

# INSURANCE

**Dave Heineman**  
Governor

**Bruce R. Ramage**  
Director

*A Message from the Director....*



Bruce R. Ramage

## **Health Carrier External Review Act**

Legislative Bill 147 was introduced at the request of the Department of Insurance during the 2013 Session of the Nebraska Legislature. The bill adopted the Health Carrier External Review Act (Act), thereby implementing a federal mandate to adopt a process for external review of internal decision making by health carriers. This will allow policyholders to have an independent review of decision making in such areas as admission, availability of care, and continued stay. LB 147 will require insurers to notify insureds of this review and the director of insurance to assign independent review organizations to conduct the review and provide processes for conducting the review.

The bill applies to all health carriers, but not to policies providing more limited benefits such as specified disease, hospital indemnity or Medicare supplement policies. The Act applies to any claim submitted on and after January 1, 2014.

The Department has proposed the adoption of a new regulation, Chapter 87, that prescribes a series of forms required to be used by health carriers, covered persons, and independent review organizations under the Act, Neb.Rev.Stat. §44-1301, et seq.

A public hearing regarding the adoption of Chapter 87 has been scheduled for 10:00 a.m., on August 22, 2013. A full copy of the notice and a draft copy of the proposed regulation can be obtained from the Department's website located at [www.doi.nebraska.gov/legal/rule\\_reg/](http://www.doi.nebraska.gov/legal/rule_reg/).

Inside:

**LEGAL 2**

- 2013 Legislative Bills Summary
- Producer/Company Actions
- Case Summaries
- Regulation Updates

**LIFE & HEALTH 7**

- Staff Updates
- Health Insurance Marketplace

**FRAUD 8**

- Annual Insurance Fraud Conference
- Using Social Media for Investigations
- Court Actions

**PROPERTY & CASUALTY 10**

- Subjective Rating Reminder
- Review of Completed Filings Available
- State of the Marketplace Survey

**EXAMINATION DIVISION 11**

- Holding Company Filings
- Financial Exams Completed

Department Calendar

Back

## LEGAL DIVISION

### **2013 Session of the Nebraska Legislature**

Following is a brief summary of bills tracked by the Department of Insurance. Please refer to the specific bill language to determine the full effect of the legislation summarized below. All bills are effective September 6, 2013 (90 days after the close of the legislative session) unless otherwise specifically noted. The full text of the legislation is available online at [www.nebraskalegislature.gov](http://www.nebraskalegislature.gov). For a copy of the bill as signed by the Governor, select "Slip Law".

**LB21 (Lathrop) Eliminate a Nebraska Workers' Compensation Act sunset provision for certain benefits.** Repeals the June 30, 2014 sunset provision in a bill that allows first responders to receive workers' compensation benefits for mental injuries. Before this legislation, mental injuries could only be claimed if accompanied by a corresponding physical injury. The effective date of LB 21 is the same date the law is scheduled to sunset, June 30, 2014.

**LB59 (Larson) Change a presumption relating to rebates to insurance agents.** Amends the rebate statute, section 44-361.01 to increase the percentages of a crop agent's total commissions and underwriting fees in a year from relatives or employers that would trigger a rebuttable presumption of a violation of the rebate law, from ten percent to thirty percent and a conclusive presumption of a violation from thirty percent to fifty percent.

**LB105 (Lathrop) Require child care licensees to obtain liability insurance.** Requires applicants for a license under the Child Care Licensing Act provide the Department of Health and Human Services with written proof of liability insurance coverage of at least one hundred thousand dollars per occurrence.

**LB133 (Hadley) Provide priority of insurance coverage relating to motor vehicle dealer loaner vehicles.** Adds a new section to the Motor Vehicle Industry Regulation Act to provide that when a customer is operating a loaner vehicle provided by a dealer while the customer's vehicle is being serviced and the policies covering the customer's vehicle and the dealer's loaner vehicle have mutually repugnant clauses regarding primary coverage, the customer's policy shall provide primary coverage and the dealer's policy shall provide secondary coverage.

**LB316 (Harr) Redefine automobile liability policy.** Provide that an automobile liability policy shall not "limit, reduce, or otherwise alter" as well as "exclude" liability coverage under the policy solely because an injured person making a claim is the named insured or residing in the household with the named insured.

