

EXAMINATION REPORT OF
BERKLEY LIFE AND HEALTH INSURANCE COMPANY
URBANDALE, IOWA
AS OF DECEMBER 31, 2022

Urbandale, Iowa
May 13, 2024

HONORABLE DOUG OMMEN
Commissioner of Insurance
State of Iowa
Des Moines, Iowa

Commissioner:

In accordance with your authorization and pursuant to Iowa statutory provisions, an examination has been made of the records, business affairs and financial condition of

BERKLEY LIFE AND HEALTH INSURANCE COMPANY

URBANDALE, IOWA

AS OF DECEMBER 31, 2022

at its home office located at 11201 Douglas Avenue, Urbandale, Iowa.

INTRODUCTION

Berkley Life and Health Insurance Company, hereinafter referred to as the “Company”, was last examined as of December 31, 2018. The examination reported herein was conducted as a coordinated examination of the W. R. Berkley Corporation (“WRBC”) with the Delaware Insurance Department serving as the lead state. Representatives from the states of Arizona, California, North Dakota, and Texas also participated.

The following Iowa insurance entities were examined as part of the coordinated examination, with separate examination reports prepared for each entity.

Acadia Insurance Company
Berkley Assurance Company
Berkley Casualty Company/Formerly known as American Mining Insurance Company
Berkley Life and Health Insurance Company
Berkley National Insurance Company
Berkley Prestige Insurance Company
Berkley Regional Insurance Company
Carolina Casualty Insurance Company
Clermont Insurance Company
Continental Western Insurance Company
Intrepid Casualty Company
Intrepid Insurance Company
Intrepid Specialty Insurance Company
Key Risk Insurance Company
Riverport Insurance Company
StarNet Insurance Company
Tri-State Insurance Company of Minnesota
Union Insurance Company

SCOPE OF EXAMINATION

This is the regular comprehensive financial examination of the Company covering the intervening period from January 1, 2019, to the close of business on December 31, 2022, including any material transactions and events occurring and noted subsequent to the examination period.

The examination was conducted in accordance with the National Association of Insurance Commissioners (“NAIC”) Financial Condition Examiners Handbook (“Handbook”). The Handbook requires that the Division plan and perform the examination to evaluate the financial condition, identify current and prospective risks of the Company and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer’s surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management’s compliance with Statutory Accounting Principles.

The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination, an adjustment is identified, the impact of such adjustment will be documented separately following the Company’s financial statements.

The examination report includes significant findings of fact and general information about the insurer and its financial condition.

HISTORY

On May 8, 1998, John Hancock Mutual Life Insurance Company (“John Hancock”), a Massachusetts insurer, purchased all of the issued and outstanding shares of the common stock of Investors Guaranty Life Insurance Company (now known as Berkley Life and Health Insurance Company) from Great-Southern Life Insurance Company. The sale was approved by the California Department of Insurance on May 5, 1998.

On January 19, 2001, Oxford Health Plans, Inc., a health insurer with subsidiaries operating in Connecticut, New York and New Jersey, entered into a stock purchase agreement with John Hancock, to acquire all of the outstanding shares of common stock of the Company. The sale was approved by the California Department of Insurance and became final on May 22, 2001.

On July 29, 2004, upon approval from the California Department of Insurance, the Company became part of the UnitedHealth Group Incorporated via a merger of Oxford Health Plans, LLC into Ruby Acquisition, LLC, a Delaware limited liability company. The Company changed its name to Oxford Health Plans LLC and was controlled by UnitedHealth Group Incorporated.

On September 20, 2007, W. R. Berkley Corporation, an insurance holding company domiciled in the state of Delaware, acquired all of the issued and outstanding stock of Oxford Health Plans, LLC from UnitedHealth Group Incorporated. The Company became a 100% owned subsidiary of WRBC. On March 7, 2008, the Company re-domesticated from the State of California to the State of Iowa, and changed its name to Berkley Life and Health Insurance Company.

On November 1, 2011, following the approval by the Iowa Insurance Division, ownership of the Company’s common stock was transferred from WRBC to Berkley Insurance Company (“BIC”). WRBC remains the ultimate parent and controlling party of the Company.

