



DEPARTMENT OF
INSURANCE AND FINANCIAL INSTITUTIONS

REPORT OF MARKET CONDUCT EXAMINATION

OF

**MUTUAL OF ENUMCLAW INSURANCE COMPANY,
NAIC CoCode 14761**

AS OF

December 31, 2022

AZ Exam No. 60537

NAIC MATS No. AZ-JESSENK-6

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MARKET CONDUCT SECTION

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Katie M. Hobbs, Governor

Barbara D. Richardson, Director

Director Barbara D. Richardson
Arizona Department of Insurance and Financial Institutions
100 N. 15th Ave, Suite 261
Phoenix, Arizona 85007-2624

Dear Director Richardson:

Pursuant to your instructions and in conformity with the provisions of the Insurance Laws and Rules of the State of Arizona, an examination has been made of the market conduct affairs of the:

Mutual of Enumclaw Insurance Company, NAIC CoCode 14761

Shelly Schuman, ACS, AIE, AMCM, CICSR, CIS, FLMI, HIA, PAHM, Market Regulation Director, conducted the examination with the assistance of Bruce Glaser, CIE, MCM, AIRC, CPCU, CLU, ChFC, FLMI, ARM-Pe, CICSR, CRIS, FAHM, PHIAS, Market Conduct Senior Examiner, and Tony Taylor, DM, MCM, PMP, CSM, SA, Data Regulation Manager.

The examination covered January 1, 2019, through December 31, 2022.

As a result of that examination, the following Report of Examination is respectfully submitted.

Sincerely yours,

Maria G. Ailor, AIE, AMCM, Assistant Director
Market Regulation and Consumer Services Division

AFFIDAVIT

STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

Shelly Schuman, ACS, AIE, AMCM, CICS, CIS, FLMI, HIA, PAHM, being first duly sworn, states that I am a duly appointed Market Regulation Director for the Arizona Department of Insurance and Financial Institutions. Under my direction and with my participation and the participation of Bruce Glaser, CIE, MCM, AIRC, CPCU, CLU, ChFC, FLMI, ARM-Pe, CICS, CRIS, FAHM, PHIAS Market Conduct Examiner-in-Charge, and Tony Taylor, DM, MCM, Market Conduct Data Management Specialist, the Examination of Mutual of Enumclaw Insurance Company, hereinafter referred to as the "Company," was performed at the request of the Arizona Department of Insurance and Financial Institutions. The information contained in this Report, which consists of the following pages, is true and correct to the best of my knowledge and belief, and any conclusions and recommendations contained in and made a part of this Report are such as may be reasonably warranted from the facts disclosed in the Examination Report.

Shelly Schuman

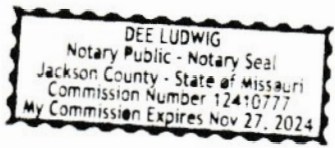
Shelly Schuman, ACS, AIE, AMCM, CICS, CIS, FLMI, HIA, PAHM,
Market Regulation Director
The INS Companies

Subscribed and sworn to before me this 26th day of July 2024,
2024.

Dee Ludwig

Notary Public

My Commission Expires: 11-27-2024



FOREWARD

This market conduct examination report of Mutual of Enumclaw Insurance Company (herein referred to as the “Company”) was prepared by employees of the Arizona Department of Insurance and Financial Institutions (“Department” and “DIFI”) as well as independent examiners contracting with the Department. A market conduct examination reviews certain business practices of insurers licensed to conduct insurance business in Arizona. The examiners reviewed the Company in accordance with Arizona Revised Statutes (A.R.S.) §§ 20-142, 20-156, and 20-157. The findings in this report, including all work products developed in the production of this report, are the sole property of the Department.

The examination reviewed private passenger automobile and homeowner business operations related to underwriting and rating.

Certain unacceptable or non-complying practices may not have been discovered during this examination. Additionally, findings may not be material to all areas that would serve to assist the Director.

Failure to identify or criticize specific Company practices does not constitute acceptance of those practices by the Department.

SCOPE AND METHODOLOGY

The Company’s examination was conducted in accordance with the standards and procedures established by the National Association of Insurance Commissioners (NAIC) and the Department. The purpose of the examination was to determine the Company’s compliance with Arizona's insurance laws.

