

# Regulatory Analysis Form

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IRRC REGULATORY REVIEW COMMISSION

IRRC Number: 2154

(1) Agency

Insurance Department

(2) I.D. Number (Governor's Office Use)

11-197

(3) Short Title

Discounting Medical Malpractice Loss Reserves

(4) PA Code Cite

31 Pa. Code, Chapter 118, §§118.1-118.6

(5) Agency Contacts & Telephone Numbers

Primary Contact: Peter J. Salvatore, Regulatory Coordinator,  
1326 Strawberry Square, Harrisburg, PA 17120, (717) 787-4429  
Secondary Contact:

(6) Type of Rulemaking (check one)

- Proposed Rulemaking  
 Final Order Adopting Regulation  
 Final Order, Proposed Rulemaking Omitted

(7) Is a 120-Day Emergency Certification Attached?

- No  
 Yes: By the Attorney General  
 Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The Department proposes that Chapter 118, sections 118.1-118.6 be amended to assure the continued availability of medical malpractice insurance via the voluntary market at the primary level and to be consistent with current actuarial practice and economic conditions. The proposed amendments will prohibit discounting on policies with an effective date of January 01, 2001 or later. The proposed amendments will also allow insurers who currently discount, to be able to run off that discounting over a 10 year period.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

The Department proposes to amend this regulation under the authority of the act of May 17, 1921, P.L. 682, No. 284 (40 P.S. §§341-999); the act of May 17, 1921, P.L. 789, No. 285 (40 P.S. §§1-321); and Sections 206, 506, 1501 and 1502 of the Administrative Code of 1929 (71 P.S. §§66, 186, 411 and 412).

## Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

No.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

The Insurance Department seeks to amend Chapter 118, §§118.1-118.6 to be consistent with the authorizing statute. Moreover, it is in the public interest to amend the regulation to prohibit future discounting of medical malpractice insurance to ensure that proper reserves are maintained for future claims.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

There are no public health, safety, environment or general welfare risks associated with this rulemaking.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

The medical profession will benefit from the regulation to the extent that it will be more consistent with the authorizing statute.

## **Regulatory Analysis Form**

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

There will be no adverse effects on any party as a result of the amendment of this regulation.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

The regulation applies to all insurers licensed to sell medical malpractice insurance and who do business in the Commonwealth.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

Comments regarding the amendment of this regulation were solicited from the various trade associations representing the insurance industry. The Pennsylvania Medical Society Liability Insurance Company (PMSLIC) was instrumental in assisting the Department with language that achieved the desired results.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The amendment of the regulation will not have any impact on costs associated with insurance companies or the medical profession. Currently, medical malpractice carriers are allowed to discount their liabilities, if they satisfy certain minimum requirements. The amendment of this regulation will require carriers to get the Department's permission to discount liabilities written with an effective date of January 1, 2001 or later. There is no cost associated with this change. Insurers who previously discounted their medical malpractice reserves will be permitted to discount booked reserves until December 31, 2010.

**Regulatory Analysis Form**

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

There are no costs or savings to local governments associated with this rulemaking.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

There are no costs or savings to state government associated with this rulemaking. The current practice and method of reviewing financial statements will not change due to the amendment of this regulation.

## Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years. N/A

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
<b>SAVINGS:</b>	\$	\$	\$	\$	\$	\$
Regulated Community						
Local Government						
State Government						
<b>Total Savings</b>						
<b>COSTS:</b>						
Regulated Community						
Local Government						
State Government						
<b>Total Costs</b>						
<b>REVENUE LOSSES:</b>						
Regulated Community						
Local Government						
State Government						
<b>Total Revenue Losses</b>						

(20a) Explain how the cost estimates listed above were derived.

N/A.

**Regulatory Analysis Form**

(20b) Provide the past three year expenditure history for programs affected by the regulation.  
N/A.

Program	FY -3	FY -2	FY -1	Current FY

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

No costs or adverse effects are anticipated as a result of this regulation.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

Amending Chapter 118, §§118.1-118.6 is the most efficient method to achieve consistency with the authorizing statute. No other alternatives were considered.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

No other regulatory schemes were considered. The amendment of the regulation is the most efficient method of updating the regulatory requirements.

### **Regulatory Analysis Form**

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

No.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

The rule making will not put Pennsylvania at a competitive disadvantage with other states. Only one other state (Indiana) currently has a standard practice of discounting. Under the current regulation, there is an inconsistency in the financial reporting of insurance companies between companies that discount and those that don't.

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

No public hearings or informational meetings are anticipated.

## Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

The amendment of the regulation imposes no additional paperwork requirements on the Department, the insurers, the medical profession or the general public.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

The rulemaking will have no effect on special needs of affected parties.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The rulemaking will undergo a 30-day public comment period and will take effect upon approval of the final form regulation by the legislative standing committees, the Office of the Attorney General, and the Independent Regulatory Review Commission and upon final publication in the *Pennsylvania Bulletin*.

(31) Provide the schedule for continual review of the regulation.

The Department reviews each of its regulations for continued effectiveness on a triennial basis.



<p>CDL-1</p> <p style="text-align: center;"><b>FACE SHEET FOR FILING DOCUMENTS WITH THE LEGISLATIVE REFERENCE BUREAU</b></p> <p style="text-align: center;">(Pursuant to Commonwealth Documents Law)</p> <p style="text-align: center; font-size: 2em;">2154</p>	<p style="text-align: right;">RECEIVED</p> <p style="text-align: right;">2001 JAN 25 PM 4:24</p> <p style="text-align: right;">INDEPENDENT AGENCY REVIEW COMMISSION</p> <p style="text-align: right;">DO NOT WRITE IN THIS SPACE</p>	
<p>Copy below is hereby approved as to form and legality. Attorney General</p> <p><i>[Signature]</i></p> <p>By _____ (Deputy Attorney General)</p> <p style="text-align: center;">OCT 03 2000</p> <p style="text-align: center;">Date of Approval</p> <p>→ Check if applicable. Copy not approved. Objections attached.</p>	<p>Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p style="text-align: center;">Insurance Department</p> <p style="text-align: center;">(AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. 11-197</p> <p>DATE OF ADOPTION: _____</p> <p>BY: <i>[Signature]</i></p> <p style="text-align: center;">M. Diane Koken Insurance Commissioner</p> <p>TITLE: _____ (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies</p> <p><i>[Signature]</i></p> <p style="text-align: center;">7/25/00</p> <p style="text-align: center;">DATE OF APPROVAL</p> <p style="text-align: center;">(DEPUTY GENERAL COUNSEL) <del>(CHIEF COUNSEL, INDEPENDENT AGENCY)</del> (STRIKE INAPPLICABLE TITLE)</p> <p>→ Check if applicable. No Attorney General approval or objection within 30 days after submission.</p>

**Insurance Department**

**Notice of Proposed Rulemaking**

31 PA Code, Chapter 118  
§§118.1-118.6

**Discounting Medical Malpractice Loss Reserves**

## **PREAMBLE**

The Insurance Department ("Department") proposes to amend Title 31, Pennsylvania Code, Chapter 118, Sections 118.1-118.6, Discounting of Medical Malpractice Loss Reserves, as set forth in Annex A, under the authority of the act of May 17, 1921, P.L. 682, No. 284 (40 P.S. §§341-999); the act of May 17, 1921, P.L. 789, No. 285 (40 P.S. §§1-321); and Sections 206, 506, 1501 and 1502 of the Administrative Code of 1929 (71 P.S. §§66, 186, 411 and 412).

### **Purpose**

Chapter 118 was initially promulgated to establish procedural and reporting requirements and restrictions on the discounting of medical malpractice loss reserves. This proposed rulemaking amends Chapter 118 of Title 31 of the Pennsylvania Code to be consistent with current actuarial practice and economic conditions.

### **Explanation of Regulatory Changes**

Section 118.1 (relating to definitions) is being updated to define terms not previously defined in the regulation.

Section 118.2 (relating to reporting and data collection requirements) is being revised to refer to applicable sections of the Insurance Department Act of 1921 rather than the entire act.

Section 118.3 (relating to restrictions on discounting loss reserves) is being revised to include two new provisions. The first provision will prohibit insurers from discounting loss reserves or loss adjustment expense reserves on all policies with a January 1, 2001 or later effective date. The second provision will prohibit insurers from discounting of loss reserves or loss adjustment expense reserves after December 31, 2010. The Department believes that the elimination of discounting is consistent with the authorizing statute and will ensure that proper reserves are maintained for future claims. In January 2001, the National Association of Insurance Commissioners (NAIC) will require all insurers to follow the recently adopted Statements of Statutory Accounting Principles which specifically prohibits discounting of medical malpractice reserves unless the insurer is allowed to do so by statute or regulation or requests a permitted practice from the Department (regulatory authority). In addition, many states do not permit discounting of loss reserves, therefore, the additional provisions will not create a hardship on the insurers engaged in the business of medical malpractice insurance. The Department also believes that allowing insurers to phase out the booked discounts over a 10-year period is in the best interest of all involved. This section is also being revised to refer to applicable sections of the Insurance Department Act of 1921 rather than the entire act.

