



# BIENNIAL REPORT

Jon Godfread  
Commissioner

2023-2025

# GREETINGS



Insurance Commissioner  
**Jon Godfread**

## **My fellow North Dakotans,**

Over the past two years, the Insurance Department has continued working to protect consumers, keep our insurance market strong, and make sure promises made by insurers are kept. One big change this biennium was welcoming the State Fire Marshal's Office into the Department. This move strengthens our efforts around public safety and risk prevention—and just makes sense.

We've also stayed focused on making coverage more affordable, cracking down on bad actors in the Medicare space, and keeping a close eye on insurer solvency. I'm proud of the work our team has done and grateful for their commitment to serving North Dakota.

This report gives an overview of the state of insurance in North Dakota from July 1, 2023, to June 30, 2025. I am submitting this report pursuant to N.D.C.C. §§ 26.1-01-03(7) and 54-06-04(c).

*Yours,*



Jon Godfread

## ***Past Insurance Commissioners***

Carey, A. L. 1889–1892  
Cudhie, James 1893–1894  
Francher, Fred 1895–1898  
Harrison, George W. 1899–1900  
Leutz, Ferdinand 1901–1904  
Cooper, E. C. 1905–1910  
Taylor, W. C. 1911–1916  
Olsness, S. A. 1917–1934  
Hopton, Harold 1935–1936  
Erickson, Oscar E. 1937–1945  
Krueger, Otto 1945–1950

Jensen, A. J. 1951–1962  
Albers, Frank 1963–1964  
Nygaard, K. O. 1965–1968  
Wigen, J. O. 1969–1976  
Knutson, Byron 1977–1980  
Wigen, J. O. 1981–1984  
Pomeroy, Earl R. 1985–1992  
Pomeroy, Glenn 1993–2000  
Poolman, Jim 2001–2007  
Hamm, Adam 2007–2016  
Godfread, Jon 2017–present

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*Portions of this report has been generated through information received from the National Association of Insurance Commissioners (NAIC). If a company failed to file a financial statement with the NAIC, it will not be listed in this report. If a company filed in prior years but failed to file this year, it may be on the report but no figures will be shown.*

*If you find inaccuracies or have questions about the company-specific information, you are requested to contact the insurance company directly for verification of the data.*



**SERVING**  
**NORTH DAKOTA**  
**RESIDENTS & BUSINESSES**

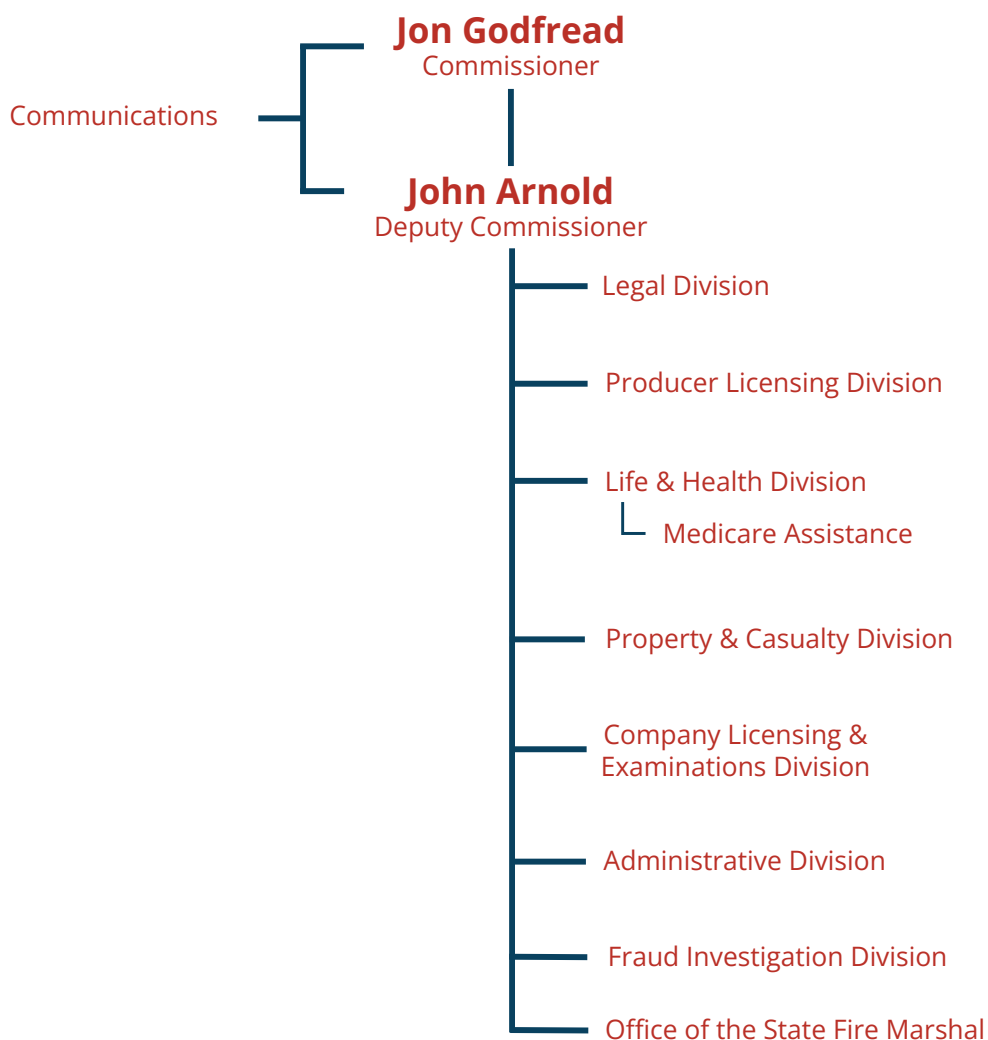
North Dakota Insurance & Securities Department

