### **Introduction**

In accordance with MGL c. 175, sec. 113H and Article IV of the Plan of Operation, each Assigned Risk Company (ARC) and Servicing Carrier is required to maintain its own Special Investigative Unit (SIU) to investigate suspicious claims, avoid payment of fraudulent claims, establish fraud deterrents, and reduce losses. All ARCs and Servicing Carriers are also required to investigate suspicious circumstances surrounding underwriting, rating, and premium issues. As a component of CAR's Compliance Audit Program, the consistency and effectiveness of each company's SIU is evaluated and measured. Audit results are provided to CAR's Compliance and Operations Committee (COPC) in its oversight role of the compliance audit program and distributed to the Division of Insurance (DOI).

The SIU Standards detailed in Appendix A of the Claims Performance Standards were approved by the Division of Insurance and require that all ARCs and Servicing Carriers provide to CAR the SIU Quarterly Activity Logs of claims and underwriting referrals investigated by the SIU. At the time of audit, a sample of 25 claims and underwriting voluntary and/or residual market referrals are selected from the activity logs to measure results for the purpose of validating adherence to the statute and Plan of Operation. Audit procedures pertaining to the SIU evaluation are documented in Appendix J of both the Private Passenger and Commercial Performance Standards.

The SIU Quarterly Activity Logs of claims and underwriting referrals used in the SIU testing are uploaded using the SIU System.

Note that pursuant to CAR Rules 10.C.2. and 32.C.2., the SIU of each ARC and Servicing Carrier is required to conduct an audit on a representative sample of policies to verify garaging and policy facts. The required template for use with private passenger and commercial reporting is located on Page 14. These completed audit reports are required to be emailed to <u>siulog@commauto.com</u>. Staff provides an annual report to the COPC and DOI that identifies industry compliance to Rule 10.C.2. and 32.C.2. at the company level.

# Logging On

Please follow these steps to access the SIU Quarterly Referrals System:

- 1. Log on to www.commauto.com using your internet browser.
- 2. Access the Reports and Applications Page by selecting 'Reports' at the top of the commauto.com home page.
- 3. Enter your user ID and password and then select 'Log-on'.
- 4. Select <u>Compliance Audit Reports</u> under the Compliance Audit section of the page.

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Recent Updates 06/02   1Q Loss Reserving E 05/25   03 2021 Volume Anal 04/02   4Q 2020 Participation 03/22   4Q 2020 Operational	ixhibits hysis Monthly n Ratios Report	Using Reports & Applications Security Administration Access Information Help Publications Update or Join Publications	Secure Access User ID Password Log-on Forgot Password
Commercial Only Corms, Manuals CAR Accounting Experience Rating Sate Edit Servicing Carrier Profile Compliance Audit Compliance Audit Reports	Financial Ceding Expense Claims Trend Deficit and Large Loss Loss Reserving Comm Exhibits Participation Ratios Settlement of Balances	Market Producer Code Notification Rate Information Residual Market Volume Volume Analysis	Reporting & Data Quality Company Status Reports Company Submission Reports Data Transfers Distributional Analysis Reconciliation Rule 29 Credit Edit Statistical Data Telecommunications Telecommunications

If you do not have access to this application, please contact your company's designated Security Administrator, who can then request access on your behalf.

# **Upload SIU Quarterly Referrals**

Two types of investigation referrals to the SIU exist: claim referrals and underwriting referrals. Each type of referral has its own SIU Quarterly Data Upload Template. Prior to submitting a data upload, determine the type of referral, then download and save the appropriate SIU Quarterly Data Upload Template. Both the claim and underwriting templates are Excel spreadsheets that are located on the Compliance Audit Report Data Upload system. Both Excel templates require a file conversion to a .csv file type. This must be performed prior to completing the upload of either the claim or underwriting referral template with company-specific data.

# <u> Data Template – Claims</u>

The following is the required filename format for the Excel spreadsheet:

# CoNo\_ReviewYear\_ReviewQtr.csv

Where:

- **CoNo** is the 3-digit company number for the upload as selected on the upload screen.
- **ReviewYear** is the current year of the upload in 'YYYY' format.
- **ReviewQtr** is the current quarter of the upload.
- For example, for company 45, ReviewYear 2021, ReviewQtr 4:
  - $\circ$  The file name is: 045\_2021\_4.csv.

Note that the correct filename format is required for data to be uploaded.