Section 118.6 (relating to increased loss reserves and loss adjustment expense reserves) is being revised to refer to applicable sections of the Insurance Department Act of 1921 rather than the entire act.

**Fiscal Impact**

There is no fiscal impact as a result of the amendment of this regulation.

**Paperwork**

The amendment of this regulation will affect all licensed medical malpractice insurers domiciled in the Commonwealth.

**Effectiveness/Sunset Date**

The rulemaking will become effective upon final publication in the *Pennsylvania Bulletin*. Because the rulemaking proposes to amend the regulation with restrictions, a sunset date of December 31, 2010 has been assigned.

**Contact Person**

Questions or comments regarding the proposed rulemaking may be addressed in writing to Peter J. Salvatore, Regulatory Coordinator, Pennsylvania Insurance Department, 1326 Strawberry Square, Harrisburg, Pennsylvania 17120, within 30 days following the publication of this notice in the *Pennsylvania Bulletin*. Questions and comments may also be e-mailed to [psalvato@ins.state.pa.us](mailto:psalvato@ins.state.pa.us) or faxed to (717) 772-1969.

**Regulatory Review**

Under section 5(a) of the Regulatory Review Act (71 P.S. §745.5(a)) the agency submitted a copy of this regulation on October 11, 2000 to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the Senate Banking and Insurance Committee and the House Insurance Committee. In addition to the submitted regulation, the agency has provided the Commission and the Committees with a copy of a detailed Regulatory Analysis Form prepared by the agency in compliance with Executive Order 1996-1, "Regulatory Review and Promulgation." A copy of that material is available to the public upon request.

If IRRC has any objections to any portion of the proposed amendments, it will notify the agency within 10 days after the close of the committees' review. The notification shall specify the regulatory review criteria that have not been met by that portion. The Regulatory Review Act (71 P.S. §§ 745.1-745.14) specifies detailed procedures for the agency, the Governor and the General Assembly to review these objections before final publication of the regulations.

M. Diane Koken  
Insurance Commissioner

CONTINUATION SHEET FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU  
(Pursuant to Commonwealth Documents Law)

ANNEX A

Title 31. Insurance. Part VII. Property, Fire and Casualty Insurance, Chapter 118. Discounting of Medical Malpractice Loss Reserves.

Sec.

118.1. Definitions.

118.2. Reporting and data collection requirements.

118.3. Restrictions on discounting loss reserves.

118.4. Actuarial certification.

118.5. Reserves for loss adjustment expenses.

118.6. Increased loss reserves and loss adjustment expense reserves.

**§ 118.1. Definitions.**

(a) The definitions utilized in Chapter 116 (relating to discounting of worker's compensation loss reserves) are incorporated for use in this chapter except that language utilizing the term[s] "worker's compensation" shall be amended for use in this chapter utilizing the term[s] "medical malpractice".

(b) For purposes of this chapter, the definition of "insurance company" in § 116.1 (relating to definitions) also includes the Pennsylvania Professional Liability Joint Underwriting Association, an insurance entity created under section 801 of the Health Care Services Malpractice Act (40 P. S. § 1301.801).

(c) The term "independent actuary" as used in § 118.4(a) (relating to actuarial certification) means a fellow or associate of the Casualty Actuarial Society with appropriate experience in responsible actuarial work, including medical malpractice, who is not an officer, director or employe of the insurer whose reserves he is certifying.

(d) Other definitions:

Act - The Insurance Department Act of 1921 (40 P.S. § 1 et seq.)

Commissioner - The Insurance Commissioner of the Commonwealth

Department - The Insurance Department of the Commonwealth

**§ 118.2. Reporting and data collection requirements.**

For loss reserves established by insurance companies under sections 312-316 of [The Insurance Department Act of one thousand nine hundred and twenty-one] the act (40 P. S. §§ 111-115), a company is permitted to discount the medical malpractice reserves to their present value if the company complies with the following requirements. The insurance company shall:

(1) File an annual actuarial certification of its medical malpractice loss reserves and loss adjustment expense reserves with the Department simultaneously with the filing of the company's annual statement.

(2) Provide a written notice to the Department stating its intent to maintain separate data regarding the company's loss payment patterns for allocated loss adjustment expenses and losses. This data shall be regularly compiled and submitted to the Department upon request.

(3) Comply with existing annual statement instructions for reporting loss and loss adjustment expense reserves including completion of supplemental Schedule P, Part 4C of the annual statement.

