

AGENT PERFORMANCE STANDARDS

Program Guide for Personal Lines

Agent Performance Standards Guide

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Agent Performance Standards Program Overview

Program Purpose

Citizens' mission is to efficiently provide property insurance protection in Florida to those who are, in good faith, entitled to obtain coverage through the private market but are unable to do so, while also providing levels of customer service that are comparable to the standards of the private market.

Our Agent Performance Standards Program ties in with our mission to provide high levels of customer service while meeting requirements set forth by Florida statute. This includes eligibility and the ability to market these risks through the Citizens Property Insurance Clearinghouse and our Depopulation Program, which reduce the risk of assessment on all Florida policyholders.

Citizens monitors agent performance by separately assessing the number of:

- Performance violations
- Late submissions

Important Dates in the 12-Month Rolling Submission Cycles

Performance and late-submission violations are tracked based on the number of submissions an agent has in the 12 months immediately before the violation being issued: 30 submissions or fewer, **or** 31 or more submissions. This 12-month period is called the *12-month rolling submission cycle*.

In addition, the number of violations in the rolling cycle is determined by the **violation issuance date**, rather than the effective date of coverage or the date of the submission:

Example Scenario	Result
<p>An agent submits a risk for coverage on March 31, 2021. The effective date of coverage is April 5, 2021.</p> <p>On April 15, 2021, a performance violation is issued relating to that March 31, 2021, submission.</p>	<p>The operative 12-month period is April 15, 2020, to April 15, 2021.</p>

Discipline for any violation will be based on the number of violations and the 12-month rolling submission cycle.

For more details on the disciplinary process, see:

- [Disciplinary Process for Performance Violations](#)
- [Disciplinary Process for Late Submission Violations](#)

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Performance Violations

Performance Violation Overview

An agent is responsible for reviewing each application they intend to submit to confirm the applicant meets all underwriting and eligibility requirements, and for ensuring all required documents are completed and submitted in accordance with the applicable underwriting guidelines.

Once submitted, risks are subject to underwriting review at any point during the policy term. When reviewed, Citizens staff will access policy data and cross reference it with all uploaded documentation and various other sources, including property appraiser and public records, to confirm the risk meets all requirements.

Important:

- Agents who submit risks in violation of Citizens underwriting rules or with incomplete documentation are subject to **performance violations**.
- Risks that do not meet all requirements are subject to declination, cancellation or nonrenewal.

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Performance Violations, Continued

Types of Performance Violations Under the program, Citizens is currently tracking and issuing performance violations when:

#	Performance Violation:	Occurs when an agent:
1	Circumventing the document submission process	Uploads an incomplete document, an incorrect document, or mislabels a document so that it appears to be a different type of document.
2	Submitting an ineligible risk	Fails to upload information demonstrating that the risk meets Citizens' eligibility requirements.
3	Submitting an uninsurable risk	Submits a risk that is uninsurable per the applicable underwriting manual.
4	Premium posted on an unbound risk	Premium is posted on an unbound risk prior to underwriting review and approval, regardless of the final determination of eligibility or insurability.
5	Failed to upload a premium finance company contract (when applicable)	Fails to upload a premium finance company contract when a policy is financed through a premium finance company.
6	Incorrectly applied credits, discounts or surcharges	Applies credits, discounts or surcharges with incorrect or incomplete documentation; or when the agent applies a credit, discount or surcharge that does not match the documentation provided.
7	Missing required signature(s) on the application and applicable supporting documents	Submits a document on which a signature is required (including Form OIR B1-1802), but has not been signed by the appropriate party.

Note: Citizens may begin tracking other categories of violations in the future.

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Performance Violations, Continued

Disciplinary Process for Performance Violations

Citizens uses a progressive, four-step disciplinary process for performance violations, which will be based on an individual agent's submissions (not the agency level) and on the number of submissions within a 12-month rolling cycle:

If an agent submits **30 or fewer** submissions in the 12-month rolling submission cycle:

# of Violations	More than 3	Within 6 months after warning notice	3 or more additional violations	Within 6 months after completing the 30-day suspension	1 or more additional violations	Within 90 days after completing the 90-day suspension	1 or more additional violations
Citizens Imposes	Warning Notice		30-day suspension		90-day suspension		Termination

If an agent submits **31 or more** submissions in the 12-month rolling submission cycle:

# of Violations	10% or more*	Within 6 months after warning notice	5 or more additional violations	Within 6 months after completing the 30-day suspension	3 or more additional violations	Within 90 days after completing the 90-day suspension	1 or more additional violations
Citizens Imposes	Warning Notice		30-day suspension		90-day suspension		Termination

*of total submissions for the 12-month rolling submission cycle.

