

# Congress of the United States

## House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

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<http://oversight.house.gov>

March 18, 2020

Mr. Michael Nelson  
President and Chief Executive Officer  
Allianz Global Assistance USA  
9950 Maryland Drive  
Richmond, VA 23233

Dear Mr. Nelson:

The Subcommittee on Economic and Consumer Policy sent a letter on March 4, 2020, inviting you to testify at a hearing on March 11, 2020, to examine whether travel insurance products provide adequate coverage for consumers who cancel travel due to coronavirus. You declined to attend the hearing.

We are in a global health crisis. The Centers for Disease Control and Prevention (CDC) has issued advisories against traveling to China, Iran, South Korea, Italy, Japan, Austria, Belgium, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, Switzerland, Monaco, San Marino, United Kingdom, and Vatican City.<sup>1</sup> CDC has also issued precautions for air travel and cruises.<sup>2</sup> On March 11, 2020, the Department of State issued a Global Level 3 Health Advisory that “advises U.S. citizens to reconsider travel abroad due to the global impact of COVID-19.”<sup>3</sup>

Responsible consumers who purchased your travel insurance expect to be covered when they cancel their trips due to these coronavirus-related developments. However, reports indicate that your company is not covering the costs of coronavirus-related travel cancellations.<sup>4</sup> The Subcommittee is investigating what is causing the disconnect between what Allianz’s consumers

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<sup>1</sup> Centers for Disease Control and Prevention, *Coronavirus Disease 2019, Information for Travel* (Mar. 3, 2020) (online at [www.cdc.gov/coronavirus/2019-ncov/travelers/index.html](http://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html)).

<sup>2</sup> Centers for Disease Control and Prevention, *Coronavirus Disease 2019 (COVID-19) Travel: Frequently Asked Questions* (Mar. 3, 2020) (online at [www.cdc.gov/coronavirus/2019-ncov/travelers/faqs.html#air-cruise-travel](http://www.cdc.gov/coronavirus/2019-ncov/travelers/faqs.html#air-cruise-travel)).

<sup>3</sup> Department of State, *Global Level 3 Health Advisory—Reconsider Travel* (Mar. 11, 2020) (online at <https://travel.state.gov/content/travel/en/traveladvisories/ea/travel-advisory-alert-global-level-3-health-advisory-issue.html>).

<sup>4</sup> *Why Your Travel Insurance Might Not Cover the Coronavirus*, Vox (Mar. 4, 2020) (online at [bevox.com/the-goods/2020/3/4/21163320/travel-flight-insurance-coronavirus-coverage-cancellation](http://bevox.com/the-goods/2020/3/4/21163320/travel-flight-insurance-coronavirus-coverage-cancellation)).

think they are covered for and what you actually cover. Companies should not be profiteering off this crisis.

The Subcommittee is concerned that Allianz is not informing consumers that its standard travel insurance product does not cover claims for people who cancel their trips due to the risk of coronavirus. On March 13, 2020, Allianz's Director of Marketing and Communications, Daniel Durazo appeared on Fox Business to promote sales of travel insurance, stating that "travel insurance typically covers those cancellations when you have to cancel your trip, you can get your money back for your non-refundable prepaid deposits."<sup>5</sup> He made this statement in the middle of the coronavirus outbreak, and he appeared to convey to consumers that your products cover them for canceling their trips due to coronavirus.

Consumers face increasing uncertainty after President Trump's March 11, 2020, proclamation prohibiting large classes of individuals from entering the United States from the Schengen Area comprising much of Europe, and his March 14, 2020, proclamation extending the restriction to Ireland and the U.K.<sup>6</sup> Shortly thereafter, Acting Secretary of the Department of Homeland Security (DHS) Chad F. Wolf announced:

In the next 48 hours, in the interest of public health, I intend to issue a supplemental Notice of Arrivals Restriction requiring U.S. passengers that have been in the Schengen Area to travel through select airports where the U.S. government has implemented enhanced screening procedures.<sup>7</sup>

Consumers are concerned about being rerouted to unidentified airports upon their return to the country and facing a quarantine or isolation order when they return. Many will reasonably cancel their travel because of these concerns.

As a result of our March 4, 2020, letter and subsequent discussions, you made some minor concessions. On March 9, 2020, you issued a "coverage alert" stating that, "although not covered under most plans, we are currently accommodating claims" for medical coverage for those who are infected with coronavirus while on a trip; trip cancellation and trip interruption coverage for a customer who falls ill with coronavirus; and trip cancellation for customers who

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<sup>5</sup> *Travel Insurance Executive: Should You Still Vacation?*, Fox Business (Mar. 13, 2020) (online at <http://video.foxbusiness.com/v/6141345653001/>).

<sup>6</sup> The White House, *Proclamation—Suspension of Entry as Immigrants and Nonimmigrants of Certain Additional Persons Who Pose a Risk of Transmitting 2019 Novel Coronavirus* (Mar. 11, 2020) (online at [www.whitehouse.gov/presidential-actions/proclamation-suspension-entry-immigrants-nonimmigrants-certain-additional-persons-pose-risk-transmitting-2019-novel-coronavirus/](http://www.whitehouse.gov/presidential-actions/proclamation-suspension-entry-immigrants-nonimmigrants-certain-additional-persons-pose-risk-transmitting-2019-novel-coronavirus/)); The White House, *Proclamation on the Suspension of Entry as Immigrants and Non-Immigrants of Certain Additional Persons Who Pose a Risk of Transmitting Coronavirus* (Mar. 14, 2020) (online at [www.whitehouse.gov/presidential-actions/proclamation-suspension-entry-immigrants-nonimmigrants-certain-additional-persons-pose-risk-transmitting-coronavirus-2/](http://www.whitehouse.gov/presidential-actions/proclamation-suspension-entry-immigrants-nonimmigrants-certain-additional-persons-pose-risk-transmitting-coronavirus-2/)).