(4) File with its annual statement a description of the underlying assumptions for the calculation of the discount to present value of its loss reserves and allocated loss adjustment expense reserves.

**§ 118.3. Restrictions on discounting loss reserves.**

The discounting of loss reserves is subject to the following limitations:

(1) The loss reserves discounted to present value in accordance with this chapter may not be less than those required in accordance with section 313(b) of [The Insurance Department Act of one thousand nine hundred and twenty-one] the act (40 P. S. § 112(b)).

(2) The maximum rate of interest which an insurer may assume for purposes of discounting is 6%.

(3) An insurer may request an exception to the maximum interest rate in paragraph (2) if the insurer can demonstrate to the satisfaction of the Commissioner that its investment yield justifies a higher interest rate assumption. The Commissioner may require the insurer to submit additional documentation to support its request for approval of a higher interest rate assumption. The Commissioner will act upon requests for exceptions made under this paragraph within 90 days of the date the request is received by the Insurance Department.

(4) An insurer shall not discount loss reserves or loss adjustment expense reserves for policies with an effective date on or after January 1, 2001.

(5) An insurer may not discount loss reserves or loss adjustment expense reserves after December 31, 2010.

**§ 118.4. Actuarial certification.**

(a) The actuarial certification required in accordance with this chapter shall be prepared by an independent actuary and filed by the insurer with its annual statement.

(b) The actuarial certification shall be filed each year in which the insurer discounts its loss reserves.

(c) The actuarial certification shall include the opinion of an independent actuary with respect to the following:

(1) The adequacy of medical malpractice loss reserves on an undiscounted basis.

(2) The sufficiency of the investment yield on invested assets to fund the discount.

(3) The reasonableness of the matching of the invested assets and loss reserves attributable to the medical malpractice business to provide an adequate income stream to fund the discount.

**§ 118.5. Reserves for loss adjustment expenses.**

(a) Loss adjustment expense reserves shall be calculated in accordance with the following standards:

(1) Insurance companies are not permitted to discount loss adjustment expense reserves which are not allocable to specific claims.

(2) Insurance companies are permitted to discount loss adjustment expense reserves which are allocable to specific claims if:

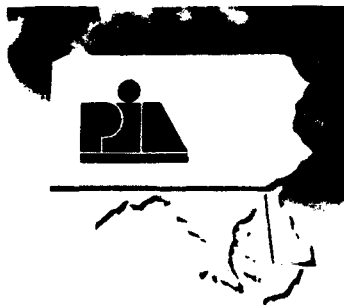
(i) The company demonstrates, to the satisfaction of the Commissioner, the validity of the assumptions underlying the calculation of the reserves.

(ii) The actuarial certification which includes the opinion of an independent actuary with respect to the criteria in § 118.4 (relating to actuarial certification) is applicable to the loss adjustment expense reserves as well as the loss reserves.

(b) In evaluating an insurance company's request to discount allocated loss adjustment expense reserves, the Commissioner will consider the company's specific loss adjustment expense payment pattern and the interest rate assumption.

**§ 118.6. Increased loss reserves and loss adjustment expense reserves.**

Under section 316 of [The Insurance Department Act of one thousand nine hundred and twenty-one] the act (40 P. S. § 115), the Commissioner may require an insurance company to restate its loss reserves or its allocated loss adjustment expense reserves by reducing or eliminating the discount if the Commissioner determines it is necessary to insure that reserves are established at an adequate level.



October 31, 2000

Peter J. Salvatore  
Regulatory Coordinator  
Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120

Dear Mr. Salvatore,

Re: Proposed rulemaking: Discounting Medical Malpractice Loss Reserves

The Insurance Department states in the proposed rulemaking that there will be no fiscal impact as a result. PIA wishes to question on what basis this conclusion was reached and whether or not there was any consideration given to the impact upon insurance premium rates for policyholders. As a general rule, PIA has always understood that the Insurance Department has always considered investment income during the rate review process. This consideration thus reduced the ultimate rate approved in accordance with the statutory duty of the Commissioner that rates shall not be excessive, inadequate or unfairly discriminatory.

By not permitting loss reserve discounting, it would appear that rates would have to be adjusted upward to compensate in the rate filing. That would produce higher premium rates to policyholders, however, PIA recognizes that premiums may remain the same.

Any insight the Insurance Department could provide on this question is appreciated.