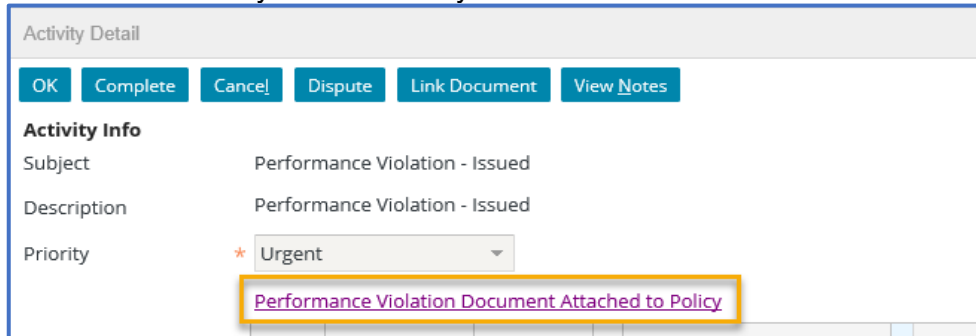
Example Scenario	Result
On April 10, 2021, an agent submits a risk and is issued a performance violation on April 16, 2021. From April 16, 2020, to April 16, 2021, the agent had fewer than 30 submissions. This is the agent's third violation in that 12-month period. The agent has not yet received a warning notice.	For purposes of determining whether the agent has triggered action based on the April 16, 2021, performance violation, the operative submission count is fewer than 30. Because this is the agent's third violation in that period, Citizens issues the agent a warning notice shortly after.
On July 15, 2021, the same agent submits another risk which results in a performance violation on July 30, 2021. This is his third performance violation since receiving the warning notice. However, from July 30, 2020, to July 30, 2021, the agent has 31 submissions.	For purposes of determining whether the agent has triggered discipline based on the July 30, 2021, performance violation, the operative submission count is 31. Thus, even though this is the third violation since receiving the warning notice, because the operative submission count is 31, the violation does not trigger a 30-day suspension.

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Performance Violations, Continued

Notification

Citizens will send the agent of record a notification of each performance violation via a PolicyCenter® activity:



The screenshot shows the 'Activity Detail' window in PolicyCenter. At the top, there are buttons for 'OK', 'Complete', 'Cancel', 'Dispute', 'Link Document', and 'View Notes'. Below these is the 'Activity Info' section with the following details:

Subject	Performance Violation - Issued
Description	Performance Violation - Issued
Priority	* Urgent

At the bottom of the activity detail, there is a link: [Performance Violation Document Attached to Policy](#), which is highlighted with a yellow box.

The agent can see details of the violation by opening it and/or in the *View Notes* section.

If there are violations to report, Citizens also will email agency principals each Monday with a list of all the performance violations for the agency from the previous week.

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Performance Violations, Continued

Disputing a Performance Violation

Citizens issues a performance violation based on the information and documentation uploaded for review in connection with a policy transaction. It cannot be removed through corrective action taken after the violation occurs.

A performance violation still may be valid regardless of Citizens' final determination of eligibility or insurability.

Example Scenario	Result
<p>An agent submits an application on March 31, 2021. In connection with that submission, and in support of wind mitigation premium credits, the agent submits a <i>Uniform Mitigation Verification Inspection Form</i> that is missing required signatures.</p> <p>On April 5, 2021, Underwriting reviews the form and issues a performance violation for missing signatures. On April 6, 2021, the agent disputes the violation and uploads a completed form with the required signatures.</p>	<p>The violation will be upheld as the form that was uploaded first was missing signatures.</p>