<sup>7</sup> *Airlines and Airports Wake Up to Confusion with Trump's Coronavirus Travel Ban*, Forbes (Mar. 12, 2020) (online at [www.forbes.com/sites/marisagarcia/2020/03/12/airlines-and-airports-wake-up-to-confusion-with-trumps-coronavirus-travel-ban/#49bcb7d78f30](http://www.forbes.com/sites/marisagarcia/2020/03/12/airlines-and-airports-wake-up-to-confusion-with-trumps-coronavirus-travel-ban/#49bcb7d78f30)).

purchased a plan prior to January 22, 2020, for trips to certain locations affected by the outbreak.<sup>8</sup>

These half-measures are not enough. They still leave unprotected many consumers who make reasonable travel decisions regarding the coronavirus outbreak. The Subcommittee is concerned that your policy to deny reimbursement to consumers who choose to refrain from travel to protect themselves, their families, and their communities may worsen the coronavirus pandemic. Some of these consumers, rather than lose the entire price of their trip, may travel against the advice of CDC and increase the risk of infection.

To assist the Subcommittee in its investigation, please produce by March 25, 2020, the following documents and information for each of your products and services, including trip cancellation insurance and Cancel-For-Any-Reason coverage:

1. A list reflecting the number of:
  - a. Claims for reimbursement of trip cancellations related to coronavirus, including how many of such claims are paid, denied, or pending review, how many were denied because cancellations were due to a “fear of travel,” and how many were denied because coronavirus was “foreseeable”; and
  - b. Claims for reimbursement of medical expenses related to coronavirus, including how many of such claims are paid, denied, or pending review, how many were denied because cancellations were due to a “fear of travel,” and how many were denied because coronavirus was “foreseeable”;
2. A list of each claim for reimbursement of a trip cancellation related to coronavirus that was denied, including:
  - a. The trip itinerary;
  - b. The booking date;
  - c. The date of the cancellation;
  - d. The date of the claim request; and
  - e. The reason given to the customer for denial;
3. A list of each claim for reimbursement of medical expenses related to coronavirus that was denied, including:
  - a. The trip itinerary;
  - b. The location of illness;
  - c. The type of expenses (medical care, emergency medical assistance, etc.);

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<sup>8</sup> Allianz, *U.S. Coverage Alert—2019 Novel Coronavirus (COVID-19)* (Mar. 9, 2020) (online at [www.allianztravelinsurance.com/coverage-alerts/2019-novel-coronavirus.htm](http://www.allianztravelinsurance.com/coverage-alerts/2019-novel-coronavirus.htm)).

- d. The booking date;
  - e. The date of the claim request; and
  - f. The reason given to the customer for denial; and
4. For each month between January 2015 and the present:
- a. Total sales figures;
  - b. Percentage of sales from booking websites, broken down by website;
  - c. Percentage of sales from airline websites, broken down by airline; and
  - d. Dollar value of claims paid out, broken down by type of claim (trip cancellation, trip interruption, medical, etc.).

In addition, the Subcommittee requests your appearance for a transcribed interview. Please contact the Subcommittee staff by March 23, 2020, to confirm attendance and date for the interview. The Subcommittee can make arrangements for a remote interview.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate “any matter” at “any time” under House Rule X. An attachment to this letter provides additional instructions for responding to the Committee’s request. If you have any questions regarding this request, please contact Subcommittee staff at (202) 225-5051.

Sincerely,



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Raja Krishnamoorthi  
Chairman  
Subcommittee on Economic and Consumer Policy

Enclosure

cc: The Honorable Michael Cloud, Ranking Member

## Responding to Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committees.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. The Committees' preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.
5. Documents produced in electronic format should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
  - a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
  - b. Document numbers in the load file should match document Bates numbers and TIF file names.
  - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
  - d. All electronic documents produced to the Committees should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,

INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION,  
BEGATTACH.

7. Documents produced to the Committees should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.
8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.
9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committees' letter to which the documents respond.
10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.
11. The pendency of or potential for litigation shall not be a basis to withhold any information.
12. In accordance with 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee on Oversight and Reform, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building. When documents are produced to the Committee on Financial Services, production sets shall be delivered to the Majority Staff in Room 2129 of the Rayburn House Office Building and the Minority Staff in Room 4340 of the O'Neill House Office Building. When documents are produced to the Permanent Select Committee on Intelligence, production sets shall be delivered to Majority and Minority Staff in Room HVC-304 of the Capital Visitor Center.
21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

### **Definitions**

1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a

part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.
3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
4. The term “including” shall be construed broadly to mean “including, but not limited to.”
5. The term “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; (b) the individual’s business or personal address and phone number; and (c) any and all known aliases.
7. The term “related to” or “referring or relating to,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.
8. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
9. The term “individual” means all natural persons and all persons or entities acting on their behalf.