Sincerely,

Joseph T. Leighton, Esq.  
VP of Government & Industry Affairs  
PIA of PA, MD, DE

5050 Ritter Road  
P.O. Box 2023  
Mechanicsburg, PA  
17055-0763  
Phone (717) 795-9100  
Fax (717) 795-8347



**The Insurance Federation of Pennsylvania, Inc.**

1600 Market Street  
Suite 1520  
Philadelphia, PA 19103  
Tel: (215) 665-0500 Fax: (215) 665-0540  
E-mail: mailbox@ifpenn.org

**John R. Doubman**  
Secretary & Counsel

October 30, 2000

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**Office of Special Projects**

Peter J. Salvatore,  
Regulatory Coordinator  
Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120

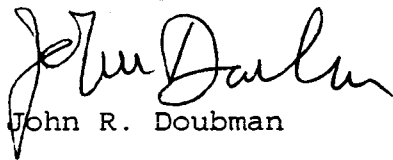
**Re: Discounting Medical Malpractice Loss Reserves: 31  
Pa. Code Chapter 118; 11-197**

Dear Mr. Salvatore:

The Insurance Federation supports the proposed regulation amending Chapter 118 to bring the procedural and reporting requirements and restrictions on discounting medical malpractice loss reserves into conformity with current actuarial practice and economic conditions. The Federation has reviewed the regulation with our interested members and we support the regulation.

Thank you for the opportunity to comment on the regulation. Feel free to call with any questions or comments.

Sincerely,



John R. Doubman

c: Robert E. Nyce, Executive Director  
Independent Regulatory Review Commission

Honorable Edwin G. Holl, Chairman  
Senate Banking and Insurance Committee

Honorable Nicholas A. Micozzie, Chairman  
House Insurance Committee



**COMMONWEALTH OF PENNSYLVANIA  
INSURANCE DEPARTMENT**

**SPECIAL PROJECTS OFFICE**  
1326 Strawberry Square  
Harrisburg, PA 17120

Phone: (717) 787-4429  
Fax: (717) 772-1969  
E-mail: [psalvatore@state.pa.us](mailto:psalvatore@state.pa.us)

January 25, 2001

Mr. Robert Nyce  
Executive Director  
Independent Regulatory Review Comm.  
333 Market Street  
Harrisburg, PA 17101

Re: Insurance Department  
Proposed Regulation No. 11-  
197, Discounting Medical  
Malpractice Loss Reserves

Dear Mr. Nyce:

Under Section 5(a) of the Regulatory Review Act (71 P.S. §745.5(a)), the Department submitted a copy of the proposed regulation on October 11, 2000 to the Independent Regulatory Review Commission and the Legislative Standing Committees. Because the legislature has adjourned sine die, the Department is again submitting the regulation to the Senate Banking and Insurance Committee and the House Committee on Insurance. In addition to re-submitting the proposed regulation, the Department is providing the Commission and the Committees, with a detailed regulatory analysis form in compliance with Executive Order 1996-1. The Department is also re-submitting comments that were received during the 30-day public comment period. These comments were originally delivered to the Committees during the time required by the act in 2000.

Pursuant to Section 5(e) of the Regulatory Review Act (71 P.S. §745.5(e)), the Committees had review of this regulation for nine (9) days. Because the Committees did not have the full 20-day allotment to review the regulation, the Department is resubmitting this regulation for the remainder of the Committees' review.

If you have any questions regarding this matter, please contact me at (717) 787-4429.

Sincerely yours,

Peter J. Salvatore  
Regulatory Coordinator

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE  
REGULATORY REVIEW ACT**

I.D. NUMBER: 11-197  
 SUBJECT: Discounting Medical Malpractice Loss Reserves  
 AGENCY: DEPARTMENT OF INSURANCE

RECEIVED  
 2001 JAN 25 PM 4: 27  
 REGULATORY  
 REVIEW COMMISSION

**TYPE OF REGULATION**

- Proposed Regulation
- Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor
- Delivery of Tolled Regulation
  - a. With Revisions
  - b. Without Revisions

**FILING OF REGULATION**

DATE	SIGNATURE	DESIGNATION
10/14/00	<i>Sheila Eckhart</i>	HOUSE COMMITTEE ON INSURANCE
<del>10/14/00</del>	<del><i>[Signature]</i></del>	
10/14/00	<i>Doreen Mitchell</i>	SENATE COMMITTEE ON BANKING & INSURANCE
11/25/00	<i>Doreen Mitchell</i>	
10/11/00	<i>Dina Eckert</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
11/25/00	<i>Elena Pagan</i>	ATTORNEY GENERAL
10/14/00	<i>C.L. Brown</i>	LEGISLATIVE REFERENCE BUREAU

October 4, 2000