**LB336 (Carlson) Change sickness and accident insurance provisions for policies subject to the federal Patient Protection and Affordable Care Act.** Provides that premium rates for sickness and accident insurance policies subject to the federal Patient Protection and Affordable Care Act shall be approved by the Director of Insurance before they are used in Nebraska. Policies subject to the bill would include any policy or certificate of sickness and accident insurance issued to or for associations not domiciled in Nebraska other than a certificate issued to an employee under an employee benefit plan of an employer headquartered in another state.

**LB337 (Schumacher) Change provisions relating to the Nebraska Insurers Supervision, Rehabilitation, and Liquidation Act.** Amends the Nebraska Insurers Supervision, Rehabilitation, and Liquidation Act with regard to the status in a rehabilitation or liquidation of an insurance company of a pledge, security, credit, collateral, loan, advance, or reimbursement or guarantee agreement or arrangement to which a Federal Home Loan Bank is a party. The bill would provide that security interests granted to the Federal Home Loan Bank are entitled to priority over the claims and rights of any party except the claims and rights of other secured parties entitled to priority by reason of actual perfected security interests and that the Federal Home Loan Bank's interests are valid and enforceable at any stage of a rehabilitation or liquidation proceeding.

**LB426 (Howard) Change provisions relating to fraternal benefit societies.** Applies the Risk Based Capital Act to Fraternal Benefit Societies. The bill prohibits assessment of policies by a domestic society until after the assessment is filed with and approved by the Director of Insurance and provides that the director may prohibit a foreign or alien society that has assessed its owners from issuing new contracts in this state.

**LB479 (Lathrop) Prohibit policy and contract terms relating to contractual rights and insurance proceeds.** Provide that no individual or group health coverage may assert any contractual rights to the proceeds of any resources purchased by a covered person, including medical payments coverage, uninsured or underinsured motorist coverage, accident or disability income coverage, specific disease or illness coverage, or hospital indemnity or other fixed indemnity coverage. Allows insurers to include a coordination of benefits provision based on rules and regulations of the director.

**LB568 (Harr) Provide for licensure of insurance navigators.** Provides for regulation by the Director of Insurance of individuals and entities applying for and acting as navigators with regard to a health benefit exchange established pursuant to the federal Patient Protection and Affordable Care Act, including an exchange established by the United States Department of Health and Human Services. Provide that no individual or entity may act as a navigator in this state unless registered as a navigator by the director. A navigator becomes registered by completing the training course prescribed by the US Department of HHS and paying a fee to the director not to exceed \$25 for individuals and \$50 for entities. Registration expires one year after the date of issuance. Navigators are prohibited from engaging in conduct in violation of the Producer Licensing Act, and specifically from recommending specific insurance products. The Director may suspend, revoke, deny or refuse renewal of the registration for violation of the act. The act is effective as of June 5, 2013.

**LR22 (Campbell) Provide the Health and Human Services Committee and the Banking, Commerce and Insurance Committee be designated to convene a Partnership Towards Nebraska's Health Care System Transformation.** Requires the Legislature's Health and Human Services Committee, in cooperation with the Banking, Commerce and Insurance Committee, to bring together policymakers and stakeholders at all levels, including state and local governments, public and private insurers, health care delivery organizations, employers, specialty societies, consumer groups, patients, consumers, and all other interested parties, to work in partnership with the shared objectives of controlling health care costs and improving health care quality. The Health and Services Committee may conduct public hearings; and with the Banking, Commerce and Insurance Committee of the Legislature work in cooperation with a stakeholder partnership, undertake communication, outreach, and educational activities to convey lessons learned and make recommendations relating to health care for Nebraskans. The committees shall hold a joint hearing prior to November 1, 2013, to be briefed on the information obtained by the Partnership as outlined in the resolution.

