



# The State of New Hampshire Insurance Department

21 South Fruit Street, Suite 14  
Concord, NH 03301

David J. Bettencourt  
Commissioner

Keith E. Nyhan  
Deputy Commissioner

## **BULLETIN** **Docket #INS 25-038-AB**

**TO:** All Insurance Producers Licensed in NH  
**FROM:** Commissioner David J. Bettencourt  
**DATE:** June 4, 2025  
**RE:** National Producer Number "Overrides" and Producers of Records

A handwritten signature in black ink, appearing to read "D. J. Bettencourt", written over the "FROM:" line of the bulletin.

The New Hampshire Insurance Department has received numerous consumer complaints directed at insurance producers, alleging misrepresentation of and/or fraudulent enrollment in health insurance policies. When investigating these complaints, the Department has determined that in many instances, the "producer of record" for the sale – i.e. the individual producer who signed the policy – is not the individual who spoke with and sold the policy to the consumer.

Signing an insurance application as "producer of record" when said producer has no knowledge of or has had no interaction with the consumer is a violation of NH law. Similarly, use of the NPN (National Producer Number) override function on an Enhanced Direct Enrollment ("EDE") platform for an Affordable Care Act plan violates NH law. (EDE platforms are non-governmental websites that allow intermediaries to enroll consumers in Qualified Health Plans available on the ACA Marketplace.) The NPN override function allows a producer who is not appointed with an insurer to submit an application for that insurer under the NPN of another producer.

A producer who designates themselves as the producer of record or utilizes an NPN override in such circumstances violates NH RSA 402-J:12, I (h), which may result in administrative penalties including fines and license suspension or revocation. This applies to producers writing any lines of business in New Hampshire.

The Insurance Department is ready to assist with any questions you may have. Please direct any questions on this issue to [enforcement@ins.nh.gov](mailto:enforcement@ins.nh.gov).