



CLIENT BULLETIN

Insurance Payment Extensions and Other Relief Due to the Financial Strains Caused by COVID-19

The COVID-19 pandemic is causing significant financial strain on the economy as layoffs and furloughs follow shut down and shelter-in-place directives across the country. In order to assist those impacted and to ease some of their financial burdens, many states are requesting that insurance carriers across all lines of business provide longer grace periods for premium payments and other accommodations to maintain coverage and access to insurance during this public health emergency.

The following summary outlines steps the various state departments of insurance are taking to encourage insurers to work with those insureds who are concerned about their ability to timely pay their insurance premiums. While many of these efforts come in the form of recommendations, instructions and requests, rather than directives and outright orders, some states are issuing more strongly worded directives and moratoriums.

This is an ongoing effort and we will update this summary as the efforts to respond to the COVID-19 pandemic further evolve.

ALABAMA

Issuing Agency: Department of Insurance

Document: [Bulletin No. 2020-05](#) (March 30, 2020)

The Bulletin applies to all commercial and personal lines of insurance, including property, casualty, disability, accident and health, and life insurance policies and it recommends insurers consider the following actions for applicable policies in force as of March 13, 2020:

- Relaxing due dates for premium payments
- Extending grace periods
- Waiving late fees and penalties
- Allowing premium payment plans which will avoid a lapse in coverage

Insurers should consider cancellation or non-renewal of policies only after exhausting all efforts to work with policyholders to continue coverage. A policy may be cancelled or non-renewed for legally recognized reasons or policy provisions other than late or failure to pay premiums.

In order to protect policyholders, workers and the general public, the commissioner requests that insurers, producers and other licensees who accept premium payments consider alternate methods of payment. The methods need to be consistent with safe social distancing standards and eliminate the need for in person payment. This may include online or other electronic transfers.



Affected policyholders should notify their insurance carrier or producer to explain their individual situation and difficulties complying with payment schedules.

ALASKA

Issuing Agency: Department of Commerce, Community, and Economic Development,
Division of Insurance

Document: [Bulletin No. B 20-08](#) (March 18, 2020)

The Bulletin applies to all lines of insurance and it includes the following guidelines:

- Carriers are prohibited from terminating insurance contracts due to non-payment. The DOI will work with carriers to minimize the regulatory effects of such extension. The extension of the grace period does not eliminate the obligation to pay the premium, but limits policy cancellation for late payment. Carriers are encouraged to work with policyholders in the collection of premiums and to waive all late fees.

The Bulletin remains in effect until June 1, 2020.

ARKANSAS

Issuing Agency: Department of Insurance

Document: [Bulletin No. 6-2020](#) (March 20, 2020)

The Bulletin applies to all admitted and surplus lines insurance carriers doing business in Arkansas and all other interested parties and it advises that:

- All insurers and other regulated industries must continue to adjust claims as expeditiously as possible in compliance with the provisions of AID 43 and utilize all possible methods of adjusting claims remotely, such as telephone, email, facsimile, mobile applications, satellite imagery or 3D mapping, all the while striving to meet normal times frames for the adjustment and resolution of claims whenever possible.
- The Department is hereby issuing a 60 day moratorium on the cancellation/non-renewal of insurance policies for the non-payment of premiums for Arkansans diagnosed with/positively tested for COVID-19. The moratorium applies to all insurance polices issued in this state, but it is not automatic. The affected policyholder must request this extension from their insurance carrier. Insurance carrier are allowed to request evidence of the diagnosis. The 60 day moratorium period is effective starting from March 20, 2020, the date of the issuance of Executive Order 20-03. Insurers are directed to work with affected policyholders in paying the premiums that become due during the moratorium period by either allowing a payment plan or a further extension of the due date for the amount in full.



CALIFORNIA

Issuing Agency: Department of Insurance

Document: [Notice](#) (March 18, 2020)

The Notice applies to all admitted and non-admitted insurance companies that provide any insurance coverage in California including life, health, auto, property, casualty, and other types of insurance and all licensed producers and other interested parties and it requests that:

- All insurance companies provide their insureds with at least a 60 day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during this challenging time due to circumstances beyond the control of the insured.
- All insurance agents, brokers and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make prompt insurance payments. This should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods, in order to protect the safety of workers and customers.