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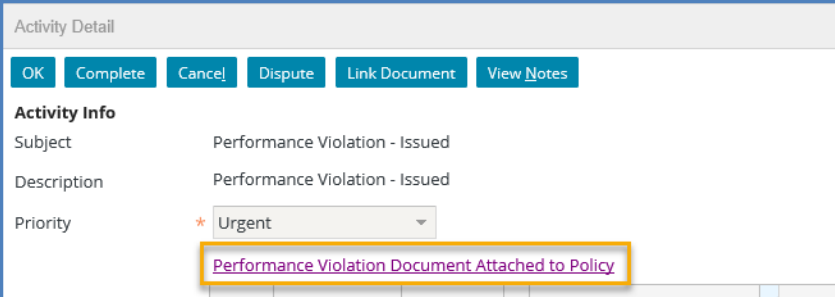
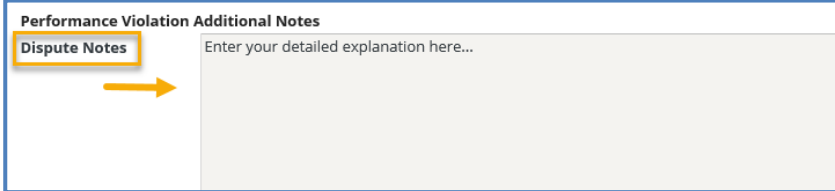
Performance Violations, Continued

Disputing a Performance Violation, continued

Submitting a Dispute

If issued a performance violation, an agent can dispute it within **five business days** of receipt of the performance violation notice. The dispute must include a clear statement of why the violation is being disputed.

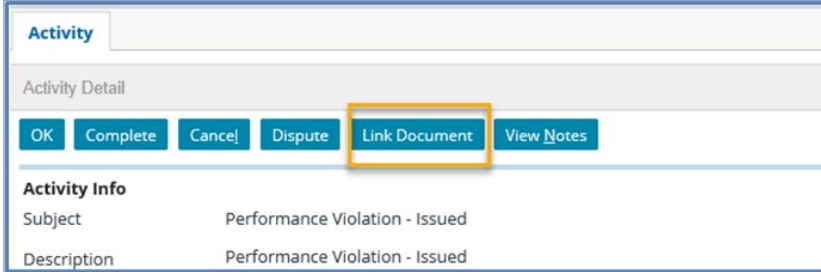
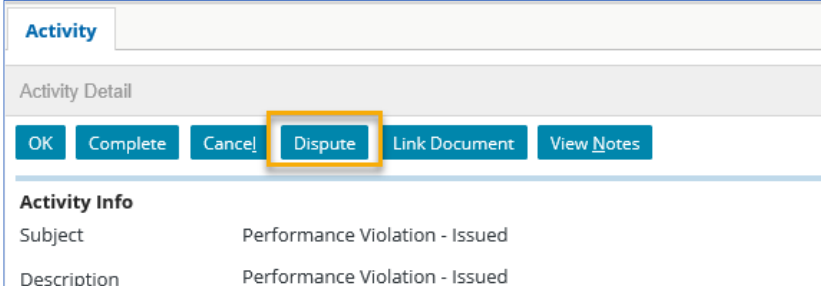
To dispute the performance violation and provide supporting documentation, log in to PolicyCenter and:

Step	Action
1	<p>Access the Performance Violation - Issued activity by:</p> <ul style="list-style-type: none"> A. Accessing the Desktop. B. Selecting the Subject link of the required Performance Violation - Issued activity. <p>Result: The <i>Activity Details</i> workspace displays in the lower portion of the policy <i>Summary</i> screen.</p>
2	<p>Select the Performance Violation Document Attached to Policy link to view the notice.</p>  <p>Result: A PDF of the notice opens in a separate window.</p>
3	<p>Provide a detailed explanation in the Dispute Notes section. Include the following:</p> <ul style="list-style-type: none"> • Why you are disputing the performance violation. • A timeline of events, if necessary. 

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Performance Violations, Continued

Disputing a Performance Violation, continued

Step	Action
4	<p>Select Link Document to attach documentation supporting the dispute.</p>  <p><i>Note:</i> Refer to the Uploading and Linking Documents job aid for more information on uploading documents to an activity.</p>
5	<p>Select Dispute to send the violation dispute to Underwriting.</p>  <p>Result: The <i>Activity Details</i> section closes and an activity is sent to the Underwriting Supervisor for review. You will receive an activity notifying you of the final decision.</p>

Late Submissions

Late Submission Violation Overview

Underwriting will not issue a policy until all required documents have been uploaded and the payment has been posted. A late submission occurs when the application and all required documentation are not submitted within **five business days** from the policy's effective date of coverage.