CAPITAL STOCK AND DIVIDENDS

As of December 31, 2022, the Company had 8,500,000 shares of \$3.00 par value common stock authorized and 833,334 shares issued and outstanding and \$73,126,628 in gross paid in and contributed surplus. No dividends were issued during the examination period.

INSURANCE HOLDING COMPANY SYSTEM

The Company is a member of a holding company system as defined by Chapter 521A, Code of Iowa. The ultimate controlling entity is WRBC, a Delaware corporation based in Greenwich, Connecticut and traded on the New York Stock Exchange under the symbol WRB.

An abbreviated organizational chart identifying the location of the Iowa insurance company within the holding company system, as of December 31, 2022, is as follows:

W. R. Berkley Corporation
 Signet Star Holdings, Inc.
 Berkley Insurance Company (DE)
 Berkley Life and Health Insurance Company (IA)

MANAGEMENT AND CONTROL

SHAREHOLDERS

The corporate bylaws provide that the annual meeting of the shareholders shall be held not sooner than the 15th day of March nor later than the 30th day of June in each year, the date of the meeting within such period is to be determined by the Board of Directors of the corporation and with proper notice to be provided to shareholders and directors. At each annual meeting, the election of the directors shall occur. If the election of the directors is not held on the designated day, the board of directors shall cause the election to be held during a special meeting of the shareholders.

BOARD OF DIRECTORS

Pursuant to the Company's bylaws, management of the Company is vested in an annually elected board of directors consisting of not fewer than five members as fixed by the bylaws.

The directors duly elected and serving as of December 31, 2022, were as follows:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Term Expires</u>
Richard M. Baio West Harrison, NY	Executive Vice President – Treasurer W. R. Berkley Corporation	2023
William R. Berkley, Jr. Greenwich, CT	President and Chief Executive Officer W. R. Berkley Corporation	2023
Paul J. Hancock Brookfield, CT	Senior Vice President – Chief Actuary W. R. Berkley Corporation	2023
Carol J. LaPunzina Demarest, NJ	Senior Vice President – Human Resources W. R. Berkley Corporation	2023

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Term Expires</u>
James G. Shiel Pound Ridge, NY	Executive Vice President – Investments W. R. Berkley Corporation	2023
Philip S. Welt Stamford, CT	Executive Vice President – Secretary W. R. Berkley Corporation	2023

OFFICERS

The bylaws provide that the officers of the Company shall be a President, a Treasurer, and Secretary, and may be a Chairman of the Board, one or more executive vice presidents, one or more senior vice presidents, one or more vice presidents, assistant secretaries or assistant treasurers, or other such officers determined by the Board of Directors. Any two or more offices may be held by the same person, except for the offices of President and Secretary. No officer needs to be a Director or shareholder.

The principal officers elected and serving as of December 31, 2022, were as follows:

<u>Officers</u>	<u>Title</u>
William R. Berkley, Jr.	President
Richard M. Baio	Treasurer
Philip S. Welt	Secretary
Bertman A. Braud, Jr.	Assistant Treasurer
Thomas A. Pearce*	Assistant Secretary
Ted W. Rogers	Assistant Treasurer

*Thomas A. Pearce departed the Company in 2023 and was replaced by Michelle R. Rodemyer.

CONFLICT OF INTEREST

The Company has an established procedure for annual disclosure to its Board of Directors of any material interest or affiliation on the part of its officers, directors, or key employees that is in, or likely to, conflict with the official duties of such person. The Company requires its officers and directors to sign conflict-of-interest statements and disclose any known or potential conflict of interest as part of the annual disclosure process. An examination review of these statements indicated there were no conflicts of interest reported during the period covered by this examination.

CORPORATE RECORDS

The Articles of Incorporation and the Bylaws were not amended during the period under review.

The minutes of the meetings of the stockholders, the Board of Directors, and the committees of the Board were reviewed for the examination period. All minutes provided were signed and properly attested.

The minutes of the Board meetings showed that the Report of Examination as of December 31, 2018, by the Iowa Insurance Division was received by the Board.

FIDELITY BONDS AND OTHER INSURANCE

Under a financial institution bond, the Company is protected against loss from any fraudulent or dishonest act of any employee up to \$15,000,000 each loss occurrence and \$30,000,000 aggregate limit of liability which meets the NAIC recommended minimum amount.