The focus of the examination was the Company’s compliance with A.R.S. § 20-2110(F)(3) and the use of bankruptcies as a rating factor. The Company was requested to self-audit their credit scoring models for all property and casualty products sold in Arizona from January 1, 2019, to December 31, 2022. The purpose of the self-audit was to determine if consumers were rated and paid higher premiums due to a bankruptcy aged to more than seven years, in violation of

A.R.S. § 20-2110(F)(3). If violations were found as part of the self-audit, the Company would be required to submit a Corrective Action Plan to remediate those violations.

In accordance with Department procedures, the examiners completed a preliminary finding ("Finding") form on those policies that were not facially compliant with Arizona law. The Finding forms were submitted for review and comment to the designated Company representative. For each finding, the Company was requested to agree, disagree, or otherwise justify the Company's noted action.

HISTORY OF THE COMPANY

(Provided by the Company in Part)

In 1898, a group of residents of the small town of Enumclaw, Washington, joined together and founded the Farmers' Mutual Insurance Company. The Company focused on serving farms throughout Washington State until the late 1940s when it began offering insurance for families.

The Company expanded into Oregon and Idaho in 1952 and began offering commercial insurance for businesses in Oregon, Idaho, and Washington in 1963.

The Company's name was changed to Mutual of Enumclaw Insurance Company on May 1, 1966. It expanded to Utah in 2002 and Arizona in 2014.

In April 2015, the Oregon Department of Consumer and Business Services – Insurance Division issued its Findings and Order approving the Company's reorganization into a mutual holding company structure. Reincorporating into Oregon domestic insurers, forming a mutual holding company (Mutual of Enumclaw Insurance Holding Company), converting Mutual of Enumclaw Insurance Company into an incorporated Oregon stock insurer, with its name remaining "Mutual of Enumclaw Insurance Company," and having Mutual of Enumclaw Insurance Company and Enumclaw Property and Casualty Company each become wholly owned or indirect subsidiaries of Mutual of Enumclaw Insurance Holding Company.

In January 2018, it expanded to Montana and, in 2020, to Wyoming.

The Company markets insurance products for homes, autos, businesses, and farms through local independent insurance agents in Washington, Oregon, Idaho, Utah, Arizona, Montana, and Wyoming.

The Company's Board of Directors as of December, 2023:

- Kerry Barnett Chair, Retired Executive and Former Director, Insurance Commissioner, and Superintendent of Banking at the Oregon Department of Consumer and Business Services.
- Anthony L. Baruffi, CFA Director, Vice President, Garde Capital
- Elizabeth Hunter, Director, Technology Executive

- Shane Kim, Director, Retired Executive
- Laurinda Mackenzie, Director, Retired Executive
- Eric P. Nelson, CPCU, ARP Director, President & CEO, Mutual of Enumclaw
- Eileen O'Neill Odum, Director, Retired Executive
- Don E. Powell, Director, Attorney at Law, Powell & Gunter

The management team for the company includes:

- Eric P. Nelson, CPCU, ARP President & CEO
- Andrew Chen, CPA, MBA CFO & VP, Financial Services
- Richard Crosley CIO & VP, Information Technology
- Jeff Gardner, VP, Marketing & Sales
- Celeste Holmes, GCA VP, Claims
- Athan Shinas VP, Chief Legal Officer & Corporate Secretary
- Tom Taylor, CIA, MBA Chief Risk Officer
- Jerel Titus, VP, Chief Underwriting Officer
- Sandy Williams, SPHR, SHRM-SCP VP, Chief Administrative Officer

EXAMINATION REPORT SUMMARY

The Director may examine and investigate the affairs of every insurance institution or insurance producer doing business in this state to determine whether the insurance institution or insurance producer has been or is engaged in any conduct in violation of this chapter, pursuant to A.R.S. §§ 20-142, 20-156, 20-157, 20-158, and 20-159 in addition to § 20-2114.

The examination concluded Mutual of Enumclaw Insurance Company's responses during the examination demonstrated noncompliance with A.R.S. § 20-2110(F).

Private Passenger Automobile

- New Business Policies: There were no findings related to the examination.

- Renewal Policies: There were 24 different insureds affecting 49 renewal periods, where the bankruptcy was aged to more than 7 years old as of the policy's renewal date, and constitutes a violation A.R.S. § 20-2110(F)(3).