The <u>Data Template – Claims</u> is an Excel spreadsheet located on the SIU Quarterly Referral page. The template includes the following fields:

	Α	В	С	D	E	F	G	Н		J	K	L	М	N	
1	Co No	Referral Date	Policy ID	Type of Referral	Line of Business	Claim ID	Loss Date	Cause of Loss	Amount of Exposure	Amount Paid	Amount Saved	Disposition	SIU Closed Date	Policy Eff Year	
2															
3															
4															
5															
6															
7															-
8															-
9															-
10															-
11															-
12															-
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21															
22															1
23															
24															
25															-
	( )	S	IU Quarter	ly Log Tem	plate	+			: •					Þ	]

Note: Only required fields should be included in the upload process.

# Data Template – Claims (continued)

## Field Format for Upload

Once the file has the required fields populated, the file must be converted from an Excel file to a .csv file. Conversion directions can be found on Page 9.

The .csv field data must conform to the following field formats:

### Company Number:

- The three (3) digit numeric code assigned by CAR.
- The Company Number on the claim referral record must match the Company Number from the corresponding statistically reported claim record.

### Referral Date:

- The date that the SIU received for investigation.
- MM/DD/YYYY format.

### Policy ID:

- The statistically reported Policy Identification (ID) number.
- The Policy ID on the claim referral record must match the Policy ID from the corresponding statistically reported claim record.
- The number must consist only of significant alphanumeric characters.
- This field must be left-justified and must consist of at least three (3) alphanumeric characters without any spaces.
  - Note that Policy ID should be saved as a *text* field in the spreadsheet prior to conversion to the .csv file format.

#### Type of Referral:

• The only valid option is 'Claim'.

#### Line of Business:

• Valid options (must select one): 'Commercial', 'Private Passenger', or 'Taxi'.

#### Claim ID:

- The statistically reported Claim ID.
- The number must consist only of significant alphanumeric characters.
- This field must be left-justified and must consist of at least three (3) alphanumeric characters without any spaces.
  - Note that the Claim ID should be saved as a *text* field in the spreadsheet prior to conversion to the .csv file format.

#### Loss Date:

- The date on which the loss occurred.
- MM/DD/YYYY format.

#### Cause of Loss:

• Valid options (must select one): 'Liability', 'PIP', 'Physical Damage'.

# Data Template – Claims (continued)

Field Format for Upload (continued)

#### Amount of Exposure:

• Reserve amount at the time of referral or disposition.

#### Amount Paid:

• Numeric dollar value paid on the claim.

#### Amount Saved:

- Numeric dollar value difference between the dollar amount on the claim and the dollar amount paid.
  - See Appendix J of the Performance Standards (PP or Commercial) for a detailed definition of Amount Saved.

#### Disposition:

- Valid options (must select one):
  - **Closed** The file was actively handled by the SIU; the file was returned to the Claim Representative for further handling after the investigation was concluded; or the SIU closed the file and the reserve.
  - **Compromised** A settlement was reached between the SIU and the 3rd party claimant; or the claimant accepted a lower settlement than initially offered.
  - **Denied** Claim was referred to the SIU and settlement/payment was denied; or due to fraud or lack of cooperation from either the insured or claimant, no payments were issued.
  - **Not accepted** File was referred to the SIU but returned to the Claim Representative for routine handling without any further SIU assistance.
  - **Open** The SIU file investigation remains ongoing or is now in suit.
  - **Paid in Full** No reduction to the settlement amount resulting from the SIU involvement.
  - Withdrawn The insured/claimant/attorney is no longer pursuing a settlement.

#### SIU Closed Date:

- Date that the SIU closed the investigation.
- MM/DD/YYYY format.

#### Policy Effective Year:

- The effective year of the policy term in 'YYYY' format.
- The Policy Effective Year on the claim referral record must match the Policy Effective Year from the corresponding statistically reported claim record.

Once the data file has been completed, convert it to a .csv (comma separated) file for uploading.

# <u> Data Template – Underwriting</u>

The following is the required filename format for the Excel spreadsheet:

# CoNo\_ReviewYear\_ReviewQtr.csv

Where:

- **CoNo** is the 3-digit company number for the upload as selected on the upload screen.
- **ReviewYear** is the current year of the upload in 'YYYY' format.
- **ReviewQtr** is the current quarter of the upload.
- For example, for company 45, ReviewYear 2021, ReviewQtr 4:
  - $\circ$  The file name is: 045\_2021\_4.csv.

Note that the correct filename format is required for data to be uploaded.

