

<b>Exhibit Name : PASS Duplicate Policy</b> <b>Exhibit Number: P14-2</b> <b>RY 2023 - Comment</b>		
Seq #	Question	Explanation
1	What are duplicate policies?	<ul style="list-style-type: none"> <li>· A Duplicate Policy is defined as two or more policies where the Producer, Location State Code, Location County Code and Commodity Code are the same.</li> <li>· This means that the Tax ID and the Tax ID Type Code on the Policy Producer, "P10" record and the Location State Code, Location County Code, Commodity Code and Type Code (for Commodity Code equal to Grapes, 0052 and 0053 in CA and AZ) from the Insurance In Force, "P14" record are the same, the policy is considered a duplicate policy or a possible duplicate.</li> <li>· Each subsequent policy submitted will be evaluated and a Duplicate Policy Code will be assigned every time a policy matching the duplicate policy is submitted. If the submitted policy is deemed a duplicate or a possible duplicate, the records will be flagged, the AIP's will receive notification via the Duplicate Policy, "P91" record and all associated records submitted will be rejected. Once the AIP's determine ownership of the policy, the duplicate policies must be removed before any related records are re-submitted for processing.</li> </ul>
2	What are different types of duplicate policies?	<p>PASS allows for several types of Duplicate Policies, each type is handled appropriately by the proper ITM System (PASS/Accounting). If any combinations of duplicate or possible duplicate policies exist, no premium or loss will be accepted for any of the policies.</p> <ul style="list-style-type: none"> <li>· <u>Duplicates:</u> <ul style="list-style-type: none"> <li>o If the submitted policies are from the same AIP with the same Entity Type, PASS will reject the duplicate policies and all dependent records.</li> <li>o If both policies are submitted in the same batch, both policies will be rejected.</li> </ul> </li> </ul>

		<ul style="list-style-type: none"><li>○ If the submitted policies are from different AIP's, PASS will accept the first policy records submitted and reject all subsequent policies. A duplicate policy warning will be issued to the company.</li></ul>
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		<p>· <u>Possible Duplicates:</u></p> <ul style="list-style-type: none"> <li>o If the submitted policies contain an Entity Type equal to:                             <ul style="list-style-type: none"> <li>§ Joint Venture, "J"</li> <li>§ Limited Liability Company, "Y"</li> <li>§ Revocable Trust, "R"</li> </ul> </li> </ul> <p>Multiple policies with the same Tax ID and Tax ID Type Code are allowed, PASS will accept the same records for the AIP or different AIP's and will issue a Possible Duplicate Policy warning to the company. Any Premium or Loss records will be accepted unless the Entity Type is Joint Venture, "J" and the Tax ID equal EIN, "2", then the Insurance In Force policy and all associated records will be rejected.</p> <ul style="list-style-type: none"> <li>o If the entity type is an:                             <ul style="list-style-type: none"> <li>§ Individual, "I"</li> <li>§ Spouse, "S"</li> <li>§ Individual Operating as a Business, "X"</li> <li>§ Joint Venture, "J"</li> <li>§ Revocable Trust, "R"</li> </ul> </li> </ul> <p>PASS will accept the policies and will issue a Possible Duplicate Policy message. PASS will accept any Premium or Loss records. These Entity Types allow use of the same Tax ID and Tax ID Type Codes.</p> <ul style="list-style-type: none"> <li>o If the entity type is a:                             <ul style="list-style-type: none"> <li>§ Corporation "C",</li> <li>§ Partnership "P"</li> </ul> </li> </ul>

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		<p>§ Non-Profit or Tax Exempt Organizations “E”</p> <p>§ Receiver or Liquidator “G”</p> <p>§ State/Local Government “H”</p> <p>§ Estate “D”</p> <p>§ Irrevocable Trust “T”</p> <p>§ Public School “A”</p> <p>Another entity type should not contain the same Tax ID or Tax ID Type Code. PASS will issue a Possible Duplicate Policy warning to the company. PASS will accept any Premium or Loss records.</p>
3	How is the owner of duplicate policies identified?	<ul style="list-style-type: none"> <li>· On original submission of the policy:                             <ul style="list-style-type: none"> <li>o The first policy submitted is considered to be the owner of the policy.</li> <li>o The first policy submitted in a different batch is determined to be the owner. All subsequent policies will be treated as duplicates.</li> </ul> </li> <li>· On subsequent submissions of the policy:                             <ul style="list-style-type: none"> <li>o When duplicate policies are submitted, PASS determines policy ownership by comparing the Insured Commodity Signature Date and the Cancellation Transfer Signed Flag from the Insurance In Force, “P14” record for the submitted policy records.</li> <li>o If a value of “Y” is submitted for the Cancellation Transfer Signed Flag found on the Insurance In Force, “P14” record, the earliest Insured Commodity Signature Date for the current sales period will determine ownership. The current sales period starts the day following the earliest Sales Closing Date for the previous Commodity Year and continues through the latest Sales Closing Date for the current Commodity Year.</li> </ul> </li> </ul>

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		o If a value of “N” is submitted for the Cancellation Transfer Signed Flag for each duplicate policy, ownership is determined by the earliest Insured Commodity Signature Date without regard to the sales period.  PASS will flag the Duplicate Database with the appropriate flag (“O” for Owner, “D” for Duplicate, or “P” for Possible Duplicate) for each record submitted.
4	What are Duplicate Policies Scenarios?	The following example will demonstrate how duplicate policies are determined : o AIP #1 – submits policy first. o AIP #2 – submits policy second. Policies are now considered possible duplicates and a warning message indicating that this is a duplicate or possible duplicate policy is returned to the company. The returned Duplicate Status Code will be either “D” for Duplicate or “P” for Possible Duplicate. The submission date/time will be retained while the policy ownership is being determined. Policy information will be retained for late reporting reasons (LRR).  The AIPs will need to work together to determine who is the proper Owner of the policy. Until the ownership issue is resolved, Acreage, “P11” records will not be accepted for these policies.
5	How are duplicate policies resolved?	Once policy ownership has been determined between the AIPs, the duplicate policies must be resolved. For example, the AIPs determine that AIP #2 is the proper Owner of the policy. AIP #1 will need to submit a Policy Delete, “P49” record. This can also be accomplished by resubmitting a Policy Producer, “P10” record without the corresponding Insurance In Force, “P14” record.

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6	How are duplicate policies reported?	<ul style="list-style-type: none"> <li>· PASS will return a Duplicate Policy, "P91" record along with the other output records for the associated batch. PASS will also return a Duplicate Policy, "P91" record to all other AIP's with policies identified as a duplicate or possible duplicate of the submitted policy.</li>   <li>· A weekly report is generated and sent to the AIP's indicating duplicate policies exist. This report contains the ID of the duplicate policy, the ID of the owner policy, and the ADM Sales Closing Date.</li> </ul>