Homeowner

- New Business Policies: There were no findings related to the examination.
- Renewal Policies: There were 26 different insureds affecting 53 renewal periods, where the bankruptcy date was aged to more than 7 years old as of the policy's renewal date, and constitutes a violation of A.R.S. § 20-2110(F)(3).

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CORRECTIVE ACTION PLAN

This Corrective Action Plan defines the corrective action requirements applicable to Mutual of Enumclaw Insurance Company (Company) resulting from the market conduct examination conducted by the Department.

Subsequent Event

Prior to the conclusion of this examination, the Company notified the Department that only 3 policyholders identified as having been rated for a bankruptcy during the examination period currently have active policies with the Company. The remaining 47 policyholders' policies were canceled prior to this examination's conclusion.

Area of Concern: Bankruptcy Factor Rating of Policies

Corrective Actions

1. As of March 30, 2024, and prior to the conclusion of this examination, the Company began ordering a credit-based insurance score for PPA and HO policies at every renewal term.
 - a. No later than sixty days after the filing of this report, the Company will file in SERFF all applicable changes to its rate/rule filings to reflect the change that the re-ordering of credit-based insurance scores will occur at every renewal term. If this change has already been filed in SERFF, please provide the SERFF filing number to the Department.
2. No later than sixty days after the filing of this Report, the Company will remediate the **3¹ active HO renewal business** policyholders whose premium was adversely impacted by the inclusion of an aged-out bankruptcy as follows:
 - a. Rated improperly at 1 renewal – \$50;
 - b. Rated improperly at 2 renewals – \$75;
 - c. Rated improperly at 3 renewals – \$100; and
 - d. Rated improperly at 4 or more renewals – \$125.
3. No later than sixty days after the filing of this Report, the Company will remediate the **23² inactive HO renewal business** policyholders whose premium was adversely impacted by the inclusion of an aged-out bankruptcy as follows:
 - a. Rated improperly at 1 renewal – \$50;

¹ These policyholders are identified in Final Finding 04.

² These policyholders are identified in Final Finding 04.

- b. Rated improperly at 2 renewals – \$75;
 - c. Rated improperly at 3 renewals – \$100; and
 - d. Rated improperly at 4 or more renewals – \$125.
4. No later than sixty days after the filing of this Report, the Company will remediate the **24**³ **inactive PPA renewal business** policyholders whose premium was adversely impacted by the inclusion of an aged-out bankruptcy as follows:
 - a. Rated improperly at 1 renewal – \$50;
 - b. Rated improperly at 2 renewals – \$75;
 - c. Rated improperly at 3 renewals – \$100; and
 - d. Rated improperly at 4 or more renewals – \$125.
5. No later than ninety days after the filing of this Report, the Company will provide a data set to the Department that at minimum will include:
 - a. The date and refund amount for each policyholder identified in items 2 through 4 above;
 - b. Whether the policyholder is active or inactive;
 - c. The type of refund issued (i.e. check, premium credit, etc.); and
 - d. The Department will provide the format of the data set during the compliance monitoring phase.
6. The Company will pay a civil monetary penalty negotiated separately in the forthcoming consent order.
7. The Company will provide the Department with a specific timeline for the implementation of the above process.
8. The Company will provide status updates to the Department every thirty (30) days, on an as needed basis, or at the Department’s request, during the implementation and compliance monitoring period.
 - a. During the course of the implementation and compliance period, the Department may request additional documentation and/or supporting materials not specifically listed herein that demonstrate the Company’s progress with the CAP requirements above.

³ These policyholders are identified in Final Finding 02.

FINDINGS

UNDERWRITING AND RATING

Private Passenger Automobile (PPA) - New Business

The Company provided a list of 5,221 new business PPA policies active during the examination period. The Company was initially unable to provide the policyholder bankruptcy date information to the Department for the examination period. After discussions with the Department, the Company instead provided the Credit-Based Insurance Score (CBIS) reason codes as a means to identify policyholders that may have been rated for having one or more bankruptcies by reviewing four specific CBIS reason codes. The CBIS code relevant for evaluating the Company's compliance with A.R.S. § 20-2110(F) is titled "Reason Code 00131 – Account with a Reported Delinquency Status Including Bad Debt & Bankruptcy" (Reason Code 00131). The examiners utilized Reason Code 00131 as a filter to determine the number of policyholders that may have been rated for one or more bankruptcies during the examination period. There were a total of 39 new business PPA policies identified with Reason Code 00131.