**Actions Taken Against Producers**

CAUSE NO.	ALLEGATION	DISPOSITION
<p>A-1971  <b>Nebraska Default &amp; Title Services Inc. d/b/a All States Title and Real Estate Services</b>                      Omaha, NE                      NPN - 8150235</p>	<p>Violated <u>Neb.Rev.Stat.</u> §§44-19,116(1)(e), 44-4059(1)(a),(b),(h),(j) and 44-4061(1). Making disbursements without receiving funds, providing incorrect, misleading, incomplete, or materially untrue information in the license application; violating any insurance law; using fraudulent, coercive, or dishonest practices; forging another's name to an application for insurance or any document related to an insurance transaction.</p>	<p>Consent Order                      Insurance producer license revoked                      05/17/2013</p>
<p>A-1975  <b>Jeffrey R. Morgan</b>                      Kearney, NE                      NPN-3188537</p>	<p>Violated <u>Neb.Rev.Stat.</u> §§44-4059(1)(h) and 44-4065(3). Using fraudulent, coercive, dishonest practices; not reporting criminal prosecution taken in any jurisdiction including all legal documents.</p>	<p>Order                      \$500 adminin. penalty                      05/28/2013</p>
<p>A-1980  <b>Catherine Burleigh a/k/a Catherine Fauss</b>                      Norfolk, NE                      NPN-6199551</p>	<p>Violated <u>Neb.Rev.Stat.</u> §§44-4054(8), 44-4059(1)(b), (h), 44-1525(11). Failure to provide notice of change of name or address within 30 days of change; violating any insurance law; using fraudulent, coercive, or dishonest practices, demonstrating incompetence, untrustworthiness, or financial irresponsibility of business; failure to respond in 15 business days.</p>	<p>Order                      Producer license suspended and \$500 admin. penalty                      05/28/2013</p>
<p>A-1981  <b>Justin McKinnon</b>                      Fremont, MI                      NPN-16606473</p>	<p>Violated <u>Neb.Rev.Stat.</u> §§44-4059(1)(b) and 44-4065(3). Violating any insurance law; failure to report any criminal prosecution taken in any jurisdiction. .</p>	<p>Order                      Producer license revoked                      06/12/2013</p>
<p>A-1982  <b>Davidson Insurance Agency &amp; Mark L. Davidson</b>                      Lincoln, NE                      NPN-240319</p>	<p>Violated <u>Neb.Rev.Stat.</u> §§44-4059(1)(b) and 44-1525(11). Violating any insurance law; failure to respond in 15 days.</p>	<p>Consent Order                      \$1,000 admin. penalty                      06/26/2013</p>

**Actions Taken Against Producers (cont.)**

CAUSE NO.	ALLEGATION	DISPOSITION
A-1984 <b>Lori L. Fitz</b> Fremont, NE  NPN-3193396	Violated <u>Neb.Rev.Stat.</u> §§44-4059(1)(b), and (h). Violating any insurance law; using fraudulent, coercive, or dishonest practices; demonstrating incompetence, untrustworthiness, or financial irresponsibility in business.	Consent Order \$500 admin. penalty 06/06/2013
A-1986 <b>David Brouillette</b> Lincoln, NE  NPN-16954018	Hearing requested for reconsideration of denial of application for resident producer license.	Order Producer license granted 06/19/2013

**Actions Taken Against Companies**

CAUSE NO.	ALLEGATION	DISPOSITION
C-2013 <b>Ullico Casualty Company</b> (Delaware)	Company placed into rehabilitation by state of domicile.	Order Certificate of Authority revoked 4/22/2013
C-2015 <b>Gramercy Insurance Company</b> (Texas)	Company placed into rehabilitation by state of domicile.	Order Certificate of Authority suspended 2/02/2013
C-2019 <b>Life Insurance Company of North                      America, Connecticut General Life                      Insurance Company and CIGNA                      Health &amp; Life Insurance Company</b> (Massachusetts)	Nebraska participated in the Multi- State Market Conduct Examination led by California	Multi-State Settlement 5/02/2013
C-2022 <b>TIAA-CREF Life Insurance Company,                      et al.</b> (Illinois)	Nebraska participated in the Multi- State Market Conduct Examination led by California	Multi-State Settlement 6/25/2013

## **Case Summaries**

### ***Beveridge v. Savage, 285 Neb. 991 (2013)***

Reid Beveridge, a landlord, and John Savage, a tenant, executed a lease agreement for a rental property. The lease required Savage to obtain a “liability and renter[']s insurance [policy]” in the amount of \$100,000 at the tenant’s expense, which he did. Beveridge maintained a separate insurance policy on the property. A fire started by the 6-year-old son of Savage’s wife caused significant damage to the house. Beveridge’s insurer paid the full cost of reconstruction, plus lost rent, and brought a subrogation action against the Savages in Beveridge’s name.