# ABOUT US

The North Dakota Insurance & Securities Department oversees the insurance marketplace that exists within the state of North Dakota. Established in 1889, the department serves the public by providing education, regulation, and enforcement of insurance laws and policies. The Department also serves as an advocate for consumers treated unfairly by insurance companies. North Dakota is part of the U.S. insurance regulatory framework that is designed to promote fairness and protect consumers in the complexity of the U.S. insurance marketplace. As a member of the National Association of Insurance Commissioners (NAIC), North Dakota joins a coalition of state regulatory agencies to help establish standards and best practices, coordinate regulatory oversight, and conduct peer reviews.

During the 2023-2025 biennium, the Department consisted of eight divisions under the Insurance Commissioner, elected by the people of North Dakota.

## Organizational Structure



## Department Divisions

<b>Legal</b>	<p>The Legal Division provides counsel to Department leadership and staff, handles legal proceedings, and interacts with the courts, as needed, on behalf of the Department. Staff attorneys also draft orders and other legal documents. The Division will also initiate the appropriate investigation and enforcement of agents and companies who violate insurance laws.</p>
<b>Producer Licensing</b>	<p>All persons seeking to sell insurance products in North Dakota must be licensed by the Department. Staff is responsible for licensing approximately 100,000 resident and non-resident insurance producers by issuing, renewing, and performing ongoing maintenance of licenses. The Division handles license applications, renewals, appointments, and continuing education reporting.</p>
<b>Life &amp; Health</b>	<p>All life and health insurance products sold in North Dakota must be given an actuarial analysis and reviewed to ensure the product and benefits follow North Dakota laws.</p> <p>Staff can assist consumers with life and health insurance questions and issues.</p>
<b>Property &amp; Casualty</b>	<p>This Division reviews policy and rate form filings from property and casualty insurance companies to ensure that policy language complies with state law, adequately reflects the benefits provided by the policy.</p> <p>Consumer assistance staff are available for property and casualty insurance questions and issues.</p>
<b>Company Licensing &amp; Examinations</b>	<p>At the heart of insurance regulation is solvency oversight. The Division is responsible for monitoring insurance companies' financial strength to ensure they have enough money to pay policyholder claims. The Division performs periodic financial audits of domestic companies to ensure they are financially sound and complying with state laws. This Division also administers the licensing of approximately 1,600 insurance companies in North Dakota.</p>
<b>Administration</b>	<p>The Administration Division of the Department oversees the budget, accounts receivable and payable, purchasing, information technology needs, and general office support throughout the Department. This Division also oversees business operations, human resource management, public relations, and internal policies and procedures for the Department.</p>
<b>Fraud Investigation</b>	<p>Insurance fraud is a crime that can affect everyone. The Department receives and investigates cases of insurance fraud that occur in the state.</p> <p>Our team works with local State's Attorneys' offices to investigate, charge, and prosecute cases. In many counties, our Department leads the prosecution of insurance fraud cases.</p>
<b>State Fire Marshal</b>	<p>Provides statewide fire prevention services through fire investigations, inspections, construction plan review, community risk reduction, and fire data reporting. The office works closely with local fire departments to improve safety, strengthen prevention efforts, and support code compliance across North Dakota. The State Fire Marshal's Office also offers training, education, and technical assistance to support fire service professionals and protect communities statewide.</p>