COLORADO

Issuing Agency: Department of Regulatory Agencies, Division of Insurance

Document: [Bulletin No. B-5.38](#) (March 27, 2020)

The Bulletin applies to all insurers that issue and have in effect property and casualty insurance policies in Colorado and insurance producers who collect and remit premiums and offers the following directives and guidance:

- All insurance companies issuing coverage to personal and commercial policyholders to make reasonable accommodations to prevent individuals and businesses from losing coverage due to cancellation for non-payment of premium during this unprecedented time. Reasonable accommodations shall include, but not be limited to:
 - extension of premium grace periods;
 - waiver of late payment fees;
 - a moratorium on cancellations for non-payment;
 - defer any non-renewal underwriting actions; and
 - provide a continuation of coverage for any expiring policy.

These accommodations should be available to the policyholder and clearly explained on the insurer's website, for as long as the Orders are in effect or until the Bulletin is rescinded, whichever is later.

- Insurers shall take steps to encourage the use of electronic payment technology.

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- Insurers should be aware that the Division will request data from the insurers related to the Division's position, including the website address where the information is displayed, and number of accommodations made or rejected by the insurer.

CONNECTICUT

Issuing Agency: Department of Insurance

Document: [Bulletin No. IC-40](#) (March 24, 2020)

The Bulletin applies to all admitted and non-admitted insurance companies that provide any insurance coverage in Connecticut, including life, health, auto, property, casualty and other types of insurance, all licensed producers and other interested parties and it requests that:

- All insurance companies provide their insureds with at least a 60 day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during this challenging time due to circumstances beyond the control of the insured.
- All insurance agents, brokers and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make prompt insurance payments. This should include alternative methods of payment, such as online payments, to eliminate the need for in person payment methods, in order to protect the safety of workers and customers.

DELAWARE

Issuing Agency: Department of Insurance, Domestic and Foreign Insurers

Document: [Bulletin No. 116, Producers and Adjusters Bulletin No. 32](#) (March 20, 2020)

The Bulletin applies to all insurance carriers authorized to transact business in Delaware and all licensed insurance producers and it encourages these carriers to accommodate their policyholders in an efficient and compassionate manner by requesting that:

- All admitted and non-admitted carriers doing business in Delaware suspend cancellations and nonrenewals due to the nonpayment of premium during the Governor's declared State of Emergency.

Policyholders are encouraged to contact their insurance carriers to discuss their options if they are suffering a hardship as a result of the COVID-19 related restrictions.

All producer licensees are advised to take all necessary actions to ensure their ability to promptly service claims and provide other essential services to insureds affected by the COVID-19 crisis.



DISTRICT OF COLUMBIA

Issuing Agency: Department of Insurance, Securities and Banking

Document: [Commissioner's Order -01-2020](#) (March 20, 2020)

The Order applies to all carriers offering health benefit plans in the District and it directs that carriers shall not cancel or non-renew any health benefit plan with the express written consent of the Commissioner.

FLORIDA

Issuing Agency: Office of Insurance Regulation Informational Memoranda

Document: [OIR-20-04M](#) (March 25, 2020)

The Memorandum applies to all insurers and other health entities regulated by OIR and offers general guidance on the treatment of policyholders as part of the state's continuing efforts to protect Floridians. Regulated entities are encouraged, when prudently possible, to be flexible with premium payments in order to avoid a lapse in coverage. Such flexibility can include:

- Relaxing due dates;
- Extending grace or reinstatement periods;
- Waiving late fees and penalties; and
- Allowing payment plans.

Regulated entities are encouraged to only consider cancellation of policies if all possible efforts to work with consumers to continue coverage have been exhausted.

GEORGIA

Issuing Agency: Office of Insurance and Safety Fire Commissioner

Document: [Directive 20-EX-5](#) (March 20, 2020)

The Directive applies to all licensed insurance companies in the State of Georgia and includes an instruction that all health insurers are to refrain from cancelling health policies for the cause of non-payment until further notice.