Violations **cannot** be:

- Removed through corrective action taken after the violation occurs
- Reassigned to a licensed customer representative

Note: An agent could be subject to a performance and late-submission violation if the documents, once submitted, are incomplete or do not adhere to Citizens underwriting guidelines.

Late Submission Alert, Violation and Notification Timeline

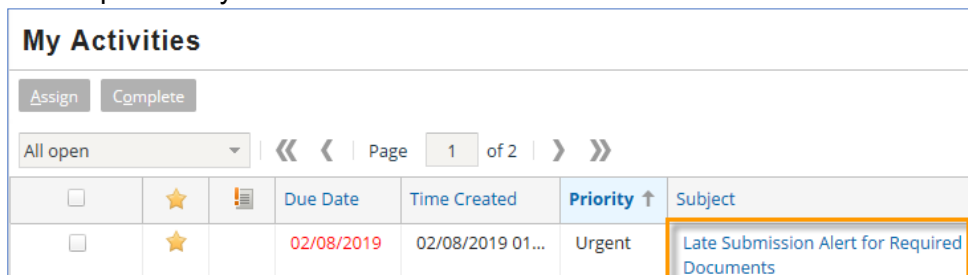
Timeline Begins: The Policy Effective Date

PolicyCenter automatically issues late-submission violations based on the effective date of the policy.

Late-Submission Alert: The Sixth Business Day

If all required documents have not been submitted by the fifth business day after the effective date of the policy, PolicyCenter will issue a *Late Submission Alert* on the **sixth business day** after the effective date.

The *Late Submission Alert* will be delivered as an activity on the agent's desktop in PolicyCenter:



My Activities						
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		
Assign		Complete				
All open		Page 1 of 2				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Due Date	Time Created	Priority ↑	Subject
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	02/08/2019	02/08/2019 01...	Urgent	Late Submission Alert for Required Documents

This alert warns that a late-submission violation will issue if the agent takes no action. This alert is **not** punitive and serves as a reminder that the submission is not complete.

Note: A *Late Submission Alert for Required Documents* cannot be disputed.

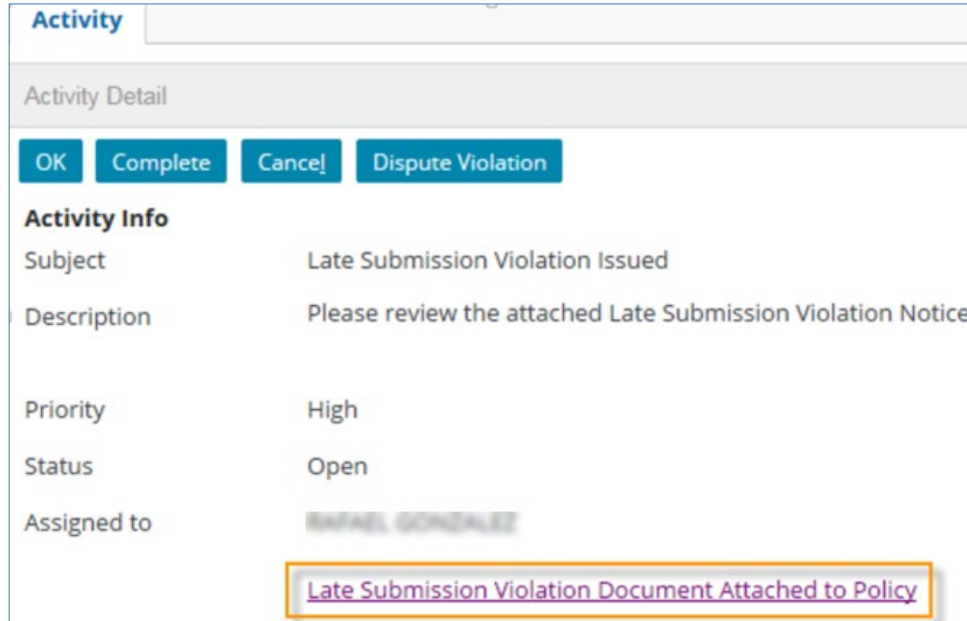
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Late Submissions, Continued

