

Insurance Reporting Townhall 09/05/24

Q & A

Q. You have said commercial policies only match on policy number. But you are also saying if we don't have the detail information there won't be matches, i.e. dummy numbers. Will those be sent back to companies to "correct". Or will they never have a match?

A. There are two "owner types" for insurance policies. Individual (Type 1) and Commercial (Type 2). These just define how the last name field is used and what customer ID types to look for (DLN vs FEIN).

I think this question is pointed at "policy types" - a policy can be vehicle-specific (V) or vehicle non-specific (NS) sometimes referred to as "Fleet policies". For NS policy types, since there will not be any vehicle information, we rely on the customer ID (usually the FEIN or legacy soundex) and company name to find new matches for vehicles. If a customer ID is not provided, or it is a dummy value, it is extremely unlikely to match new vehicles. If a NS record does not result in any vehicle matches, it will be returned to you with error code 261. We *strongly* recommend sending vehicle-specific (V) policy types whenever possible. NS policy types have always had a low match rate, and while improvements have been made to the process, it's still an inaccurate method of reporting coverage to MVA.

Q. Will you accept an out of state license number or international driver license number?

A. If any jurisdiction other than MD is inserted in the jurisdiction field, the license number will not be validated. The file will be accepted with the out of state or international license number, but there is no way to use that information in the matching process.

Q. Are we meant to capture fleet policies in the same weekly Book of Business file being sent to the DMV or do fleet policies need to be sent in their own file?

A. Vehicle Non-Specific (Fleet) policies can be included in the same Book of Business file, or in a separate file.

Q. We have a coverage verifier that reports our book of business to the states. I know other states that also require the weekly pull. The pull happens through that coverage verifier. Should we assume Maryland's pull will follow the same process?

A. If you report to MVA through an aggregator, such as LexisNexis or Verisk, the expectation is that they will handle the BOB and OLV compliance for your company. However, we would encourage you to verify with a representative from your aggregator.

Q. If we fail to report a new policy we write - how long before a case is opened? 3 weeks?

A. A case is created immediately upon the processing of a cancellation, which is determined by a previously reported policy no longer appearing in the Book of Business file. However, the

customer isn't notified immediately. 20 days after cancellation, an email is sent to the customer. On day 45, a letter is generated, and the customer is flagged for insurance lapse.

Q. If we have an assigned test date does that mean that's the only date we can test or that's our start date?

A. MVA hopes that most insurers can complete testing on the scheduled date. However, if necessary, we will be happy to add additional time to ensure testing is successful.

Q. Will we send comprehensive only policies?

A. Maryland requires minimum liability coverage for vehicles registered within the state. Comprehensive only policies do not need to be reported.

Q. For the Fleet policies - how are you matching the vehicle to the policy? We would be sending Policy Number, Named Insured and FEIN. That information may not be the registered owner - this has been our biggest matching issue.

A. For fleet policies (vehicle non-specific records), there is a 2-step process. For vehicles that are currently insured in our system, we look for a corresponding vehicle-specific (V) or vehicle non-specific (NS) record in the BOB files. If present, coverage is verified, nothing happens. If NOT present, we generate a cancellation for that vehicle. To accommodate new vehicles, we search by the FEIN and the named insured, combine those results, and apply the policy information if not already present or the commence/expiration dates are different. If no vehicles are found with this search, you will receive an error 261 for this record.

Q. If the match rate is low because the FEIN is not provided, will the customer's insurance coverage be confirmed? What are the consequences of a low match rate?

A. For a non-specific policy, exclusion of the FEIN or ID associated with the vehicle record will most likely result in a failure to match. This could potentially result in an insurance lapse case for the customer.

Q. Is it possible to hold the case creations initially (3 months or so) after go-live date to give some time to address any unforeseen issues?

A. Case creation will be temporarily delayed for two weeks after go-live.

MVA is considering a temporary delay to case creation for a short period after implementation.

Q. If a policy was in force on Friday when we run our BOB, you process on Sunday and there is a matching error, let's say the policy expires on Monday. When we run again on the next Friday, the policy would not be there anymore. Is that ok?

A. **The case creation process will start after the initial file that is unmatched. But the customer would not be flagged if they return their tags or have a new policy reported after the policy expiration.**

Q. If we complete our testing early can we go to production before 1/1/25? Also, when submitting our files weekly, are there any holiday exceptions?

A. **The Book of Business process will not be able to go into production prior to go live. However, OLV is available now. Holidays will not affect the weekly BOB process. The jobs are configured to run validation Monday through Saturday and process on Sunday.**

Q. Can you confirm how much data you expect the OLV response to contain? For context, IICMVA specifications state that, for privacy concerns, the response *should* only include essential information: coverage status on the date in question. However, the specification *can* include many other fields in the response, i.e. details about coverage, the insured party, and the vehicle.

A. **MVA will always send a VIN, NAIC, policy number, and verification date in an OLV call. Only a response of Confirmed or Unconfirmed is required.**

Q. Is the VIN number part of the match or just the customer ID? We have encountered cases where the VIN is correct on our system but not the DMV and the insured is not willing to correct with the DMV.

A. **For vehicle specific policies, the VIN is a major part of the matching criteria. An error in the VIN with MVA can prevent a policy from matching to the appropriate vehicle record. Once MVA is made aware of the error, we will ensure the VIN is corrected even if not directly requested by the customer.**

Q. Do you ask for the ID Card at the time of registration? That would give you the policy number and FEIN needed for a Fleet policy to validate against the BOB file.

A. **The ID is not currently required, but we agree that would be a best practice. This could potentially become agency policy in the future.**

Q. Do you have any requirements on reporting OLV outages, planned and unplanned? If so, how should they be reported?

A. **OLV calls that fail due to a communication error will be inserted into a retry table. The call will be made again once per day until successful for up to 5 days.**

Q. Will you provide an updated error code list for the new error reports?

A. **The error codes are included in Appendix A of the Book of Business User Guide.**

Q. Quick question if you are using Verisk, do they submit the BOB file on our behalf, or do we as the company need to do it.

A. **In our experience, Verisk typically handles both BOB submission as well as OLV. However, we would encourage you to verify with your Verisk representative.**

Q. Is there a minimum number of cars required? We have 7.

A. **There is no minimum number of vehicles required. All MD insurers are required to participate in both the weekly Book of Business submission and OLV.**

Q. Regarding BOB testing: Is there a certain volume required?

- Are there certain scenarios required?
- Will we receive both return files with errors back from Maryland?

A. **For BOB testing, MVA would prefer the entire Book of Business be submitted. There are no scenario requirements, and an error file will be returned.**

Q. Clarification for Vehicle Make- if we don't use NCIC vehicle codes and send Toyota will it just truncate? Will that produce an error?

A. **MVA does not validate the vehicle make field. Truncation is required when submitting the file, but we will accept the truncated vehicle make as submitted.**

Q. We are currently with Verisk, but plan to report independently Jan 1. Can we start OLV sooner even though Verisk is reporting OLV for us now?

A. **Yes, if you wish to switch over OLV reporting to your own endpoint, you can do that anytime. Please reach out to the Insurance Compliance Division at MDMVAICDSupport@mdot.maryland.gov to request the information needed to get that process started.**

Q. Are there any metrics we should test against when implementing OLV? For example, average requests per minute?

A. For the month of August, we sent out 924,800 OLV calls, including batch jobs. The vast majority of these were to the top 8 insurance companies. At this time, most companies can expect fewer than 200 calls per day. This may change as we find ways to include OLV into more processes.