HAWAII

Issuing Agency: Department of Commerce and Consumer Affairs, Insurance Division

Document: [Memorandum 2020-31](#) (March 27, 2020)

The Memorandum applies to all admitted and non-admitted insurers in the State providing any insurance coverage, including life, health, motor vehicle, property, casualty, and other types of insurance for individuals, groups and businesses and it encourages insurers to be mindful of the difficulties individuals and businesses in the State are experiencing and also encourages insurers to work with their insureds to ensure coverage continues during this time, policies to not lapse, and to consider the following:

- Refrain from cancelling or non-renewing policies due to non-payment during this time of hardship and to grant a grace period for premium payments to be made;
- Work with insureds on a structured payment plan for late premium payments;
- Waive late fees and penalties;
- Continue working with insureds for a period of 60 days after this health emergency has passed, or as long as reasonably practical.

INDIANA

Issuing Agency: Department of Insurance

Document: [Bulletin 252](#) (March 26, 2020)

The Bulletin applies to all insurance companies and it requests that all insurance companies in Indiana institute a moratorium on policy cancellations and non-renewals of any insurance policy in effect for a policyholder in Indiana to allow a grace period for any policyholder in Indiana for a period of 60 days for any premium due from March 19, 2020 to May 18, 2020.

The IDOI requests insurance companies work with the impacted policyholders in paying the premiums that would have become due during the moratorium period by either allowing a payment plan or a further extension in paying the full amount due.

IOWA

Issuing Agency: Insurance Division

Document: [Bulletin 20-04](#) (March 19, 2020)

The Bulletin applies to all health insurance companies writing in the State and it requests that all health insurers and health maintenance organizations licensed in the State allow a premium payment grace period and it also requests that health insurers and health maintenance organizations:



- Put procedures in place to allow those affected by the COVID-19 related economic disruptions to request extensions for premium payments beyond the insurer's normal payment due dates.
- Allow any individual or group policyholder at least 60 days after a premium payment is due before terminating coverage for any such policyholder who has a premium payment initially due between March 17, 2020 and June 30, 2020.

LOUISIANA

Issuing Agency: Department of Insurance, Office of the Commissioner

Document: [Emergency Rule 40](#)

The Rule applies to all insurers and it suspends any notice of cancellation, notice of nonrenewal, nonreinstatement or any other notice for insurance in force and effect as of 12:01 am on March 12, 2020, and any such notice shall be null and void and have no force or effect. Any such notice shall be reissued *de novo* to the insured in accordance with existing statutory requirements after the expiration of Emergency Rule 40.

Insurers may issue a notice of cancellation for non-payment of premium during the pendency of Emergency Rule 40, but in no event may the insurer cancel the insurance policy for non-payment of premium until after the expiration of Emergency Rule 40.

MAINE

Issuing Agency: Department of Professional and Financial Regulation, Bureau of Insurance

Document: [Bulletin 442](#) (March 12, 2020)

The Bulletin was issued in conjunction with the Governor's issuance of a proclamation of an insurance emergency and it provides that carriers must:

- Prioritize consumers' needs;
- Make every effort to expedite claims approvals and payments and other essential customer service functions; and
- Make all reasonable accommodations for late payments and other problems that are beyond the consumer's control.



MARYLAND

Issuing Agency: Insurance Administration

Document: [Bulletin No. 20-10](#) (March 20, 2020)

The Bulletin applies to all life and health carriers and property and casualty insurers and it encourages those carriers and insurers to make reasonable accommodations so that individuals and businesses do not lose coverage due to non-payment of premium during this emergency. Reasonable accommodations may include suspension of premium due, extension of billing due dates and premium grace periods, and waiver of installment and late payment fees.

MASSACHUSETTS

Issuing Agency: Office of Consumer Affairs and Business Regulation, Division of Insurance

Document: [Bulletin 2020-05](#) (March 23, 2020)

The Bulletin applies to all insurance carriers issuing insurance coverage in Massachusetts and self-insurance groups covering employers in Massachusetts and provides information about the Division's expectations regarding steps they are to take to help address concerns about maintaining coverage and preserving the insurance market.