The other interests of the Company appear to be adequately protected through coverages afforded by policies in force with admitted insurers.

INTERCOMPANY AGREEMENTS

Management and Administration Agreement

The Company is party to Management and Administration Agreement with Berkley Accident and Health, LLC (“Berkley A&H”). Under the terms of the agreement, Berkley A&H is employed as the Company’s manager to produce, underwrite, and service business on its behalf, including performing all administrative functions and services with respect to the business, affairs, and operation of the Company, as well as the handling and servicing of all claims and losses and legal actions resulting or arising therefrom. This agreement is to remain in effect until terminated by either party upon giving 90 days prior notice.

Investment Advisory Agreement

The Company is party to an investment management agreement with its affiliate, Berkley Dean & Company (“Berkley Dean”). Under the terms of the agreement, Berkley Dean & Company shall provide investment advisory and management services to the Company and have the authority to supervise and direct the investment and reinvestment of all Company securities, subject to investment limitations established pursuant to the terms of the agreement. The Company has ultimate and final authority over decisions and policies on purchases and sales of securities.

Tax Allocation Agreement

The Company and WRBC are party to a Tax Allocation Agreement. The tax allocation is based upon separate return calculations with the current credit for losses subject to the availability of the previous taxable income. Pursuant to the terms of the agreement, WRBC is authorized to file a consolidated federal income tax return on behalf of the Company and its affiliates for the current and future taxable years.

Net Worth Agreement

The Company is party to a Net Worth Maintenance Agreement (“Net Worth Agreement”) with W. R. Berkley Corporation, its ultimate parent. According to the Net Worth Agreement, W. R. Berkley Corporation will ensure that the Company’s net worth is maintained at 450% of the NAIC Risk Based Capital Authorized Control Level. The Company exceeded the 450% threshold each year since the agreement became effective.

Berkley Technology Services Agreement

The Company is party to a computer services agreement with an affiliate, Berkley Technology Services, LLC. Under the terms of the contract, Berkley Technology Services is responsible for providing computer and data processing services including programming, network management, operations, and consulting services to the Company.

Assignment and Amendment of Management and Administration Agreement

The Company, Berkley A&H, and BIC by its operating unit, Berkley Accident and Health are party to an Assignment and Amendment of Management and Administration Agreement (“Assignment”) to agree to the assignment and transfer of Berkley A&H’s rights, title, interest, duties, obligations, and liabilities under the original Management and Administrative Agreement noted above. BIC’s operating unit Berkley Accident and Health was replaced with Berkley A&H in the Assignment.

Berkley Connect Broker-Agent Agreement

BIC entered into a Broker-Agent Agreement on behalf of affiliate Berkley subsidiaries, including the Company, with Berkley Connect Insurance Solutions, LLC (“Berkley Connect”). Berkley Connect is licensed as an insurance broker-agent and surplus lines broker and will perform insurance marketing, brokerage, and related services.

Reinsurance Allocation Agreement

The Company is party to a reinsurance allocation agreement with WRBC and the affiliate Berkley subsidiaries, including the Company, (collectively referred to as “Cedants” or individually as “Cedant”), for WRBC to provide services to make all allocations to Cedants concerning third-party reinsurance covering a group of Berkley companies, under the terms set forth therein.

Claims Administration Agreement

BIC, on behalf of its specified Iowa domiciled Insurer Subsidiaries including the Company, and its affiliate Berkley Claims Solutions LLC (“BCS”) are party to a Claims Administration Agreement for BCS to perform specified claims handling, management, adjustment, and related services on behalf of the Company with respect to certain insurance policies issued by the Company.

EMPLOYEES' WELFARE

The Company does not have any direct employees. All personnel services and associated cost allocations are managed through the Reinsurance Pooling Agreement with Berkley Insurance Company and in some instances may be charged to the Company via the various underwriting and management agreements with the WRBC limited liability companies.

REINSURANCE

The reinsurance contracts of the Company were reviewed and no contract provisions were found to be outside the custom of the industry. All contracts had acceptable insolvency clauses and transfer of risk.

ASSUMED

The Company assumes an immaterial amount of accident and health business equaling less than 1% of premiums from a small number of non-affiliated insurers.