Late Submission Alert, Violation and Notification Timeline, continued

Late-Submission Violation: The Sixteenth Calendar Day

An agent will receive a *Late Submission Violation* via a PolicyCenter activity when all required documents have not been uploaded by the **sixteenth calendar day** after the effective date of the policy:



The screenshot shows a web interface for an activity. At the top, there is a search bar labeled 'Activity'. Below it is a section titled 'Activity Detail' containing four buttons: 'OK', 'Complete', 'Cancel', and 'Dispute Violation'. Underneath is the 'Activity Info' section with the following details:

- Subject:** Late Submission Violation Issued
- Description:** Please review the attached Late Submission Violation Notice
- Priority:** High
- Status:** Open
- Assigned to:** RAFAEL GONZALEZ

At the bottom of the activity info, there is a link labeled 'Late Submission Violation Document Attached to Policy' which is highlighted with a red box.

Dispute within Five Business Days

Agents will have **five business days** to [dispute the violation](#).

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Late Submissions, Continued

Disciplinary Process for Late Submission Violations

Citizens uses a progressive, four-step disciplinary process for late-submission violations, which will be based on an individual agent's submissions (not the agency level) and also on the number of submissions within a 12-month rolling cycle:

If an agent submits **30 or fewer** submissions in the 12-month rolling submission cycle:

# of Violations	More than 6 violations	Within 6 months after warning notice	6 or more additional violations	Within 6 months after completing the 30-day suspension	2 or more additional violations	Within 90 days after completing the 90-day suspension	1 or more additional violations
Citizens Imposes	Warning Notice		30-day suspension		90-day suspension		Termination

If an agent submits **31 or more** submissions in the 12-month rolling submission cycle:

# of Violations	20% or more*	Within 6 months after warning notice	10 or more additional violations	Within 6 months after completing the 30-day suspension	6 or more additional violations	Within 90 days after completing the 90-day suspension	1 or more additional violation
Citizens Imposes	Warning Notice		30-day suspension		90-day suspension		Termination

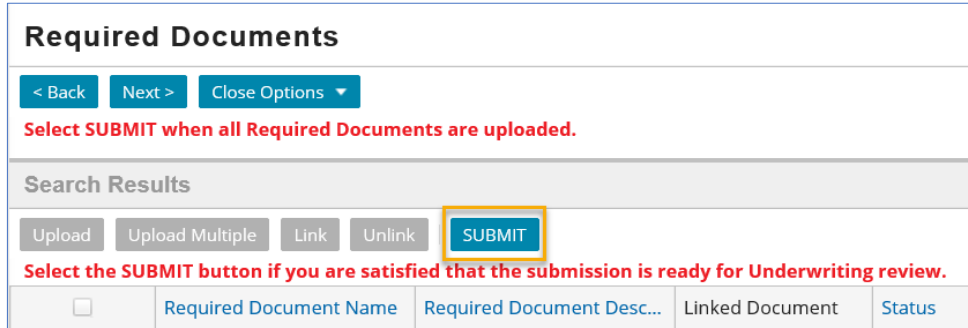
*of total submissions for the in the 12-month rolling submission cycle.

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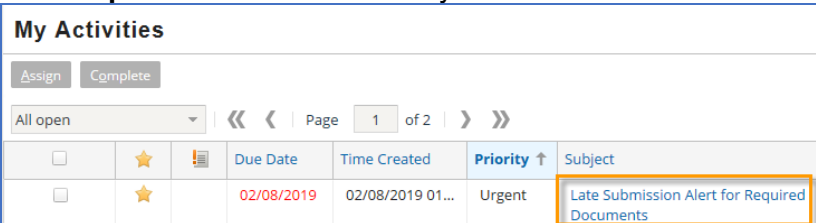
Late Submissions, Continued

Preventing a Late Submission Violation

Most commonly, late-submission violations are issued when an agent does not select **Submit** in PolicyCenter after all documents have been uploaded:



If you receive a *Late Submission Alert for Required Documents* activity, follow these steps to prevent a late-submission violation:

Step	Action
1	<p>Log in to PolicyCenter and access and review the <i>Late Submission Alert for Required Documents</i> activity.</p> <p>A. Access the desktop.</p> <p>B. Click the hyperlinked Late Submission Alert for Required Documents activity:</p>  <p>Result: The <i>Activity Details</i> workspace displays in the lower portion of the <i>Policy Summary</i> screen.</p>

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Late Submissions, Continued

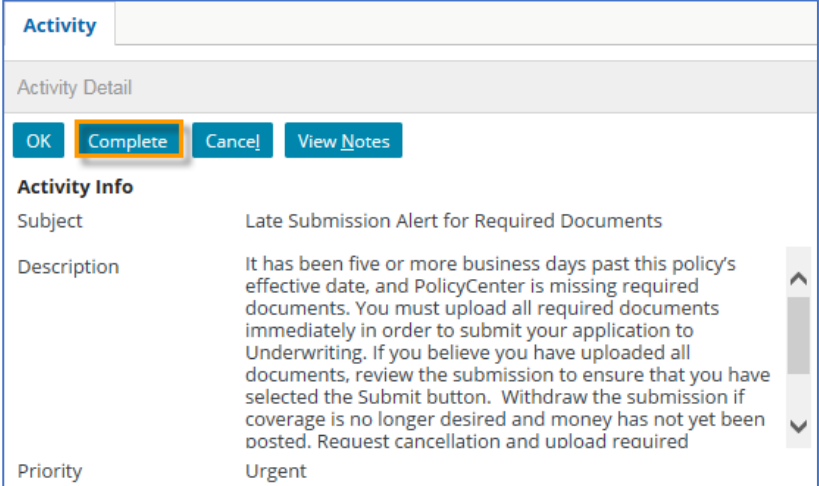
Preventing a Late Submission Violation, continued

Step	Action		
2	Review the submission to determine the reason for the alert:		
	If coverage is:	And payment has:	Then:
	Desired	Posted or not posted	Upload missing required documents, confirm payment has posted, and select SUBMIT . <i>Note: See the Uploading and Linking Documents job aid for more information.</i>
	Desired for a delayed home closing*	Not posted	Change the effective date. <i>Note: The effective date can be changed multiple times within the first 45 days of the original submission date. See the Creating an Effective Date Change Request job aid for more information.</i>
	No longer desired	Not posted	Withdraw the transaction. <i>Note: See the Withdrawing a Transaction job aid for more information.</i>
Posted		Initiate cancellation. <i>Note: See the Cancelling a Bound Submission with Payment job aid for more information.</i>	
<p>* For home closings, don't delay submission waiting for the final closing documents. Acceptable proof of new purchase can include any of the following documents:</p> <ul style="list-style-type: none"> • A copy of pages 1 and 2 of closing paperwork • A good faith estimate • A deed for newly acquired property • A copy of new lease agreement • Other documentation deemed acceptable by Underwriting 			

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Late Submissions, Continued

Preventing a Late Submission Violation, continued

Step	Action
3	<p>Select Complete to close the activity and remove it from your desktop:</p> 

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Late Submissions, Continued

Disputing a Late Submission Violation

Agents can dispute a late-submission violation when they have uploaded all required documents and selected the *SUBMIT* button within the allotted time.

Some rare reasons for a late-submission violation are:

- The violation generated before the fifteenth day beyond the effective date.
- The violation generated on an unbound submission or after a submission was cancelled or withdrawn.
- A system or technical issue which prevented the upload or submission of documents to PolicyCenter. The issue must be reported to Citizens.
- Citizens has given you incorrect instructions for handling a submission that the customer no longer requires.