The Division believes that carriers should be looking for all ways to be flexible in collecting premiums and find ways to address what the Division hopes will be a short-term disruption.

All carriers are advised to provide employers and individuals with as much flexibility as is reasonably possible during the period of the COVID-19 health crisis to maintain their existing coverage, despite policyholders' growing concerns about being able to send their premiums in on time. Carriers should:

- Explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance or issuance of coverage.
- Explain grace periods that usually allow distressed policyholders experiencing significant financial hardship to delay payments without coverage being terminated.
- Work with employers or individuals experiencing financial hardship to find the best ways to address concerns with the timing of premium payments in order to delay any cancellation of coverage for non-payment and collection activity.
- Explore all possible ways to relax due dates for premium payments; to extend grace periods; waive late fees, non-sufficient fund fees, installment fees and penalties; allow payment plans for premium payments; assist affected policyholders to find ways that insurance policies do not lapse; and consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage.



MISSISSIPPI

Issuing Agency: Department of Insurance

Document: [Bulletin 2020-3](#), as amended (March 25, 2020)

The Bulletin applies to all policies issued or issued for delivery in this State and includes a 60 day moratorium on the cancellation/non-renewal of policies for the payment of premiums.

Insurers are directed to work with impacted policyholders in paying the premium that become due during the moratorium period by either allowing a payment plan or a further extension of the due date for the amount in full.

MISSOURI

Issuing Agency: Department of Commerce and Insurance, Insurance

Document: [Bulletin 20-05](#) (March 21, 2020)

The Bulletin applies to all insurers conducting the business of insurance in the State and it encourages adherence to the following practices:

- Coverage for residents of the State of Missouri should continue under all insurance policies in effect as of March 13, 2020 and shall remain in effect until such time as Executive Order 20-04 is terminated or this Bulletin is rescinded, whichever is later. Insurers are strongly encouraged not to cancel, nonrenew, or terminate coverage while this bulletin is in effect.

This Bulletin is in effect until May 15, 2020 unless extended by the Director.

MONTANA

Issuing Agency: Office of the Montana State Auditor, Commissions of Securities and Insurance

Document: [Recommendations](#) (March 26, 2020)

The Recommendations apply to all insurance companies across all lines of business and include:

- Flexible payment solutions providing additional time to make payments;
- Allowing grace periods to delay premium payments; and
- Waiving insurance premium late fees.



NEW JERSEY

Issuing Agency: Department of Banking and Insurance, Office of the Commissioner

Document: [Bulletin No. 20-04](#) (March 19, 2020)

The Bulletin applies to all entities licensed or regulated by the Department of Banking and Insurance and encourages those regulated by the Department to assist those affected by the current conditions by taking actions such as:

- Relaxing due dates for premium payments and insurance policy based loan payments;
- Extending grace periods, waving late fees and penalties;
- Allowing forbearance with regard to the cancellation/non-renewal of policies;
- Allowing payment plans for premium payments and exercising judicious efforts to assist affected policyholders and work with them to make sure that their insurance policies do not lapse.

NEW MEXICO

Issuing Agency: Office of Superintendent of Insurance

Document: [Bulletin 2020-006](#) (March 20, 2020)

The Bulletin applies to all admitted and non-admitted insurance companies that provide any insurance coverage in New Mexico, including life, health and other types of insurance for groups and individuals and requests that:

- All insurance companies refrain from cancelling or non-renewing policies of businesses and individuals negatively impacted by the disruption due to the non-payment of premiums during this public health emergency, or at a minimum, provide extended grace periods for payment of premiums. We encourage implementing these practices as soon as possible and consider extending them for a minimum of thirty (30) days after the emergency is declared over.
- All insurance companies work with their insureds after the public health emergency is over to allow the insureds to catch up on past due premiums in installments without loss of coverage.



NEW YORK

Issuing Agency: Governor of New York

Document: [News Release](#) (March 27, 2020)

The Governor also announced that for a 90 day period, consumers experiencing financial hardship due to COVID-19 may defer paying life insurance premiums. No late fees will be assessed and no negative data will be reported to credit bureaus during this time, and late payments will be payable over a one-year period.