CEDED

As the singular life insurer subsidiary of BIC, the Company does not participate in the reinsurance pooling arrangement of the Property and Casualty entities. The Company cedes business to one authorized affiliate, as noted in the Reinsurance Allocation Agreement in the ‘Intercompany Agreements’ section above, along with several authorized non-affiliates. The remaining material amount of ceded business is ceded to numerous unauthorized non-affiliates.

All recoverable and reserve credits on business ceded to unauthorized reinsurers are secured by Funds Withheld, Letters of Credit, or Trust Agreements.

Whole Life and Annuities

Coinsurance Agreement

Prior to 1997, the Company's primary business was the sale of whole life and annuity insurance to individuals and groups. The Company ceased writing life and annuity business in 1997 when the Company was purchased by John Hancock. Concurrent with the purchase made by John Hancock, the Company entered into a coinsurance agreement with Employers Reassurance Corporation, an Overland Park, Kansas reinsurance company, to reinsure all active life and annuity policies, including deposit term business and flexible premium deferred annuities. The agreement provides for 100% of all individual and group insurance and annuity plans and riders to be reinsured by Employers Reassurance Corporation.

Quota Share Reinsurance and Administrative Agreement

The Company is party to a 100% Quota Share Reinsurance and Administration Agreement with a non-affiliated reinsurer. Under the terms of the agreement, the Company ceded a 100.0% quota share liability of its insurance in force to the reinsurer and appointed the reinsurer to provide administrative services related to a small block of business that is in run-off.

Accident and Health

For the entire Employer Stop Loss line of business, the Company has entered into an Excess of Loss Reinsurance Agreement with Swiss Re Life and Health America Inc. Under the terms of the agreement, Swiss Re Life and Health America Inc. are liable for 100% of the ultimate net loss per covered person for all claims in excess of \$4,000,000.

The Company entered into fully funded reinsurance agreements with several non-affiliated captive reinsurers. Each agreement covers specific contracts. The agreements specify different amounts of retention by the reinsurer. Amounts in excess of the reinsurers' retention are subject to the Employer Stop Loss Excess of Loss Reinsurance Agreement with Swiss Re Life and Health America Inc. referenced in the above paragraph.

For the entire Managed Care line of business, the Company entered into an Excess of Loss Reinsurance Agreement with Swiss Re Life and Health America Inc. Under the terms of the agreement, Swiss Re Life and Health America Inc. is liable for 100% of the ultimate net loss per covered person for each layer.

For the entire Special Risk line of business, the Company entered into an Excess of Loss Reinsurance Agreement with various reinsurers. Under the terms of the agreement, the reinsurers are liable for 100% of the ultimate net loss per covered person for each layer.

STATUTORY DEPOSIT

As of December 31, 2022, the book/adjusted carrying value of special deposits held in trust for the benefit of all policyholders totaled \$1,042,450. The book/adjusted carrying value of special deposits held in trust not for the protection of all policyholders of the Company totaled \$89,804,337 and was distributed as follows:

Arkansas	\$ 155,763
Georgia	30,445
Iowa	88,995,542
New Mexico	202,969
North Carolina	419,618

TERRITORY AND PLAN OF OPERATION

As of December 31, 2022, the Company is licensed in all fifty states and the District of Columbia. The Company distributes through large and regional brokers and product specialists including third party administrators, consultants, and managing general underwriters. The Company does not anticipate direct marketing to individual customers.

The Company's product lines are segregated into four segments, Employer Stop Loss ("ESL"), providing specific stop loss and aggregate stop loss, Group Captive ("GC"), consisting of stop loss coverage reinsured through captive arrangements, Managed Care ("MC"), providing excess of loss and HMO reinsurance, and Specialty Accident ("SA"), specializing primarily in participant accident, student accident, intercollegiate sports accident, and corporate accident coverages. The Company's business approach is focused on building its four core segments (ESL, GC, MC, and SR) by providing brand identity as a "direct writer", distribution through preferred relationships, and building a reputation for risk management and experienced leadership. The Company competes nationwide in a market that is extremely competitive and is challenged by the dynamics of healthcare, increased regulation at the state level, the growth of self-funded plans, and medical inflation. The Company's underwriting is performed centrally through its offices located in Hamilton, New Jersey, Marlborough, Massachusetts and Hartford Connecticut.