The Company provided an additional response demonstrating that after reviewing the public records for the 39 identified policies, 30 policies did not have a confirmed bankruptcy record. The Company's response confirmed that the remaining 9 new business policies included a bankruptcy record. The examiners then compared the bankruptcy date, the date the CBIS was calculated, and the policy's inception date to identify whether the bankruptcy was aged to more than 84 months old. Of these 9 policies, there were 3 policies that had a bankruptcy aged to more than 84 months old at the inception date and were not considered as a rating factor in the Company's model, 4 policies had a bankruptcy that was less than 84 months old at the inception date, and 2 policies had a bankruptcy dated after the CBIS was ordered.

After review of the Company's response and supporting documentation, the examiners concluded that none of the 9 identified new business PPA policies utilized a bankruptcy in violation of A.R.S. § 20-2110(F) during the examination period. These 9 policies were withdrawn. Accordingly, there are no findings of A.R.S. § 20-2110(F) violations related to new business PPA policies for this examination.

The following Underwriting and Rating Standard Passed:

#	Standard	Regulatory Authority
AZ2	F. An insurer shall not use the following types of credit history to calculate an insurance score to determine property or casualty premiums for insurance transactions that are subject to this article and shall not knowingly use an insurance score developed by a third party if the score is calculated using any of the following types of credit history: 3. A bankruptcy or a lien satisfaction that is more than seven years old.	A.R.S. § 20-2110(F)(3) <i>See also</i> A.R.S. §§ 20-142, 20-156, 20-157, 20-158, 20-159, and 20-2114

Private Passenger Automobile – Renewal Business

The Company provided a list of 30,868 renewed private passenger automobile policies active during the examination period. The Company was initially unable to provide the policyholder bankruptcy date information to the Department for the examination period. After discussions with the Department, the Company instead provided the CBIS reason codes as a means to identify policyholders that may have been rated for having one or more bankruptcies by reviewing four specific CBIS reason codes. As previously noted, the relevant CBIS reason code for evaluating the Company’s compliance with A.R.S. § 20-2110(F) is Reason Code 00131. The examiners utilized Reason Code 00131 as a filter to determine the number of policyholders that may have been rated for one or more bankruptcies during the examination period. There were a total of 1,454 PPA renewal business policies identified with Reason Code 00131.

After reviewing the 1,454 PPA policies, the Company provided an additional response that of the 1,454 policies, 785 had no bankruptcy record, and 369 were inactive during the identified policy term. These 1,154 items were removed from the population, and 300 remained as the review of public records for these policies included a bankruptcy.

The examiners issued a Preliminary Finding for the remaining 300 items. In its response to the Preliminary Finding, the Company agreed with 49 violations, and disagreed with the remaining 251 policy renewals.

In support of its assertion that the remaining 251 policy renewals did not utilize a bankruptcy in violation of A.R.S. 20-2110(F)(3), the Company provided the following supporting documentation. For 100 of the remaining renewal periods, the data showed that the bankruptcy was greater than 84 months at the inception date; however, based on a demonstration of the Company's model in use during the examination period, the model properly excluded the bankruptcy from the calculation of the CBIS, and thus did not utilize the bankruptcy as a rating factor. These 100 policy renewals were withdrawn.

For the remaining 151 policy renewals, the examiners then compared the bankruptcy date, the date the CBIS was calculated, the policy's inception date, and subsequent renewal periods to identify whether the bankruptcy aged to more than 84 months old during the examination period. Of these 151 renewals, 75 included a bankruptcy that was less than 84 months at each effective date, and the remaining 76 renewals had a bankruptcy occur after the CBIS was ordered and thus the subsequent renewals examined here complied with A.R.S. § 20-2110(F). These 151 renewal periods were withdrawn. Following review of the additional information submitted by the Company, there were 49 renewal periods, with an error rate of 16 percent, in which a bankruptcy was aged to more than 7 years.

Accordingly, there were 49 substantiated violations of A.R.S. § 20-2110(F)(3) related to this finding.

