



OFFICE OF THE
INSURANCE COMMISSIONER
REGULATORY INVESTIGATIONS UNIT

Data Partnership Group, LP
1600 Parkwood Circle, Suite 200
Atlanta, GA
30339



OIC Case#: 1613503

Dear Data Partnership Group, LP,

The Office of the Insurance Commissioner has opened an investigation against Acute Care Triage ("ACT") and Data Partnership Group, LP ("DPG"), for allegedly offering fraudulent ERISA minimum essential coverage ("MEG") health benefit products, including Panthera HSP3, HSP6, HSP, and CAT-50, as employee welfare benefit plans. If proven to be true, these are unauthorized insurance products and the entities are in violation of RCW 48.05.030. OIC is asserting jurisdiction over these health benefit arrangements in accordance with RCW 48.42.010-040.

I have been assigned to investigate this matter. As part of the investigative process, I am requesting that you provide this office with a written response to the allegation. Specifically, please address the following issues:

1. Please describe who, or what DPG is, and the nature of the relationship with ACT, as well DPG's relationship with the Washington State consumer.
2. Please describe what the DPG plan is, which is described on the Panthera HSP3, HSP6, HSP, and CAT-50 health benefit products advertised for sale by ACT on their website.
3. Please describe who the participants of the DPG plan are.
4. Please describe how the participants of the plan sign up, or enroll in that plan, and include a full description of any fees the participants pay to either DPG, or ACT for enrolling in the plan.
5. Does DPG believe it falls into either of these categories to offer its health benefit plans; (1) a single employer group, (2), a *bona fide* group or association of member employers, or (3) an employee organization? Please provide a legal justification for your answer.
6. Please give the specific date for when DPG partnered with ACT to offer the potentially unauthorized insurance, or health benefit products known as Panthera HSP3, HSP6, HSP, and CAT-50, to Washington State consumers.
7. Please give the exact number of the potentially unauthorized insurance, or health benefit products known as Panthera HSP3, HSP6, HSP, and CAT-50, that DPG has sold to, or collected money in partnership with ACT from Washington State consumers since it began to sell the potentially unauthorized insurance, or health benefit products in this state.

8. Does DPG offer other insurance, or health benefit plans that are not listed in this letter? And if so please give a list of what they are, and how long they have been offered in Washington.

Also, please provide this office with copies of the following documents:

1. An Excel list of names and contact information for all Washington State Consumers who are DPG plan participants.
2. Any applications, or contracts that the DPG plan participants agree to or sign in order to become DPG plan participants.
3. Any documents that describe how the DPG plan is advertised and sold to WA State Consumers, including training or advertising materials.
4. An Excel list of names, and contact information for all Washington State Consumers who have purchased the Panthera HSP3, HSP6, HSP, and CAT-50 through DPG.
5. An Excel list of all producer agencies and individuals who sell your insurance, or health benefit plans in WA State.
6. An Excel spreadsheet of other insurance, or health benefit products not listed in this letter, which DPG may be offering to WA consumers if any exist. The spreadsheet should contain name of products, how long the product has been offered in WA, total amount collected and a broken down explanation of what the products are.

Please provide your written response and copies of the above listed documents by 03/06/2020.

How to submit: Please provide the above information via email at wesd@oic.wa.gov (multiple emails are acceptable for size restrictions)

WAC 284-30-650 and RCW 48.17.475 require insurers, health care service contractors, health maintenance organizations, insurance producers, title insurance agents, adjusters, and other individuals licensed by the OIC to promptly respond to an inquiry by the OIC within 15 business days.

Documents provided in response to this request are only automatically exempt from public disclosure if OIC requests them in the context of a market conduct action (RCW 48.37), or a producer's termination for cause (RCW 48.17.595).

We appreciate your cooperation in this matter. I may be reached directly at (360) 725-7060 for further information.

Sincerely,

A handwritten signature in black ink, appearing to be 'LID' with a long horizontal stroke extending to the right.

Legal Affairs Division

File



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INSURANCE COMMISSIONER

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