The <u>Data Template – Underwriting</u> is an Excel spreadsheet located on the SIU Quarterly Referral page. The template includes the following fields:

	Α	В	С	D	E	F	G	Н	1	J
1	Co No	Referral Date	Policy ID	Policy Eff Year	Line of Business	Insured Name	Referral Reason	Investigation Closed Date	Investigation Outcome	Investigation Outcome Reason (optional, 500 char limit)
2										
3										
4										
5										
6										
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Note: Only required fields should be included in the upload process.

# **Data Template – Underwriting (continued)**

## Field Format for Upload

Once the file has the required fields populated, the file must be converted from an Excel file to a .csv file. Conversion directions can be found on Page 9.

The .csv field data must conform to the following field formats:

### Company Number:

- The three (3) digit numeric code assigned by CAR.
- The Company Number on the underwriting referral record must match the Company Number from the corresponding statistically reported premium record.

#### Referral Date:

- The date that the SIU received for investigation.
- MM/DD/YYYY format.

### Policy ID:

- The statistically reported Policy Identification (ID) number.
- The Policy ID on the underwriting referral record must match the Policy ID from the corresponding statistically reported premium record.
- The number must consist only of significant alphanumeric characters.
- This field must be left-justified and must consist of at least three (3) alphanumeric characters without any spaces.
  - Note that Policy ID should be saved as a *text* field in the spreadsheet prior to conversion to the .csv file format.

#### Policy Effective Year:

- The effective year of the policy term in 'YYYY' format.
- The Policy Effective Year on the claim referral record must match the Policy Effective Year from the corresponding statistically reported premium record.

#### Line of Business:

• Valid options (must select one): 'PP' (Private Passenger), or 'Comm' (Commercial).

#### Insured Name:

- The name of the policyholder.
- This field must be greater than three (3) characters.

# **Data Template – Underwriting (continued)**

Field Format for Upload (continued)

#### Referral Reason:

- Valid options (must select one):
  - Business entity concerns (Comm only)
  - o Class concerns
  - Garaging validation
  - Geographical operation (Comm only)
  - Household operators (PP only)
  - Licensing concerns
  - Principal place of business (Comm only)
  - o Other

#### Investigation Closed Date:

- Date that the SIU closed the investigation.
- MM/DD/YYYY format.

#### Investigation Outcome:

- Valid options (must select one):
  - Cancelled
  - Declined
  - Investigation Ongoing
  - Non-Renewed
  - Policy Amended or Endorsed
  - o Other

#### Investigation Outcome Reason:

• Optional text. Cannot exceed 500 characters.

Once the data file has been completed, convert it to a .csv (comma separated) file for uploading.

# How to convert Excel file to .csv

- 1. In the Excel workbook, click 'File' at the top-left of the screen and select 'Save As'.
- 2. Under the 'Other locations' header, select 'Browse'.
- 3. In the 'Save As' text box, choose 'CSV (Comma delimited)(\*.csv)' under the 'Save as type:' dropdown menu
- 4. Choose the destination folder where you want to save the file. Then select 'Save'.

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## <u>Referral Data Upload</u>

To upload SIU Quarterly Activity Logs (claims or underwriting referrals):

- 1. Select 'Referral Data Upload'.
- 2. Select the file type for upload from the drop down Claims or Underwriting.
- 3. Select 'Choose File'.
- 4. Select 'Browse' to locate and select the claims or underwriting referral .csv you created from the template (*shown on previous page*).
- 5. Select 'Upload'.

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- The result grid displays all uploads by year for a company and may be sorted by the underlined column headers.
- Be sure to select the correct file type to upload before choosing a file.

# **Referral Data Upload (Continued)**

- The accepted records can be viewed for all companies in a group or by an individual company.
- To view all records for a group, select 'All Companies' in the company dropdown box.
- The grid will display all the companies with successfully loaded data for the selected upload year.

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		6/14/2021 8:0	04:48 AM	CAR	999	0	0	13	13	279 2019	1q.csv	C
		6/14/2021 7:2	23:08 AM	CAR	999	0	0	13	13	279 2021	1.csv	U
		6/11/2021 2:0	03:21 PM	CAR	999	0	0	15	15	279_2020	4q.csv	С
		6/11/2021 1:4	48:47 PM	CAR	999	0	0	15	15	279_2020	4Q.csv	С
		6/11/2021 1:4	40:04 PM	CAR	999	0	0	15	15	279_2020	4Q.csv	С
		Accepted File Type Upload	Entire Year File to L	Not Acce Ipload se File No f	pted ile chosen							

- To review the details of a specific upload, highlight a row in the grid and select 'Accepted' for the successfully loaded data.
- To display all successfully loaded records year-to-date for the company selected, select the entire year.
- To review rejected/not accepted records, select 'Not Accepted'.
- Note that if records are rejected during the upload process for not matching the required field format, contact siulog@commauto.com and Compliance Audit staff will provide more information regarding the rejected record details.
- Also note that if multiple companies are loaded in the same log, the record load count message refers to the entire log.
  - To review the results for each company, select the company in the 'company number' dropdown to load the result grid.

