

Market Conduct Exam Guidelines (D) Working Group Comment

Based on the discussion on the Working Group's March 30<sup>th</sup>, Rhode Island wanted to write a note in support of including the National Producer Number in the Title Insurance Form standardized data request (SDR).

We support the inclusion of the NPN in the SDR. While the SDR doesn't use the NPN field for their licensed title producers, it's simple enough to drop off the data request, since these fields aren't required. But since other states use the NPN field, we think it should be included.

In Rhode Island, every title producer is licensed with the Department and Division of Insurance and Chief of Consumer and Licensing Services also noted that while NPN usage might not be universal, it is possible that the commenter we heard in the working group was unaware of the use of the NPN in his state, because some states (including Rhode Island) also issue a state license. But the NPN provides a unique identifier across multiple states and allows states to best utilize the Producer Database (PDB), which is a valuable tool in identifying producers information related to their activities in other states. The NPN is also a helpful tool in differentiating producers with similar and even identical names to avoid departments from licensing confusion.

Best,  
-Matt

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