The District Court granted the Savages’ motion for summary judgment, holding that the Savages were coinsureds under Beveridge’s fire insurance policy and that Beveridge’s insurer could not subrogate against its coinsureds. Beveridge’s subsequent motion to alter or amend the judgment was overruled, and Beveridge appealed.

Subrogation is the right of one, who has paid the obligation which another should have paid, to be indemnified by the other. No right of subrogation can arise in favor of an insurer against its own insured, or coinsured, for a risk covered by the policy, even if the insured is a negligent wrongdoer.

In affirming the District Court’s ruling, the Nebraska Supreme Court relied on *Tri-Par Investments v. Sousa*, 268 Neb. 119 (2004). The Court noted that, absent an express agreement to the contrary, the law presumes that a tenant is coinsured under a landlord’s fire insurance policy, and therefore a landlord’s insurer cannot maintain a subrogation action against a tenant for damage to the insured property, even if it is caused by the tenant’s negligence. To rebut that presumption, the lease must expressly require the tenant to obtain fire insurance on the realty.

The question addressed by the Court, then, was whether the terms of this lease expressly required Savage to obtain fire insurance on the property. The relevant lease provision required Savage to obtain renters and liability insurance. The Court held that liability insurance can mean a variety of different insurance coverages, and the lease did not indicate what “liability” was to be covered. Because this requirement was ambiguous, the contract was construed against the drafter, Beveridge. Therefore the liability insurance requirement in the lease was insufficient to rebut the presumption that Savage and Beveridge were coinsured under Beveridge’s fire policy. Further, the Court held that the renter’s insurance provision also did not require the tenant to insure the building against loss by fire as renter’s insurance does not typically cover the structure of the leased premises. The Court found no other lease provision expressly putting Savage on notice that Beveridge, or his insurer, had a right of subrogation against Savage for damages caused by fire as a result of negligence.

The Court ultimately held that no provision in the lease overcame the presumption that the tenant is coinsured under the landlord’s fire insurance policy. Therefore Beveridge and his insurer may not bring a subrogation action against the Savages.

## ***Regulation Updates***

### **Proposed Regulation**

#### **TITLE 210, NEB. ADMIN. R. & REG. 87 - HEALTH CARRIER EXTERNAL REVIEW**

The proposed new regulation, Chapter 87, prescribes a series of forms which are required to be used by health carriers, covered persons, and independent review organizations under the Health Carrier External Review Act, Neb.Rev.Stat. §44-1301, et seq., adopted by the Legislature in 2013. A public hearing on the proposed adoption of Chapter 87 will be held at 10:00 a.m., on August 22, 2013, in the 5th Floor Conference Room of the Terminal Building, 941 O Street, Lincoln, Nebraska. A copy of the notice and a draft copy of the proposed regulation can be obtained from the Department's website at [www.doi.nebraska.gov/legal/rule\\_reg/](http://www.doi.nebraska.gov/legal/rule_reg/).

## **LIFE & HEALTH DIVISION**

### ***Staff Updates***

Stephen E. King has been named the division's new administrator following the resignation of Holly Blanchard. Stephen has over 30 years experience working in the insurance industry and is a welcome addition to the department. He can be reached by phone at 402-471-2201 or by email at [stephen.e.king@nebraska.gov](mailto:stephen.e.king@nebraska.gov).

### ***Health Insurance Marketplace Updates***

- The Department is in the process of developing a compilation of the completed filings which is expected to be posted during the week of August 5 to the Department's website at [www.doi.ne.gov](http://www.doi.ne.gov). It is important to note that while the Department will have completed its review, the proposed rates are still subject to final approval by The Center for Consumer Information and Insurance Oversight (CCIIO).
- A basic fact sheet containing information from the powerpoint presentation developed by CMS for agent/broker outreach meetings has been posted for a quick reference. The fact sheet can be found at [www.doi.nebraska.gov/aca/agents-navigators/ffm/out13258.pdf](http://www.doi.nebraska.gov/aca/agents-navigators/ffm/out13258.pdf) on our website. The full powerpoint presentation can be found on our website at [www.doi.nebraska.gov/aca/companies/ffm/AB\\_ParticipIndivSHOPMarket\\_070913\\_slides\\_5CR\\_061113.pdf](http://www.doi.nebraska.gov/aca/companies/ffm/AB_ParticipIndivSHOPMarket_070913_slides_5CR_061113.pdf).
- To stay abreast of the continual updates, monitor the Department's website at [www.doi.ne.gov](http://www.doi.ne.gov), monitor [healthcare.gov](http://healthcare.gov) and consider signing up for [regtap.com](http://regtap.com).