The following Underwriting and Rating Standard Failed:

#	Standard	Regulatory Authority
AZ2	F. An insurer shall not use the following types of credit history to calculate an insurance score to determine property or casualty premiums for insurance transactions that are subject to this article and shall not knowingly use an insurance score developed by a third party if the score is calculated using any of the following types of credit history: 3. A bankruptcy or a lien satisfaction that is more than seven years old.	A.R.S. § 20-2110(F)(3) <i>See also</i> A.R.S. §§ 20-142, 20-156, 20-157, 20-158, 20-159, and 20-2114

Finding #1 – Bankruptcy Rating of Private Passenger Automobile Renewal Business

There were 24 different insureds, affecting 49 renewal periods, with an error rate of 16 percent, in which a bankruptcy was aged to more than 7 years.

Because A.R.S. § 20-2110(F) prohibits the use of bankruptcies that are aged more than 7 years, and this timeline begins on the date that the bankruptcy is adjudicated, the Company's responses during the course of the examination demonstrated noncompliance with A.R.S. § 20-2110(F) which resulted in 49 violations in connection with this finding.

Recommendation #1 for Private Passenger Automobile Renewal Business

Mutual of Enumclaw Insurance Company should implement the Corrective Action Plan as detailed in the Examination Report Summary.

Homeowner (HO) – New Business

The Company provided a list of 38,253 new business HO policies active during the examination period. The Company was initially unable to provide the policyholder bankruptcy date information to the Department for the examination period. After discussions with the Department, the Company instead provided the CBIS reason codes as a means to identify policyholders that may have been rated for having one or more bankruptcies by reviewing four specific CBIS reason codes. As previously noted, the relevant CBIS reason code for evaluating the Company's compliance with A.R.S. § 20-2110(F) is Reason Code 00131. The examiners utilized Reason Code 00131 as a filter to determine the number of policyholders that may have been rated for one or more bankruptcies during the examination period. There were a total of 88 new business HO policies identified with Reason Code 00131.

The Company provided an additional response demonstrating that after reviewing the public records for the 88 identified policies, 67 policies did not have a confirmed bankruptcy record. The Company provided an additional response demonstrating that after reviewing the public records for the 21 new business policies included a bankruptcy record. The examiners then compared the bankruptcy date, the date the CBIS was calculated, and the policy's inception date to identify whether the bankruptcy was aged to more than 84 months old. Of the 21 remaining

policies, there were 16 policies that had a bankruptcy aged to more than 84 months at the inception date and were not considered as a rating factor in the Company’s model, 4 policies in which the bankruptcy was less than 84 months at the inception date, and 1 policy had a bankruptcy dated after the CBIS was ordered.

After review of the Company’s response and supporting documentation, the examiners concluded that none of the 21 new business HO policies utilized a bankruptcy in violation of A.R.S. § 20-2110(F) during the examination period. These 21 policies were withdrawn. Accordingly, there are no findings of A.R.S. § 20-2110(F) violations related to new business HO policies for this examination.

The following Underwriting and Rating Standard Passed:

#	Standard	Regulatory Authority
AZ2	F. An insurer shall not use the following types of credit history to calculate an insurance score to determine property or casualty premiums for insurance transactions that are subject to this article and shall not knowingly use an insurance score developed by a third party if the score is calculated using any of the following types of credit history: 3. A bankruptcy or a lien satisfaction that is more than seven years old.	A.R.S. § 20-2110(F)(3) <i>See also</i> A.R.S. §§ 20-142, 20-156, 20-157, 20-158, 20-159, and 20-2114

Homeowner – Renewal Business

The Company provided a list of 38,253 new business and renewed homeowner policies active during the examination period. The Company was initially unable to provide the policyholder bankruptcy date information to the Department for the examination period. After discussions with the Department, the Company instead provided the CBIS reason codes as a means to identify policyholders that may have been rated for having one or more bankruptcies by reviewing four specific CBIS reason codes. As previously noted, the relevant CBIS reason code for evaluating the Company’s compliance with A.R.S. § 20-2110(F) is Reason Code 00131, which included bankruptcy. The examiners utilized Reason Code 00131 as a filter to determine the

number of policyholders that may have been rated for one or more bankruptcies during the examination period. There were a total of 1,036 renewal business HO policies identified with Reason Code 00131.