# BY THE NUMBERS

## Premiums

*In 2023 & 2024, North Dakota policyholders paid a total of approximately*

**\$19.5 billion**

*in premiums to insurance companies.*

## Claims

*In 2023 & 2024, insurance companies paid approximately*

**\$10.6 billion**

*in claims to North Dakota policyholders.*

## Licensing

<b>Licensed Producers</b>	<b>2024</b>	<b>2023</b>
Resident	5,274	5,323
Non-Resident	90,526	92,678
<b>Total</b>	<b>95,800</b>	<b>98,001</b>

<b>Licensed Business Entities</b>	<b>2024</b>	<b>2023</b>
Resident	926	930
Non-Resident	8,228	8,266
<b>Total</b>	<b>9,154</b>	<b>9,196</b>

<b>Total Licensees</b>	<b>104,954</b>	<b>107,917</b>
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## Product Filing

### Life & Health

Year	Received	Approved*	Disapproved
<b>2024</b>	1,783	1,709	49
<b>2023</b>	1,901	1,844	38

\*Life & Health numbers include life and annuity products approved under the Interstate Insurance Compact.

### Property & Casualty

Year	Received	Approved*	Disapproved
<b>2024</b>	2,690	2,610	60
<b>2023</b>	2,958	2,867	71

\*'Approved' numbers include any filing that was approved, filed only and informational. 'Disapproved' numbers include filings that were disapproved, rejected and withdrawn. 'Approved' and 'disapproved' figures do not necessarily equal the 'received' filing amount because the filing period was not contained to a single calendar year.

## Fraud Investigation Cases

Action	2024	2023
For Information Only	69	79
Investigative Criteria Not Met	27	16
Jurisdiction	65	49
No Evidence of a Crime	44	61
Prosecuted	3	9
Prosecution Declined	0	1
Prosecution Not Appropriate	4	8
Statute of Limitations	10	3
Unable to Prove Beyond a Reasonable Doubt	28	63
Open Cases	75	17
<b>Total Fraud Cases</b>	<b>325</b>	<b>306</b>

## Enforcement

### Complaints

	Agent Complaints	Company Complaints
<b>2024</b>	22	179
<b>2023</b>	13	110
<b>Total Actions</b>	<b>35</b>	<b>289</b>

### Agent Actions

	2024	2023
<b>Cease &amp; Desist</b>	0	0
<b>Fines</b>	13	3
<b>Probations</b>	9	5
<b>Revocations</b>	1	2
<b>Suspensions</b>	0	0
<b>Other</b>	0	1
<b>Total Actions</b>	<b>23</b>	<b>11</b>
<b>Total Fines</b>	<b>\$1,600</b>	<b>\$0</b>

These administrative actions do not reflect the suspensions and revocations for noncompliance with continuing education requirements in the State of North Dakota.

### Company Actions

	2024	2023
<b>Cease &amp; Desist</b>	0	0
<b>Fines</b>	2	4
<b>Probations</b>	0	0
<b>Revocations</b>	0	1
<b>Suspensions</b>	0	0
<b>Other</b>	0	0
<b>Total Actions</b>	<b>2</b>	<b>5</b>
<b>Total Fines</b>	<b>\$7,392.86</b>	<b>\$196,251.61</b>

The total number of actions may reflect multiple penalties of an individual action.

## *Classification & Number of Insurance Companies Licensed in in North Dakota*

Accredited reinsurer	43
Benevolent	0
CHAND	1
Certified reinsurers	9
County mutual	9
Discount Plan Organizations	16
Fraternal	16
Gift annuities	265
Government self-insurance pools	1
Group health insurance purchasing cooperative	1
Health maintenance organization	4
Life	443
MEWA	12
Medical (HMDI)	5
Organizations	5
Premium finance	27
Prepaid legal	5
Prepaid limited health	1
Property/casualty	857
Purchasing groups	273
Reciprocal	5
Reciprocal Jurisdiction Reinsurers	35
Reinsurance intermediary	43
Risk retention	90
Self-insurers	4
Surplus lines	251
Title	20
Trust	0
Trusted reinsurers	12
Utilization review	94
Viatical Settlement Providers	8
<b>Total</b>	<b>2,576</b>

## ***New Company Licenses***

2023	2024
71	53

## ***Company Name Changes***

2023	2024
33	32

## ***Company Mergers***

2023	2024
6	9

## ***Company Actions***

(Suspensions, Revocations, Withdrawals)

2023	2024
13	22

## ***Company Abstracts***

To view abstracts for all companies licensed in North Dakota, visit our [website](#).