## FRAUD DIVISION

### ***13th Annual Insurance Fraud Conference***

The Insurance Fraud Prevention Division (IFPD) hosted its 13<sup>th</sup> Annual Insurance Fraud Conference on August 6, 2013, at Mahoney State Park. Lieutenant Governor Lavon Heidemann delivered opening remarks and presented the proclamation designating August 4-10, 2013, as “Insurance Fraud Awareness Week” in the State of Nebraska. The conference provided valuable information on utilizing social networks during the claims and investigative processes and the benefits of tactical communications in both our professional and personal lives.

Attendance at the conference provided six hours of general ethics and anti-fraud continuing education for insurance producers through the Nebraska Department of Insurance. The Nebraska State Bar Association also approved the conference for six hours of professional responsibility credits for attorneys.

### ***Using Social Media for Investigations***

Today’s Internet users have an average of 2.8 social network accounts. Information is often shared publicly through these sites allowing investigators access to an abundance of valuable information. Presenting at the Annual Fraud Conference was Roy A. Mura, Attorney with Mura & Storm, PLLC, in Buffalo, New York, who provided a presentation on finding and using social media content as part of the investigative process. The presentation focused on:

- the rapidly increasing use of social networking sites;
- the investigative benefits to law enforcement and the insurance industry;
- a list of social media sites that will be helpful when conducting online investigations;
- issues concerning the accessibility, legality, and privacy matters when gathering information through these mediums; and
- how to verify/authenticate and properly secure social media content.

The conference attendees were given valuable resources readily available to special investigators and claims personnel. For additional information concerning presentations given at the annual conference, contact [connie.drake@nebraska.gov](mailto:connie.drake@nebraska.gov).

### ***Court Actions***

#### **Douglas County District Court, CR10-9076262**

##### **State v. Mark E. Rose**

After serving a robbery sentence in Iowa, former insurance agent Mark Rose was charged in Douglas County with five felony counts of insurance fraud related to investigations conducted by the IFPD. Charged with pocketing client premiums, Mr. Rose subsequently pled guilty to three counts of insurance fraud, Class III felonies. Mr. Rose was sentenced to the Nebraska Correctional Center for three years for each count, to be served concurrently, and ordered to pay court costs.



**Keith County District Court, CR12-77****State v. Richard D. Weber**

Richard Weber, a former insurance agent, was charged with two counts of fraudulent insurance acts, Class III felonies. Pursuant to a plea agreement, count one was dismissed and count two was amended to an attempted fraudulent insurance act, a Class I misdemeanor, in exchange for Mr. Weber's guilty plea. On March 25, 2013, Mr. Weber was sentenced to probation and must pay restitution to the insurance company and the IFPD for their investigative costs.

**Lancaster County Court, CR13-1164****State v. Tanya L. O'Neal**

A citation for false reporting to a police officer was issued to Tanya O'Neal after an investigation was conducted by the IFPD. Ms. O'Neal was suspected of providing bogus information pursuant to an insurance claim involving her registered vehicle. During the course of the investigation, it was determined that Ms. O'Neal provided false information to the police officer who responded to and investigated the automobile accident. Ms. O'Neal was fined \$200 plus court costs.

**Lancaster County Court, CR13-6980****State v. Daniel E. Lowe**

Daniel Lowe, a construction contractor, was charged with providing a fake insurance certificate reflecting liability coverage was in effect when, in fact, he had none. Judge Gale Pokorny fined Mr. Lowe \$100 and ordered him to pay court costs.

**Sarpy County District Court, CR12-452****State v. Carroll R. Reynolds**

Carroll Reynolds was convicted of insurance fraud in Sarpy County. Mr. Reynolds was accused of submitting fraudulent documentation pursuant to a claim involving the theft of his 1994 Oldsmobile. Mr. Reynolds was ordered to pay a \$500 fine plus court costs.

**Valley County District Court, CR11-20****State v. Lindora K. Franzen**

Lindora Franzen was found guilty to the amended charge of an attempted insurance fraud, a Class IV felony. Ms. Franzen was accused of submitting fictitious physician statements pursuant to a supplemental health insurance policy. Ms. Franzen received probation and must satisfactorily complete her probationary program and is required to make restitution to the insurance company.

