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### **PROPOSED BULLETIN**

**To: All Title Insurers and Title Insurance Producers**

**Re: Law Firms – Producer Registers**

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This Bulletin is issued to advise title insurers of the need to include law firms in their producer register pursuant to §10-118 of the Insurance Article and Code of Maryland Regulations (“COMAR”) 31.03.13.

Through market conduct examinations, the Maryland Insurance Administration (“MIA”) has learned that title insurers may not be including law firms that have been appointed as a principal agent in their producer register. Section 10-125 of the Insurance Article provides an exemption to the licensing, bonding, education, experience, and examination requirements of title insurance producers to law firms that meet the definition contained in §10-125(a)(3) of the Insurance Article. However, law firms are still subject to the requirements of §10-118 of the Insurance Article and COMAR 31.03.13, as these law firms meet the definition of an insurance producer under §1-101(u) of the Insurance Article and as used in §10-118 of the Insurance Article, and are not exempt from those provisions.

COMAR 31.03.13.02B(1)(b) requires that the producer register include the Maryland license number of each insurance producer on the register. Because law firms are exempt from licensing requirements, they do not have a producer license number and, thus, this field may be left blank when adding law firms to the producer registry.

Title Insurers should verify that they have included law firms in their producer register and that they have the necessary procedures in place to ensure that any newly appointed law firm is added to the producer register within 30 days of the appointment.

Please [be advised that comments are public and will be posted to the MIA website.](#) Please submit any questions or comments concerning this proposed bulletin to:

Erica J. Bailey, Associate Commissioner, Compliance & Enforcement, at [erica.bailey@maryland.gov](mailto:erica.bailey@maryland.gov) or (410) 468-2113, and

Jason Decker, Chief of Market Conduct Property & Casualty, at [jason.decker@maryland.gov](mailto:jason.decker@maryland.gov) or (410) 468-2321.