



BOSTON MUTUAL LIFE INSURANCE COMPANY

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INSURANCE DEPARTMENT
STATE OF CONNECTICUT

2017 AUG 28 A 8:06

FAMILY MATTERS. NO MATTER WHAT.

Grant David Ward
2nd Vice President, Chief Compliance Officer
& Counsel

August 22, 2017

The Honorable Katherine L. Wade
Commissioner
State of Connecticut Insurance Department
153 Market Street, 7th Floor
Hartford, CT 06103

Re: Stipulation and Consent Order dated May 22, 2017
Summary of Actions Taken by Boston Mutual Life Insurance Company

Dear Commissioner Wade:

As required by the Stipulation and Consent order dated May 22, 2017, Boston Mutual Life Insurance Company has conducted a review of its practices and procedures related to Connecticut statutes governing the licensing and appointment of one individual and our failure to pay one claim in a timely manner.

With respect to the appointment violation which occurred in 2015, we have determined that this was an isolated incident with a unique circumstance in our Workplace Solutions Division and is unlikely to be repeated. Nevertheless, since 2015, we have implemented improvements which provide better controls to ensure all licensed producers writing business with our company are appointed with our company. The improvements include:

1. Prior to solicitation and before we grant approval to the producer to write a case, our case implementation system checks producers against our appointment database to determine the producer's appointment status. Any individuals not properly appointed are removed from the case, or properly appoint the individuals.
2. We require producers to include their National Producer Number (NPN) on the application in the designated section. Our new business system now checks the NPN number against our appointment database for submitted applications. If the producer is not properly licensed and appointed, the application will not be accepted. Our other sales division has a similar process.
3. Boston Mutual subscribes to the National Insurance Producer Registry's ALERTS system, which notifies us of any change in a producer's licensing status.

With respect to the claim delay, again, we believe the violation was a unique and rare scenario unlikely to be repeated. Nevertheless, we have reviewed our procedures and reconfirmed that we (or our claims third party administrators) conduct training of staff to ensure that claims are reviewed for payment of all possible coverages under a policy, including those not specifically mentioned by a claimant. We also reconfirmed that we (or our third party administrators) conduct quality control reviews to ensure all possible claims are paid.

We believe that the above described processes will insure compliance with the applicable Connecticut statutes. That said, we will continue to be vigilant to insure that the processes are working satisfactorily.

Sincerely,

A handwritten signature in blue ink that reads "Grant Ward". The signature is written in a cursive style with a large, looping initial "G".

Grant David Ward, Sr.