After reviewing the 1,036 HO renewal policies, the Company provided an additional response that of the identified policies, 601 had no bankruptcy record. There were 191 noted as being inactive during the identified policy term, and were therefore included in error. These 792 policies were removed from the population, and 244 remained as the review of public records for these policies included a bankruptcy.

The examiners issued a Preliminary Finding for the remaining 244 items. In its response to the Preliminary Finding, the Company agreed with 53 violations, and disagreed with the remaining 191 policies.

In support of its assertion that the remaining 191 policies did not utilize a bankruptcy in violation of A.R.S. 20-2110(F)(3), the Company provided the following supporting documentation. For 74 of the remaining policies, the data showed that the bankruptcy was greater than 84 months at the inception date; however, based on a demonstration of the Company's model in use during the examination period, the model properly excluded the bankruptcy from the calculation of the CBIS, and thus did not utilize the bankruptcy as a rating factor. These 74 policies were withdrawn.

For the remaining 117 policies, the examiners then compared the bankruptcy date, the date the CBIS was calculated, the policy's inception date, and subsequent renewal periods to identify whether the bankruptcy aged to more than 84 months old during the examination period. Of these 117 policies, 58 included a bankruptcy that was less than 84 months at each effective date, and the remaining 59 policies had a bankruptcy occur after the CBIS was ordered and thus the subsequent renewals examined here complied with A.R.S. § 20-2110(F). These 117 policies were withdrawn. Following review of the additional information submitted by the Company, there were 53 renewal periods, with an error rate of 22 percent, in which a bankruptcy aged to more than 7 years was aged to more than 7 years.

Accordingly, there were 53 substantiated violations of A.R.S. § 20-2110(F)(3) related to this finding.

The following Underwriting and Rating Standard Failed:

#	Standard	Regulatory Authority
AZ2	F. An insurer shall not use the following types of credit history to calculate an insurance score to determine property or casualty premiums for insurance transactions that are subject to this article and shall not knowingly use an insurance score developed by a third party if the score is calculated using any of the following types of credit history: 3. A bankruptcy or a lien satisfaction that is more than seven years old.	A.R.S. § 20-2110(F)(3) <i>See also</i> A.R.S. §§ 20-142, 20-156, 20-157, 20-158, 20-159, and 20-2114

Finding #2 – Bankruptcy Rating of Homeowner Renewal Business

There were 26 different insureds, affecting 53 renewal periods, with an error rate of 22 percent, in which the bankruptcy date was aged to more than 7 years.

Because A.R.S. § 20-2110(F) prohibits the use of bankruptcies that are aged more than 7 years, and this timeline begins on the date that the bankruptcy is adjudicated, the Company's responses during the course of the examination demonstrated noncompliance with A.R.S. § 20-2110(F) which resulted in 49 violations in connection with this finding.

Recommendation #2 for Homeowner – Renewal Business

Mutual of Enumclaw Insurance Company should implement the Corrective Action Plan as detailed in the Examination Report Summary.

SUMMARY OF STANDARDS

#	Standard	Regulatory Authority	Pass	Fail
CH20F 2	Disclosures to insureds concerning rates and coverage are accurate and timely.	A.R.S. §§ 20-259.01, 20-262, 20-263, 20-264, 20-266, 20-267, 20-2110	X	
CH20F 4	The Company's underwriting practices are not unfairly discriminatory. The Company adheres to applicable statutes, rules, and regulations in its application of mass marketing plans.	A.R.S. § 20-448	X	
CH21F 2	Schedule rating or individual risk premium modification plans, where permitted, are based on objective criteria with usage supported by appropriate documentation.	A.R.S. § 20-448	X	
AZ1	All mandated disclosures are documented and in accordance with applicable statutes, rules, and regulations, including, but not limited to, the Notice of Insurance Information Practices and the Authorization for Release of Information.	A.R.S. §§ 20-2104, 20-2106, 20-2110 and 20-2113	X	
AZ2	F. An insurer shall not use the following types of credit history to calculate an insurance score to determine property or casualty premiums for insurance transactions that are subject to this article and shall not knowingly use an insurance score developed by a third party if the score is calculated using any of the following types of credit history: 3. A bankruptcy or a lien satisfaction that is more than seven years old.	A.R.S. § 20-2110(F)(3) <i>See also</i> A.R.S. §§ 20-142, 20-156, 20-157, 20-158, 20-159, and 20-2114		X