov

Dear Director Le Duc:

Re: Bulletin 15-02 No-Action Letter Request on behalf of Travelers Casualty & Surety Company, The Standard Fire Insurance Company, The Travelers Indemnity Company of Connecticut, Farmington Casualty Company, The Travelers Indemnity Company of America, Travelers Property Casualty Company of America, The Travelers Indemnity Company, The Phoenix Insurance Company, The Charter Oak Fire Insurance Company, Travelers Casualty Insurance Company of America, Travelers Casualty Company of Connecticut, Travelers Commercial Casualty Company

I am writing on behalf of the above captioned property and casualty insurance carriers operating in Missouri ("Travelers"), to respectfully request a "No-Action Letter" pursuant to Rs. Mo. §374.018. This request pertains to Bulletin 15-02, which addresses Workers Compensation individually rated Large Deductible policies.

Travelers respectfully requests the Department's discretion to waive any enforcement actions that may arise from the guidance outlined in Bulletin 15-02, to afford Travelers the flexibility to write single-state large deductible Workers Compensation and Employers Liability policies without requiring multi-state exposure, starting in 2026. We believe this flexibility will be advantageous for Missouri employers, especially hospitals and contractors, while also supporting the state's insurance market, by permitting efficient management of large healthcare facilities and construction projects, enhancing consumer protection, and promoting economic growth.

Wrap-up programs, known as Owner-Controlled Insurance Programs (OCIPs) or Contractor-Controlled Insurance Programs (CCIPs), consolidate insurance coverage for all parties involved in large construction projects, offering significant benefits and potential cost savings. However, Bulletin 15-02's multi-state eligibility requirement restricts these benefits for Missouri-only operations. Due to the unique nature of wrap-up programs, Missouri employers and contractors working on these large construction projects can operate solely within Missouri, with minimal or no multistate exposure.

Missouri law permits carriers to write large deductible plan workers compensation policies (Rs. Mo. §§375-1605(6); 287-310). The guidance in Bulletin 15-02 restricts these policies to employers operating in multiple states, a requirement not mandated by Missouri statute or NCCI Basic Manual Rules. This poses a challenge for carriers writing hospitals and wrap-up insurance programs for Missouri-only risks, preventing larger risks and project sponsors from accessing large deductible plans.

In June 2024, we engaged in discussions with the Department regarding the potential for property and casualty insurance carriers to write wrap-up insurance programs in Missouri. Subsequently, in our August 2024 correspondence, we outlined the advantages of single-risk construction wrap-up programs. In April 2025, the Department recommended that pursuing a No-Action Letter would be the most appropriate course of action to address this matter and ensure that no enforcement action would be pursued.

We understand that the granting of this No-Action Letter would not change Travelers compliance with applicable Missouri statutory requirements (**Rs. Mo. §§ 287.690, 287.715, 287.715.6, 287.716, 287.310, 148.320**), including calculating and remitting state premium taxes and workers-compensation specific taxes and assessments.

Please find attached exhibits supporting this request, including Travelers Workers Compensation and Employers Liability Large Risk Deductible plan rule filing (2022) and sample individual risk large deductible policy form filing.

Please issue a No Action Letter to allow the above underwriting companies to sell, quote and issue single-state individually rated Large Deductible Workers Compensation and Employers liability insurance policies notwithstanding the multi-operation guidance under Bulletin 15-02. We appreciate your review and look forward to your decision.

Should you have any questions, or need additional information, please do not hesitate to contact me at rbeaudo3@travelers.com or (860) 277-9735.

Thank you for your attention to this matter.

Sincerely,

Robert Beaudoin
AVP, Snr. Actuarial & Analytics
Travelers Indemnity Company

Encl.

Cc:

Angie L. Nelson

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