# CONSUMER ASSISTANCE



Launched in 2003, Prescription Connection is a program that connects kids, families and people of all ages with free and discounted prescription drugs.

Year	Persons Assisted
2024	17
2023	18

Relief is based on national averages for prescription costs.



The North Dakota State Health Insurance Assistance Program (ND SHIP) was established in 1993 to provide local, unbiased, free and confidential assistance to Medicare recipients.

ND SHIP Counselors are comprised of Department staff and trained volunteers. Funding is provided by a federal grant from the Administration for Community Living.

Assistance is available year-round with Medicare products and processes. Counselors are trained in all aspects of Medicare, including original Medicare (Parts A & B), Part D prescription plans, Part C plan (Medicare Advantage and Cost Plans) and supplements. Counselors can assist with coverage questions, claims, paperwork, appeals and policy comparisons.

ND SHIP staff and counselors engage with community groups and organizations by offering workshops and presentations. Each month, staff send an informational packet on Medicare and related topics to North Dakotans turning 65.

Year	Number of Contacts	Relief
2024	4,787	\$1,137,293.20
2023	4,678	\$2,445,105.68

## ***House Bills Passed in 2025***

- › HB 1010 - A bill for an Act to provide an appropriation for defraying the expenses of the insurance commissioner. (Department budget)
- › HB 1026 - Relating to changing the administration of the state bonding fund from the insurance commissioner to the office of management and budget.
- › HB 1027 - Relating to changing the administration of the state fire and tornado fund from the insurance commissioner to the office of management and budget.
- › HB 1086\* - Relating to the use of the reduced cigarette ignition propensity and firefighter protection act enforcement fund.
- › HB 1087\* - Relating to licensing for administrators of life and health insurance and pharmacy benefit managers.
- › HB 1088\* - Relating to penalties for violation of the insurance title; and to provide a penalty.
- › HB 1114 - Relating to individual and group health insurance coverage of insulin drugs and supplies.
- › HB 1123\* - Relating to fees charged by the insurance commissioner.
- › HB 1124\* - Relating to the standards and management of an insurer with an insurance holding company system and the confidential treatment of investigation and examination records of insurance holding companies.
- › HB 1216 - Relating to out-of-pocket expenses for prescription drugs; relating to self-insurance health care plans.
- › HB 1248 - Relating to the cost-benefit analysis requirement for health insurance mandated coverage of services.
- › HB 1311 - Provide for a legislative management study regarding volunteer emergency responder recruitment and retention.
- › HB 1322 - Relating to ambulance service provider reimbursement.
- › HB 1398 - Relating to the publication of an abstract of annual statement.
- › HB 1471 - Relating to dental benefit plan method of payment options.
- › HB 1481 - Relating to dental insurer rate filing requirements.
- › HB 1543 - Provide for a legislative management study regarding prescription drug pricing and the maximum fair price as determined by the federal government.
- › HB 1584 - Relating to pharmacy benefits managers; to provide a penalty; and to declare an emergency.

## ***Senate Bills Passed in 2025***

- › SB 2027 - Relating to floodplain management powers and ordinances for counties, cities, and townships.
- › SB 2032 - Relating to the comprehensive health association of North Dakota.
- › SB 2088\* - Relating to data security requirements for insurance producers.
- › SB 2090\* - Relating to updating language for the state fire marshal department and to the attorney general's authority to appoint the state fire marshal; relating to fund fees collected by the state fire marshal department.
- › SB 2091\* - Relating to requirements for reinsurance association of North Dakota claims; and to declare an emergency.

