DATE: March 16, 2020

TO: All Title Insurers

RE: Scheduling of Title Insurance Producers on Site Reviews

On March 5, 2020, Governor Larry Hogan issued a Proclamation declaring a State of Emergency and that a Catastrophic Health Emergency exists in the State of Maryland.

In light of the Governor’s Proclamation of a State of Emergency, the Maryland Insurance Administration has received inquiries from Title Insurers regarding their concerns pertaining to the requirement that on site reviews be conducted in the agent’s office while the state of emergency is in effect.

Please be advised that Section 31.04.22.04 of the Code of Maryland Regulations requires the following:

.04 Conducting an On-Site Review.

A. A title insurer:

(1) Shall, except as provided in §A(4) of this regulation, conduct an on-site review during each calendar year of the underwriting, claims, and escrow practices of each principal agent;

Please be advised, that if a title insurer believes that it is not safe to conduct an on-site review in the agent’s principal place of business, pursuant to COMAR 31.04.22.01, it is permissible to reschedule that audit for a later date, but the audit must be completed on or before December 31, 2020.

Should you have any questions concerning this Bulletin, please contact Ms. Erica J. Bailey, Associate Commissioner Compliance & Enforcement or Mr. David A. Zitterbart, Chief
Enforcement Officer, Compliance and Enforcement, Title Unit by e-mail at david.zitterbart@maryland.gov or by telephone at (410) 468-2144.

AL W. REDMER, JR.
Commissioner

Signature on original

By: _______________________________

Erica J. Bailey,
Associate Commissioner
Compliance & Enforcement