NORTH CAROLINA

Issuing Agency: Department of Insurance

Document: [Advisory](#) (March 24, 2020)

The Advisory applies to all insurance companies and all policies and it urges insurers to:

- Relax due dates for premium payments;
- Extend grace periods;
- Waive late fees and penalties;
- Allow payment plans for premium payments to otherwise avoid a lapse in coverage

Insurers should also consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage.

OHIO

Issuing Agency: Department of Insurance

Document: [Bulletin 2020-07](#) (March 30, 2020)

The Bulletin applies to all insurers providing property and casualty, life and long term care insurance policies in the State and notifies these insurers that they must provide their insureds with at least a 60 day grace period to pay insurance premiums or submit information. Specifically, insurers are ordered to:

- Provide their insureds with at least a 60 day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during the state of emergency. This means that insurers should offer payment accommodations, such as allowing consumers to defer payments at no cost, extending payment due dates, or waiving late or reinstatement fees, where consumers are unable to make timely payments of premium or fees due to COVID-19 related disruptions.



- Provide at least a 60 day grace period as to any policy provision that imposes a time limit on an insured or claimant to perform any act, including the submission of information or funds, with respect to a contract for insurance. This means that insurers are to extend such time limits by at least 60 calendar days from the last day allowed under the terms of the contract, or any longer period that may be deemed reasonable under the specific circumstances related to that insured or claimant.

This Bulletin expires upon the expiration of the state of emergency.

OKLAHOMA

Issuing Agency: Department of Insurance

Document: [LH Bulletin No. 2020-02](#) - CORONAVIRUS

The Bulletin applies to all life and health insurance companies and health maintenance organizations and asks these carriers to not cancel the coverage of any person who has been diagnosed with COVID-19 and is unable to return to work or maintain coverage under their current health carrier because of COVID -19 for the next ninety (90) days. Health carriers should extend the traditional thirty (30) day grace period to a sixty (60) day grace period for nonpayment of premiums. Federal rules governing marketplace policies (ACA) will remain in effect with respect to grace periods.

OREGON

Issuing Agency: Department of Consumer and Business Services

Document: [Order](#) (March 25, 2020)

The Order applies to all insurance companies and requires all insurance companies to extend grace periods for premium payments, postpone policy cancellations and nonrenewals and extend deadlines for reporting claims. Insurance companies must take steps immediately to do the following until this Order is no longer in effect:

- Institute a grace period for premium payments on all insurance policies issued in the state;
- Suspend all cancellations and nonrenewals for active insurance policies;
- Extend all deadlines for consumers to report claims and communicate about claims;
- Provide consumers the ability to make premium payments and report claims while maintaining safe social distancing standards.

The order is effective immediately, and will be in force through at least April 23. If necessary, the department may extend the duration of this temporary order.



PENNSYLVANIA

Issuing Agency: Department of Insurance

Document: [Notice](#) (March 19, 2020)

The Notice applies to all licensed insurance companies and it encourages the entities and individuals regulated by the Department of Insurance to assist those affected by the current situation. Insurers should consider the following actions:

- Relaxing due dates for premium payments;
- Extending grace periods;
- Waiving late fees and penalties;
- Allowing payment plans for premium payments to otherwise avoid a lapse in coverage

Insurers should consider cancellation or nonrenewal of policies only after exhausting other efforts to work with policyholders to continue coverage.

RHODE ISLAND

Issuing Agency: Department of Business Regulation, Insurance Division

Document: [Bulletin No. 2020-4](#) (March 25, 2020)

The Bulletin applies to all insurers writing business in the State and it requests they take the following steps to preserve access to insurance coverage during this emergency:

- Provide as much flexibility as possible to allow insureds to maintain their existing coverage by implementing and extending grace periods for premium payments, allowing payment plans for premium payments and instituting whatever other measures necessary to assist insureds in avoiding or delaying cancellation or a lapse of insurance coverage.
- Institute alternative methods of payment for those insureds whose normal method of payment is affected by this emergency.
- Institute additional flexibility in the form of waivers of late, insufficient funds and installment fees and penalties, extension of billing due dates and premium grace periods.