A late-submission violation cannot be cured through corrective action taken after the violation is issued:

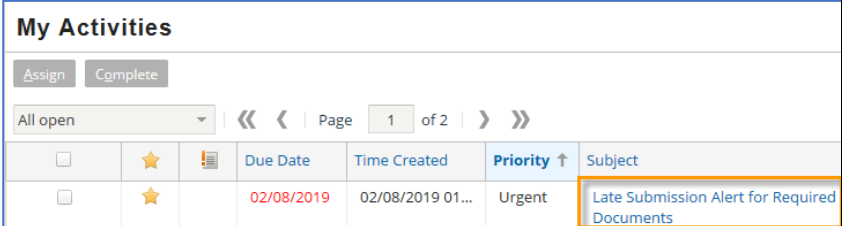
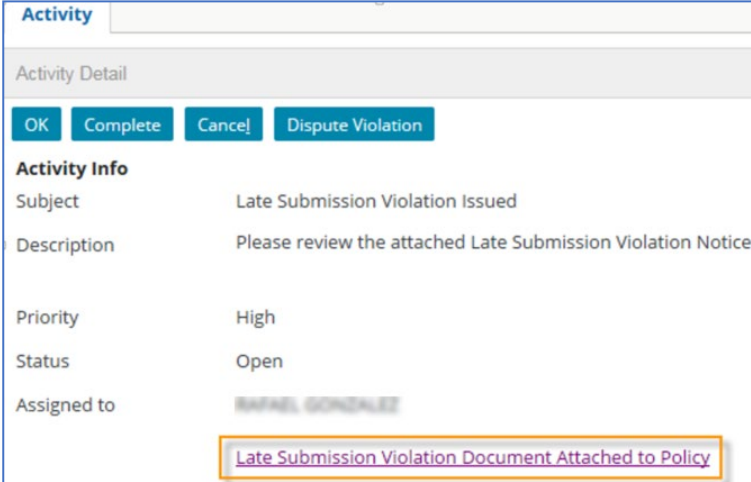
Example Scenario	Result
An agent is issued a late-submission violation while waiting for a delayed home closing. After the violation issues, the agent changes the policy effective date and disputes the late-submission violation.	The dispute is denied, and the late-submission violation stands. The agent did not submit the necessary documents or change the effective date prior to the violation being issued.

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Late Submissions, Continued

Disputing a Late Submission Violation, continued

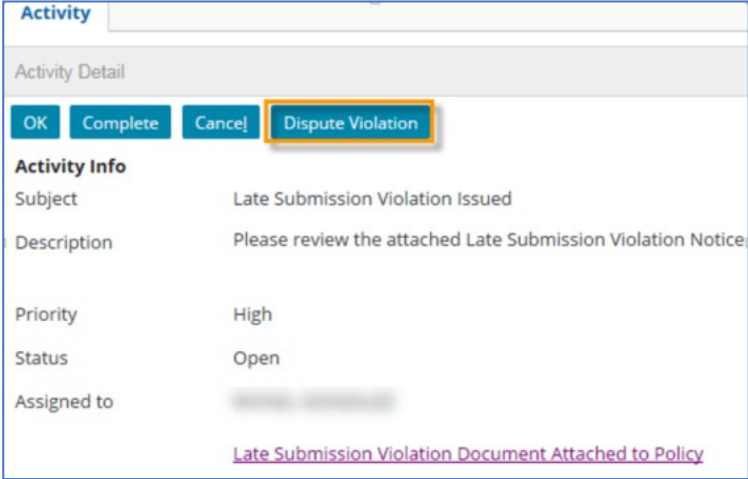
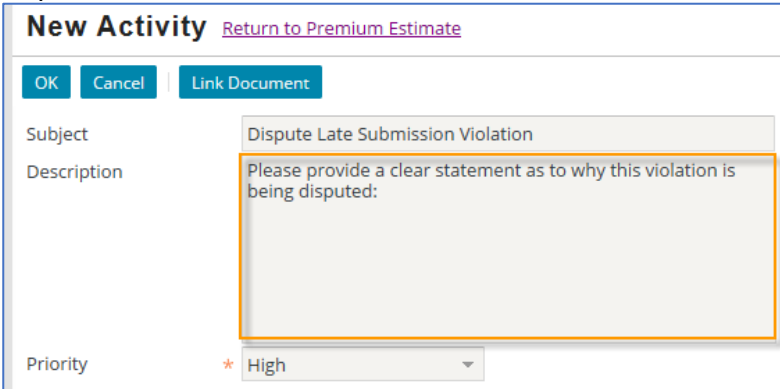
Late-submission violations must be disputed within **five** business days from the receipt of the violation. To dispute a late-submission violation, follow the steps below:

Step	Action
1	<p>Access the <i>Late Submission Violation Issued</i> activity:</p> <p>A. Access the desktop.</p> <p>B. Click the hyperlinked Late Submission Violation Issued activity.</p>  <p>Result: The <i>Activity Details</i> workspace displays in the lower portion of the <i>Policy Summary</i> screen.</p>
2	<p>Select the link to access the late-submission violation notice:</p> 

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Late Submissions, Continued

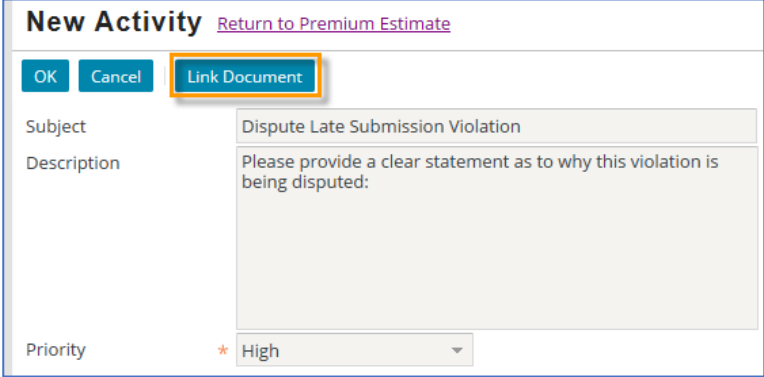
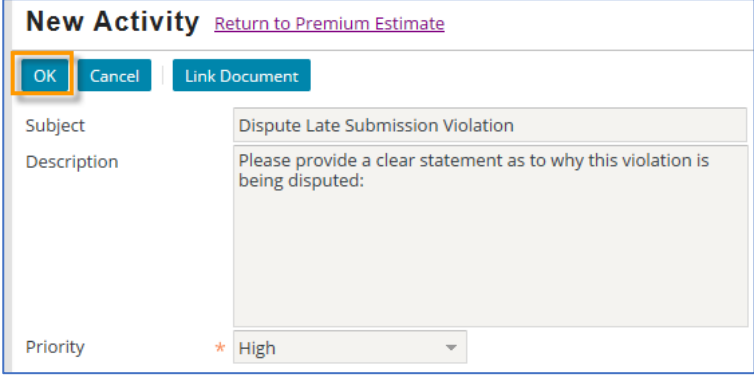
Disputing a Late Submission Violation, continued

Step	Action
3	<p>Return to the <i>Activity Detail</i> workspace and select Dispute Violation:</p>  <p>Result: A <i>New Activity</i> screen will open.</p>
4	<p>Enter a clear statement as to why the violation is being disputed.</p> 

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Late Submissions, Continued

Disputing a Late Submission Violation, continued

Step	Action
5	<p>If needed, select Link Document to link any documents to support the dispute.</p>  <p>Result: All documents associated with the policy will appear.</p> <p><i>Note:</i> The document intended to support your dispute will need to be uploaded to the policy prior to initiating the dispute.</p>
6	<p>Select OK to send your dispute to Agent Compliance staff.</p>  <p>Result: A new activity to Agent Compliance has been created. Once Agent Compliance reviews your dispute, an additional activity will appear on the agent's desktop about their decision.</p>

Resources

Resources

Agents should always consult the applicable underwriting manuals when submitting a risk. To assist agents, Citizens has also prepared the following resources:

Required Document Guides

Required Document Guides are available for all Personal Lines policy types.

PR-M Required Document Guides:

DP-1 & DP-3	HO-8
DP-1 & DP-3 Tenant & Condo	MDP-1
HO-3	MDP-1 Tenant
HO-4	MHO-3
HO-6	MHO-4

PR-W Required Document Guides:

DW-2	HW-6
HW-2	MD-1
HW-4	MW-2

Product Guides

Product Guides assist agents in prequalifying a risk, determining the appropriate policy form and if any additional documentation is needed based on age and/or occupancy:

- Home/Dwelling Owners (Wind)
- Renters (Multiperil, Wind)
- Home Condition Requirements Guide

FAQs

Citizens maintains an FAQs database to provide agents with the answers and information they need as quickly as possible.

To find answers related to performance or late-submission violations, log in to the *Agents* website, select **FAQs** in the top menu bar, then search on the keyword *violation*.

End