

**The State of New Hampshire  
Insurance Department**

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**Christopher Nicolopoulos**  
Commissioner

**Alexander K. Feldvebel**  
Deputy Commissioner

**Bulletin  
Docket No.: 20-030-AB**

**TO:** All Property & Casualty Insurance Companies

**FROM:** Commissioner Christopher R. Nicolopoulos, Esq. *C.R.N.*

**DATE:** April 20, 2020

**RE:** COVID-19 P&C Expedited Reviews and Application of Certain Unfair  
Insurance Trade Practices Laws

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The Department issued a Bulletin on April 10, 2020 entitled COVID-19 Auto Insurance Payback and Credit Programs, Expedited Review. *See* Bulletin 20-025-AB. The bulletin addresses how automobile insurers can obtain expedited reviews of paybacks and credits. Since the issuance of Bulletin 20-025-AB, the Department has received filings for automobile and other lines of insurance that include offerings other than automobile paybacks and credits. Consequently, the Department has decided that further guidance is appropriate.

The COVID-19 pandemic has altered insurers' assumptions about risks in various property and casualty lines. Insurers have, for example, made premium changes to automobile policies due the reduced driving that has resulted from the Governor's stay-at-home order. Insurers have also provided some expanded coverages (examples: permitting some expanded commercial uses under personal lines automobile policies for delivery drivers and additional living expenses coverage for hospital workers under homeowners' policies) that are reasonably related to the COVID-19 pandemic without adding any rate to the policy. The Commissioner commends these efforts and continues to encourage other insurers to follow suit where appropriate by making form and/or rate filings consistent with one of the approaches described in the Bulletin 20-025-AB.

The Commissioner will not consider the above-detailed types of COVID-19-related changes to be unfairly discriminatory practices to the extent that they are reasonably and consistently applied. The Commissioner will further not regard such reasonably and consistently applied COVID-19-related changes to be violations of statutes that govern the return of premium to policyholders, limit the frequency of premium changes, or prohibit improper rebates to induce the purchase or retention of insurance so long as a filing is provided for expedited review. Although most of these actions to date have been for personal automobile insurance, this bulletin applies to all lines of property and casualty insurance.

This Bulletin will remain in effect until withdrawn by the Commissioner. For further information or to discuss the content of this bulletin, please contact Christian Citarella at the New Hampshire Insurance Department. He can be reached at (603) 271-2113 or by e-mail at [Christian.G.Citarella@ins.nh.gov](mailto:Christian.G.Citarella@ins.nh.gov).