



DEPARTMENT OF COMMERCE & INSURANCE

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

In Re:

**METROPOLITAN LIFE
INSURANCE COMPANY
(NAIC #65978)**

Market Conduct Investigation No. 417115

ORDER OF THE DIRECTOR

NOW, on this 9th day of July, 2026, 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 Metropolitan Life Insurance Company (NAIC #65978) (hereinafter "MetLife"), relating to the market conduct investigation no. 417115, does hereby issue the following orders:

This order, issued pursuant to §374.046.15¹ 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 MetLife and the Division.

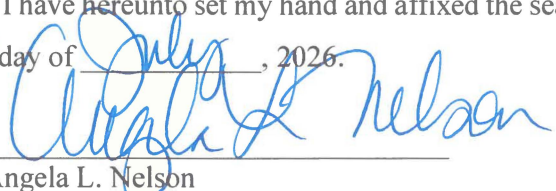
IT IS FURTHER ORDERED that MetLife shall not engage in any of the violations of statutes and regulations set forth in the Stipulation, shall implement procedures to place it in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri, shall maintain 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 9th day of July, 2026.





Angela L. Nelson
Director

**IN THE DEPARTMENT OF COMMERCE AND INSURANCE
STATE OF MISSOURI**

In Re:

**METROPOLITAN LIFE INSURANCE
COMPANY (NAIC #65978)**

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Market Conduct Investigation No. 417115

STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”), and Metropolitan Life Insurance Company (hereinafter “MetLife”), 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, MetLife 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 MetLife, investigation no. 417115; and

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

1. MetLife did not file an annual report of its utilization review program activities in 2021, 2022, 2023, or 2024, in violation of §376.1359.2,¹ §376.1369 and 20 CSR 400-10.020.

2. MetLife utilized an unlicensed entity to perform the duties of a Utilization Review Agent, materially aiding in the violation of §374.503.1.

WHEREAS, the Division and MetLife have agreed to resolve the issues raised in the market

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

conduct investigation as follows:

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.** MetLife 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. MetLife agrees to file an annual report of utilization review activities and certification of compliance for 2021, 2022, 2023, 2024, and 2025 within 60 days of the date of the Order approving this Stipulation. The filing should state that it is being submitted as part of a settlement of Missouri Market Conduct Investigation number 417115.

2. MetLife agrees that going forward it will timely file an annual report of utilization review activities and certification of compliance whenever it conducts utilization review or employs another entity to conduct utilization review on its behalf.

3. MetLife agrees not to utilize unlicensed entities to perform utilization review on its behalf.

C. **Compliance.** MetLife agrees to file documentation pursuant to § 374.190 with the Division of any remedial action taken to implement compliance with the terms of this Stipulation. The documentation shall be in a format acceptable to the Division, and be filed within 60 days of the entry of an Order approving this Stipulation, unless a different timeframe is specified in Section B.

D. **Non-Admission.** Nothing in this Stipulation shall be construed as an admission by MetLife, 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.** MetLife, 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. 417115.

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

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 MetLife, respectively.

I. **Counterparts and Electronic Signature.** 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 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: July 6, 2026



Teresa Kroll
Chief Market Conduct Examiner
Division of Insurance Market Regulation

DATED: 6/30/2026



Name: Crystal McElroy

Title: VP Group Benefits Contracts & Compliance
Metropolitan Life Insurance Company