## ***Senate Bills Passed in 2025 (continued)***

- › SB 2092\* - Relating to life settlement producer licenses and reporting requirements.
- › SB 2124\* - Relating to insurance company definitions, insurance company inquiries, insurance company statements and examination records; and to declare an emergency.
- › SB 2125\* - Relating to obligations of insurance producers to maintain an electronic mailing address for regulatory use, producer's lines of insurance, service of process for producer proceedings, revocation of nonresident producer licenses, requirements for renewal of business entity public adjuster licenses, public adjuster proof of insurance requirements, and public adjuster continuing education requirements.
- › SB 2135 - Relating to the firefighters death benefits fund.
- › SB 2157 - Provide for a legislative management study relating to the creation of a farm safety insurance discount program.
- › SB 2172 - Relating to long-term care insurance policy terms and claim payments.
- › SB 2214 - Relating to the insurance commissioner assuming the duties of the securities commissioner.
- › SB 2218 - Provide an appropriation to the insurance commissioner for a North Dakota firefighter's association grant; and to declare an emergency.
- › SB 2249 - Provide for a legislative management study relating to health care mandates.
- › SB 2280 - Relating to prior authorization for health and dental insurance.
- › SB 2340 - Provide for a legislative management study to evaluate the evolving fire service operational and response needs of the state.
- › SB 2348 - Relating to the acceptance of health care sharing ministries by an institution of higher education and health care sharing ministries' exemptions from insurance laws and regulations.
- › SB 2370 - Relating to individual and group health insurance coverage of insulin drugs and supplies.
- › SB 2374 - relating to mandatory arbitration endorsements for property insurance, managed repair programs, civil remedy actions against property insurers, notice of property insurance claims, and surplus lines insurance policies; relating to the presumption and delegation of control in insurance holding company systems, exceptions to unauthorized insurance transactions, exceptions for large commercial risks in fire, property, and casualty insurance rates, surplus lines insurance, risk retention groups and purchasing groups, restrictions on insurance purchased by purchasing groups, and purchasing group taxation and fees; relating to an exemption from search requirements for licensed surplus line producers; and to provide a penalty.
- › • SB 2375 - Relating to joint negotiations by dental providers with dental insurers.
- › • SB 2377 - Relating to preferred provider arrangements and restrictions on dental care services.

\*Department-Introduced Legislation

# ADMINISTRATIVE RULES

Effective January 1, 2024

## ***10-07 - Fire Marshal***

With the passage of SB 2270 during the 68th Legislative Assembly, the North Dakota State Fire Marshal's Office transitioned from the Office of the Attorney General to the Insurance Department. As part of this move, the previous rules under the Attorney General's Office are being repealed and re-established under the Insurance Department's authority to ensure proper alignment and administration.

## ***45-01-01 - Organization of the Department***

This rule update incorporates the State Fire Marshal into the Insurance Department's organizational structure and administrative rules. It also removes outdated references to the Petroleum Tank Release Compensation Fund, which transferred to the Department of Environmental Quality in 2019, and the Unsatisfied Judgment Fund, which was eliminated by HB 1183 in the 2023 Legislative Session.

## ***45-03-15 - Accounting Practices and Procedures vvv***

These updates reflect the most current statutory accounting principles required for insurers when completing annual and quarterly statement filings.

## ***45-06-06 - Regulation to Implement the Small Employer Health Insurance Availability Act***

As it currently stands, this process creates more work for insurance companies. The Department already has access to this particular information through the financial statements provided annually. The proposed amendment removes this requirement to streamline processes.

## ***45-09-01 - Surplus Lines Insurance***

The current rule requires insurance companies to submit information that the Department already receives through annual financial statements, creating unnecessary duplication. This amendment removes the extra reporting requirement, streamlining processes and reducing administrative burden for insurers.

## ***45-10 - Petroleum Tank Release Compensation Fun***

The Petroleum Tank Release Compensation Fund was transferred to the Department of Environmental Quality in the 2019 Legislative Session. Since DEQ now administers the program and has its own established rules, this rule amendment removes related language from the Insurance Department's section.

## ***45-12 - North Dakota Boiler Rules***

Similar to the Petroleum Tank Release Compensation Fund transition, the North Dakota Boiler Rules were moved to the Department of Environmental Quality during the 2019 Legislative Session. Because DEQ now oversees the program and maintains its own administrative rules, this update removes the Boiler Rules from the Insurance Department's rule section.

## ***45-12 - Fire Marshal***

This rulemaking updates the State Fire Marshal's administrative rules as required under N.D.C.C. 18-01-04 and supports the adoption of the 2021 International Fire Code. The amendments ensure state and local fire codes remain aligned, reflecting recommendations developed through a collaborative review by local fire marshals. Aligning these codes creates greater consistency across jurisdictions, supporting a fair regulatory environment, improving fire prevention efforts, and promoting uniform guidance for fire safety professionals statewide.



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