

Greg Welker, CFE
Antifraud & Producer Licensing Program Manager
Market Regulation Department
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
Kansas City, MO 64106

RE: Limited Lines Pet Health Insurance

Dear Mr. Welker:

Great Plains Society for the Prevention of Cruelty to Animals ("Great Plains SPCA") opposes any effort by the NAIC to eliminate the pet insurance limited lines license.

Pet Insurance can mean the difference between a pet being adopted from a shelter, or remaining in the shelter and being killed. Pet insurance can also prevent many people from abandoning pets if the pet develops health problems.

We find that the most cogent time that consumers consider pet insurance is when they are acquiring the pet. Much like the purchaser of a mobile phone obtains mobile phone insurance at that moment, people considering adopting a pet are most likely to purchase it, and actually adopt the pet, at the time they are looking at the pet they want to adopt. Yet pet insurance is very difficult to offer at that moment. Shelters and other adoption agencies simply don't have the resources to have their employees conduct the pre-licensing education, take a test, send in fingerprints, obtain a license, and keep up with continuing education. The pre and post license education, and the test, cover topics that have no bearing on the very narrow line of insurance that needs to be offered...pet insurance.

Every day we see people visit a shelter, consider adopting a pet, and then leaving empty handed, and it's because they fear the long term costs of potential medical problems. Worse, we oftentimes see the same pets end up back in the shelter due to the costs associated with maintaining the health of the adopted pet. It's heartbreaking, and can easily be avoided in more instances if we are able to make pet insurance more available through a limited lines license process.

Finally, for those few that do get pet insurance, it appears they acquire it online in many instances. There is no live agent involvement in this process, so why should a pet adoption counselor in a shelter trying to save a pet have to be a fully licensed property and casualty insurance agent?

Please maintain the option of a limited lines license for pet insurance.

Sincerely,

Jami D. Waggoner Interim CEO

**Great Plains SPCA** 

INDEPENDENCE CAMPUS (816) 621-SPCA (7722) Pet Adoption & Intake Center

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MERRIAM CAMPUS

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