# **Upload Errors:**

- Files that contain inaccurate data will be flagged with a file error and will not be processed.
- Examples below are applicable to both the Data Template Claims and Data Template Underwriting uploads, unless specifically noted.
- Note that explanations for fields that require specific numeric values or texts are detailed in the Data Template Claims and Data Template Underwriting sections of this Help Manual.
- The examples listed below will prevent a successful upload:

# Invalid File Name:

- Valid file name format is specific.
  - CoNo\_ReviewYear\_ReviewQtr.csv (CCC\_YYYY\_Q.csv)

### Invalid Co-No:

- The Company Number is not the company number assigned to the user.
- The Company Number reported is not the group associated with the user.

#### Invalid Policy Effective Year:

• The Policy Effective Year is not a valid year or is missing (null).

### Invalid Policy ID:

• The Policy ID has not been statistically reported or is missing (null).

# Invalid Claim ID:

- The Claim ID has not been statistically reported or is missing (null).
  - (Data Template Claims)

### Invalid Saved Amount:

- The Saved Amount is non-numeric or is missing (null).
  - (Data Template Claims)

#### Invalid Disposition:

- Disposition must be Closed, Compromised, Denied, Not Accepted, Open, Paid in Full, or Withdrawn.
  - (Data Template Claims)

# Invalid Loss Date:

- Loss Date must be a valid date in MM/DD/YYYY format.
  - (Data Template Claims)

# Invalid Referral Date:

• Referral Date must be a valid date in MM/DD/YYYY format.

#### SIU Closed Date

• SIU Closed Date must be a valid date in MM/DD/YYYY format.

# **Upload Errors (Continued):**

## Line Of Business

- Line of Business must be Commercial, Private Passenger, or Taxi.
   (Data Template Claims)
- Line of Business must be PP or Comm.
  - (Data Template Underwriting)

#### Other:

- Missing columns from import data.
- Submitted data does not match the Statistical record reported to CAR.

# Record already uploaded:

• The record was already uploaded into a log with the same Review Year and Review Quarter.

### Duplicate record within this upload:

- The record is in the current upload multiple times. The system only needs to match once for the data to be added to the SIU System.
- Accepted data was not removed from a corrected file. In this scenario, please resubmit only the rejected data.

# CAR Rule 10.C.2. and 32.C.2. Policy Audit Template

The Policy Audit Template should be used by all companies when its SIU is completing CAR Rule 10.C.2. or 32.C.2. audits to verify garaging and policy facts.

The completed Policy Audit Template should be attached to an email that is sent to <u>siulog@commauto.com</u>.

Do not upload the SIU-completed CAR Rule 10.C.2. or 32.C.2. audits to verify garaging and policy facts as referrals to the SIU for investigation. <u>These policies are not underwriting investigations.</u>

The template is an Excel spreadsheet and includes the following fields:

	Α	В	С	D	E	F	
1	Count	Co No	Audit Date	Policy ID	Insured Name	Outcome	
2	1						I
3	2						L
4	3						L
5	4						L
6	5						L
7	6						L
8	7						L
9	8						L
10	9						L
11	10						L
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# CAR Rule 10.C.2. and 32.C.2. Policy Audit Template (continued)

# Company Number:

• The three (3) digit numeric code assigned by CAR.

### Audit Date:

- The date that the SIU completed the audit of garaging and policy facts.
- MM/DD/YYYY format.

## Policy ID:

- The Policy ID on the Policy Audit Template must match the Policy Identification (ID) number statistically reported.
- This field must be left-justified and must consist of at least three (3) alphanumeric characters without embedded spaces or special characters.

#### Insured Name:

- The name of the policyholder.
- This field must be greater than three (3) characters.

#### Outcome or Comment:

- Select the drop-down arrow to pick from:
  - Address Change.
  - Garaging Town Change.
  - Operator Added to Policy.
  - No Issues Found.
  - Policy Cancelled or Non-Renewed.
  - Other Overwrite with Reason.
- Please do not upload the SIU-completed CAR Rule 10.C.2. or 32.C.2. audits to verify garaging and policy facts as referrals to the SIU for investigation.

Policies audited by the SIU for garaging and policy facts are not underwriting investigations.