The five states with the largest direct premium and annuity considerations collected in 2022 were:

<u>State</u>	<u>Direct Premiums</u>	<u>Percentage of Total</u>
California	40,322,785	7.5%
Florida	27,977,932	5.2%
Georgia	26,030,770	4.9%
Texas	66,840,456	12.5%
New York	36,634,282	6.8%
Total all states	\$536,079,321	100.0%

GROWTH OF COMPANY

The growth of the Company is reflected by the following data obtained from the Company's filed annual statements and covers the examination period:

(000's Omitted)

<u>Year</u>	<u>Admitted Assets</u>	<u>Surplus as Regards Policyholders</u>	<u>Premiums Written Accident & Health</u>	<u>Net Investment Income Gain</u>	<u>Net Income</u>
2019	\$ 363,125	\$ 192,020	\$ 271,625	\$ 9,309	\$ 28,012
2020	395,737	234,483	221,370	7,387	45,239
2021	478,171	291,220	239,884	4,754	57,382
2022	568,510	363,293	261,378	8,618	67,774

ACCOUNTS AND RECORDS

Trial balances of the Company's general ledgers were taken for each year under examination and were found to be in agreement with the office copies of the filed annual statements for those years. Cash receipts and disbursements were tested to the extent deemed necessary.

During the course of the examination, no material aggregate surplus difference was identified from the amount reflected in the financial statements, as presented in the annual statement at December 31, 2022.

SUBSEQUENT EVENTS

The Inflation Reduction Act (Act) was enacted on August 16, 2022, and included a new corporate alternative minimum tax (CAMT). The Act and the CAMT go into effect for tax years beginning after 2022. The Company has determined that it does not expect to be liable for CAMT in 2023 however, it is awaiting further clarification from the United States Treasury with regard to application of the rules which were outlined in the Act.

FINANCIAL STATEMENTS
AND COMMENTS THEREON

NOTE: The following financial statements are based on the statutory financial statements filed by the Company with the Iowa Insurance Division and present the financial condition of the Company for the period ending December 31, 2022.

STATEMENT OF ASSETS AND LIABILITIES

ASSETS

	<u>Assets</u>	<u>Non-Admitted</u>	<u>Admitted</u>
Bonds	\$ 447,896,879	\$	\$ 447,896,879
Cash, cash equivalents and short-term investments	88,584,131		88,584,131
Receivables for securities	42,123		42,123
Investment income due and accrued	2,723,650		2,723,650
Uncollected premiums and agents' balances in the course of collection	8,270,987	1,400,206	6,870,781
Deferred premiums, agents' balances and installments booked but deferred and not yet due	1,421,490		1,421,490
Amounts recoverable from reinsurers	18,815,468		18,815,468
Net deferred tax asset	2,056,224		2,056,224
Guaranty funds receivable or on deposit	548,484	548,484	0
Electronic data processing equipment and software	99,478		99,478
Furniture and equipment	150,433	150,433	0
Prepaid expenses	2,016,246	2,016,246	0
Deferred revenue on investments	977,217	977,217	0
	<hr/>	<hr/>	<hr/>
Total Assets	\$ 573,602,811	\$ 5,092,586	\$ 568,510,225

LIABILITIES, SURPLUS AND OTHER FUNDS

Aggregate reserve for accident and health contracts	\$ 14,425,741
Contract claims; accident and health	105,649,922
Premiums and annuity considerations for life and accident and health contracts received in advance	1,865,310
Other amounts payable on reinsurance	19,735,651
Interest maintenance reserve	189,080
Commissions to agents due or accrued	2,143,524
Commissions and expense allowances payable on reinsurance assumed	87,151
General expenses due or accrued	9,416,168
Taxes, licenses and fees due or accrued, excluding federal income taxes	5,329,342
Current federal and foreign income taxes	2,951,446
Amounts withheld or retained by reporting entity as agent or trustee	(92,089)
Remittances and items not allocated	489,289
Asset valuation reserve	1,485,288
Reinsurance in unauthorized and certified companies	39,661
Funds held under reinsurance treaties with unauthorized and certified reinsurers	36,642,944
Payable to parent, subsidiaries and affiliates	<u>2,358,484</u>
 Total Liabilities	 <u>\$ 202,716,913</u>
 Common capital stock	 2,500,002
Gross paid in and contributed surplus	73,126,628
Unassigned funds (surplus)	<u>290,166,682</u>
 Surplus as regards policyholders	 <u>\$ 363,293,310</u>
 Total Liabilities and Surplus	 <u>\$ 568,510,225</u>