SOUTH CAROLINA

Issuing Agency: Department of Insurance

Document: [Bulletin No. 2020-02](#) (March 25, 2020)

The Bulletin applies to all insurers and provides the expectations that all insurers are to work with its impacted citizens to provide relief from certain insurance requirements:

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- Extension of premium payments and deadlines
- Additional time before non-renewals or cancellations become effective
- Waiver of fees, penalties or other charges relating to an insured's temporary inability to submit premium payments or otherwise respond as a result of this pandemic.

TENNESSEE

Issuing Agency: Department of Commerce and Insurance

Document: [Bulletin 20-03](#) (March 24, 2020)

The Bulletin applies to all carriers writing insurance coverage in Tennessee and it requests that they provide employers and individuals with as much flexibility as practicable during the period of the COVID-19 public health crisis. Carriers should work with policyholders who have concerns about their ability to timely pay premium to ensure that policyholders can maintain their existing insurance coverage. Carriers across all lines of business should explain the options to maintain continuous coverage during this difficult time. Carriers should explain existing applicable grace periods that may allow policyholders to delay premium payments without losing coverage. Carriers should explore ways to eliminate late fees, non-sufficient fund fees, and installment fees. Carriers should also work with employers or individuals to find the best ways to address concerns with the timing of premium payments in order to delay any cancellation of coverage for non-payment and collection activity.

TEXAS

Issuing Agency: Department of Insurance

Document: [Commissioner's Bulletin No. B-007-20](#) (March 23, 2020)

The Bulletin applies to all insurers licensed to write life and accident and health insurance. Governor Greg Abbott suspended certain claim-handling deadlines imposed by law on March 20, 2020. The Commissioner of Insurance also declared the COVID-19 pandemic an insurance disaster. Taken together, these actions have the effect of expanding claim-handling deadlines imposed by the State's prompt payment laws for an additional 15 days to help carriers respond to the COVID-19 outbreak.

The Commissioner expects all carriers to work with policyholders who experience financial hardships and encourages carriers to use grace periods for payments, temporary suspension of premium payments, payment plans and other actions to allow continuing insurance coverage.



VIRGINIA

Issuing Agency: State Corporation Commission, Bureau of Insurance

Document: [Notice](#) (March 27, 2020)

The Notice applies to all insurers licensed to write life and accident and health insurance and it strongly encourages insurers to be flexible and take into consideration the hardships and constraints many individuals and businesses are experiencing. Insurers should consider:

- Relaxing due dates for premium payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premium payments to otherwise avoid a lapse in coverage.
- Cancellation or non-renewal of policies only after exhausting all other reasonable efforts to work with policyholders to continue coverage.

WEST VIRGINIA

Issuing Agency: Department of Insurance, Proclamation of State Emergency

Document: [Emergency Proceeding: 20-EO-02](#) (March 18, 2020)

The Order requires that insurers and other regulated entities must not issue a cancellation notice or nonrenewal notice pertaining to any insurance policy, plan or contract if the reason for cancellation or nonrenewal is a result of circumstances stemming from the COVID-19 pandemic and the corresponding State of Emergency, Executive Order 2-20, any subsequent executive orders or other governmental actions. Insurers and other regulated entities should be flexible with respect to allowing alternative payment arrangements for the satisfaction of premiums that are due or that which may become delinquent as a result of the emergency.

This Emergency Order shall remain in full force and effect until further notice and that it may be extended, amended, modified, altered or rescinded, as to all or any portion hereof, via subsequent order.

WISCONSIN

Issuing Agency: Department of Insurance

Document: [Bulletin](#) (March 20, 2020)

The Bulletin applies to all insurers and provides guidance regarding compliance with regulatory requirements. Insurers are encouraged to offer flexibility to insureds who are incurring economic hardship. The flexibility can include offering non-cancellation periods, deferred premium payments, premium holidays and acceleration or waiver of underwriting requirements.



Chittenden, Murday & Novotny LLC will continue to monitor developments on this issue and update its clients accordingly.

For more information, please contact:

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If you have any questions about this Client Bulletin, please feel free to contact any of the attorneys listed or the CMN attorney with whom you regularly work.

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