**York County District Court, CR12-68****State v. Susan Schulz**

On February 19, 2013, Susan Schulz was found guilty of a Class IV felony of an attempted fraudulent insurance act after staging a burglary at her residence and reporting the loss to her insurance company. Ms. Schulz was sentenced to the Nebraska Department of Correctional Services for a period of 12-24 months. In addition, Ms. Schulz must pay court costs within 60 days of her release from prison.

## PROPERTY & CASUALTY DIVISION

*Companies often file IRPM plans with us – usually the industry standard of +/- 25%, however, this is a subjective rating plan and it is no longer recognized in Nebraska.*

### **Reminder—Subjective Rating No Longer Recognized**

Please be reminded that Nebraska did away with all subjective scheduled rating in 2001. The statute that you may want to reference is §44-7512. Section 44-7509, which applies to most commercial lines of insurance, does allow a +/- 40% flex-rating to apply. Since this is allowed by statute, it does not need to be filed with us.

We often have companies file IRPM plans with us – usually the industry standard of +/- 25%. Since this is a subjective rating plan, it is no longer recognized in Nebraska. Filing such a plan will result in one of the property/casualty analysts sending an objection letter to you. This will result in a delay in the filing.

### **Review of Completed Filings Available**

*To view and copy completed filings, please call to reserve one of the public access computers and bring a disc or flash drive to use when copying.*

If you are coming in to view and copy completed filings that are on the public access computers, it is best that you call in advance to make an appointment so that we can make sure a computer is available for your use. It will also be necessary for you to bring a disc or flash drive to use when copying. We have two public access computers; however, since they are used by both the Life/Health and Property/Casualty Divisions, they are often busy. Setting up an appointment will ensure one is available when you arrive.

### **State of the Marketplace Survey**

*We are interested in which lines of insurance are easily underwritten, which lines of insurance are more difficult to write/place and anything else that affects the market.*

On occasion, we send out a survey asking about the state of the marketplace. If you receive a survey, we encourage you to complete and return it to our office as soon as possible. We try to get a cross-section of the state, however, in order to do so, it is imperative that everyone respond.

We are interested in which lines of insurance are easily underwritten, which lines of insurance are more difficult to write/place and anything else that affects the market. Thanks to all of you who have responded in the past.

**EXAMINATION DIVISION*****Holding Company and Dividend Filings***

Effective immediately, all holding company and dividend filings should be addressed to Annie Elliott, Deputy Chief Examiner. Contact information for Annie is by phone at 402-471-3164 or by email at [annie.elliott@nebraska.gov](mailto:annie.elliott@nebraska.gov). Please see the Nebraska Department of Insurance website at [www.doi.ne.gov](http://www.doi.ne.gov) for more information.

***Financial Examinations Completed During Second Quarter, 2013***

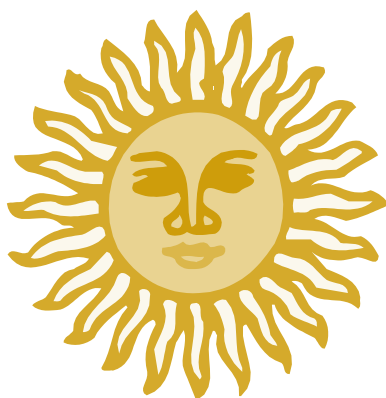
Ability Insurance Company  
American Family Life Assurance Co of Columbus  
Arch Excess and Surplus Insurance Company  
Arch Indemnity Insurance Company  
Arch Reinsurance Company  
Arch Specialty Insurance Company  
Battle Creek Mutual Insurance Co  
Censtat Casualty Company  
Central States Health and Life Co of Omaha  
Empire Fire and Marine Insurance Company  
Globe Life and Accident Insurance Company  
Lenders Protection Assurance Co RRG  
Liberty National Life Insurance Company  
United American Insurance Company  
USAA Direct Life Insurance Company

Financial examination reports become public documents once they have been placed on official file by the Department. The most current report of financial examination can now be found on the Department's website at [www.doi.ne.gov](http://www.doi.ne.gov). Copies can be obtained from the Department at a cost of \$.50 per page.

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 \* **Department Calendar** \*  
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- September 2: Department Closed – Labor Day
- October 14: Department Closed - Columbus Day Observed
- November 11: Department Closed - Veterans’ Day