SUMMARY OF OPERATIONS

Premiums and annuity considerations for life and accident and health contracts	\$ 261,378,352
Net investment income	8,617,791
Amortization of Interest Maintenance Reserves	(25,619)
Commissions and expense allowances on reinsurance ceded	62,355,489
Total income	<u>\$ 332,326,013</u>
Disability benefits and benefits under accident and health contracts	165,283,427
Increase in aggregate reserves for life and accident and health contracts	400,444
Commissions on premiums, annuity considerations, and deposit-type contract funds	22,933,869
Commissions and expense allowances on reinsurance assumed	226,553
General insurance expenses and fraternal expenses	43,243,524
Insurance taxes, licenses and fees, excluding federal income taxes	14,392,561
Miscellaneous income	(414)
Total expenses	<u>\$ 246,479,963</u>
Net gain from operations after dividends to policyholders, refunds to members and before federal income taxes	85,846,050
Federal and foreign income taxes incurred	18,072,189
Net income	<u>\$ 67,773,861</u>

CAPITAL AND SURPLUS ACCOUNT

Capital and surplus prior reporting year	<u>\$ 293,720,173</u>
Net income	67,773,861
Change in net unrealized capital gain	1,327,538
Change in net deferred income tax	456,738
Change in non-admitted assets	(947,356)
Change in liability for reinsurance in unauthorized and certified companies	353,056
Change in asset valuation reserve	(241,892)
Change in deferral of realized gains on investment transfer to affiliate	3,351,192
Net change in capital and surplus for the year	<u>\$ 72,073,138</u>
Capital and surplus end of reporting period	<u>\$ 365,793,312</u>

CASH FLOW

Cash from Operations

Premiums collected net of reinsurance	\$ 262,508,182	
Net investment income	9,588,251	
Miscellaneous income	62,355,489	
Total		<u>\$ 334,451,922</u>
Benefit and loss related payments	155,485,840	
Commissions, expenses paid and aggregate write-ins for deductions	81,252,675	
Federal and foreign income taxes paid (recovered)	16,335,000	
Total		<u>\$ 253,073,515</u>
Net cash from operations		<u>\$ 81,378,407</u>

Cash from Investments

Proceeds from investments sold, matured or repaid:		
Bonds	\$ 224,819,744	
Total investment proceeds		<u>\$ 224,819,744</u>
Cost of investments acquired:		
Bonds	\$ 278,889,822	
Miscellaneous applications	53,077	
Total investments acquired		<u>\$ 278,942,899</u>
Net cash from investments		<u>\$ (54,123,155)</u>

Cash from Financing and Miscellaneous Sources

Other cash provided (applied)	\$ 1,768,483	
Net cash from financing and miscellaneous sources		<u>\$ 1,768,483</u>

Reconciliation of Cash, Cash Equivalents, and Short-Term Investments

Net change in cash, cash equivalents and short-term investments		\$ 29,023,735
Cash, cash equivalents and short-term investments:		
Beginning of year		59,560,397
End of year		<u>\$ 88,584,131</u>

CONCLUSION

The cooperation and assistance extended by the officers and employees of the Company during the course of this examination is hereby acknowledged.

In addition to the undersigned, examiners, information systems specialists, and actuarial specialists from The INS Companies (INS Regulatory Insurance Services, Inc., INS Services, Inc., and INS Consultants, Inc.), participated in the examination and the preparation of this report.

Respectfully submitted,

/s/ Cecilee Diamond-Houdek _____
Cecilee Diamond-Houdek, CFE, CPA, MCM
Examiner-in-Charge
INS Regulatory Insurance Services, Inc.
on behalf of the Insurance Division
State of Iowa

/s/ Amanda Theisen _____
Amanda Theisen, CFE, PIR, MCM
Supervisor and Assistant Chief – Examinations
Insurance Division
State of Iowa