

**Report on Examination**

**of**

**Orlando Lutheran Towers, Inc.**

**Orlando, FL**

**as of**

**December 31, 2023**



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## **SCOPE OF EXAMINATION**

The Florida Office of Insurance Regulation (“OIR”), Life & Health Financial Oversight unit conducted a routine examination of Orlando Lutheran Towers, Inc. (“OLT”), pursuant to section 651.105, Florida Statutes. The objective of the examination was to determine the extent of compliance with the provisions of Chapter 651, Florida Statutes, Rule Chapter 69O-193, and Rule 69O-136.042, Florida Administrative Code. The examination covered the period of January 1, 2021, to December 31, 2023.

## **COMPANY HISTORY**

OLT, a Florida not-for-profit corporation, was granted a certificate of authority by the OIR to offer continuing care contracts on October 20, 1980. The organization operates the continuing care retirement community in Orlando, Florida.

OLT operates on a calendar-year basis from January 1 through December 31. As of December 31, 2023, OLT reported in its Annual Report filed with the OIR: 451 Continuing Care Units consisting of 199 Independent Living Units, 73 Assisted Living Units, 168 Skilled Nursing Units, and 11 Rental Units. At that time, there were 434 individuals reported residing at OLT. The facility reports, pursuant to a continuing care contract, 211 residents in Independent Living, 60 residents in Assisted Living, and 12 residents in Skilled Nursing. The facility also reported 151 residents without a continuing care contract.

## **SUMMARY OF FINDINGS**

### Resident Council Required Disclosures

#### Finding 1:

In one instance, pursuant to section 651.091(2)(g), Florida Statutes, OLT failed to provide documentation demonstrating that a copy of the most recent third-party financial audit was distributed to the President or Chair of the Residents' Council within 30 days after filing the Annual Report with the OIR.

#### Finding 2:

In one instance, pursuant to section 651.091(2)(g), Florida Statutes, OLT failed to provide documentation demonstrating that a copy of the full annual statement was distributed to the President or Chair of the Residents' Council within 30 days after filing the Annual Report with the OIR.

#### Finding 3:

In six instances, pursuant to section 651.091(2)(j), Florida Statutes, OLT failed to provide documentation demonstrating that a copy of each quarterly statement was delivered to the President or Chair of the Residents' Council within 30 days after the quarterly statement is filed with the OIR.

### Annual and Quarterly Filings

#### Finding 4:

In three instances, pursuant to section 651.0261(1), Florida Statutes, and Rule 69O-193.005(2), Florida Administrative Code, OLT failed to submit its quarterly report on Form OIR-A3-974 within 45 days after the end of each fiscal quarter.

### Notification to the OIR

#### Finding 5:

In seven instances, pursuant to section 651.043(2), Florida Statutes, OLT failed to provide notification to the OIR in writing or electronically notification of any changes in management within 10 business days. For each new management company or manager not employed by a management company, the provider is required to submit the information described in section 651.022(2), Florida Statutes, as well as a copy of the written management contract, if applicable.

### Financing, Refinancing, and Additional Financing

#### Finding 6:

In one instance, pursuant to section 651.019(1)(a), Florida Statutes, OLT failed to provide documentation demonstrating that a written general outline of the amount and anticipated of any new financing or refinancing, and the intended use of proceeds, was provided to the residents' council at least 30 days before the closing date of the financing or refinancing transaction.

### **MINIMUM LIQUID RESERVE**

As of December 31, 2023, OLT maintained a Minimum Liquid Reserve in accordance with the requirements of section 651.035, Florida Statutes.

## **SUMMARY OF RECOMMENDATIONS**

### Resident Council Required Documents

Findings 1, 2, and 3: The OIR recommends that OLT establish and implement adequate procedures and internal controls to ensure timely availability, distribution, and posting of reports and records to the President or Chair of the Residents' Council, in accordance with section 651.091, Florida Statutes.

### Annual and Quarterly Filings

Finding 4: The OIR recommends that OLT submit all quarterly filings within the required timeframes, in compliance with section 651.0261, Florida Statutes, and Rule 69O-193.005, Florida Administrative Code.

### Notifications to the OIR

Findings 5: The OIR recommends that OLT ensure the OIR provide timely notification and documentation to the OIR regarding changes in management personnel or companies, in compliance with Chapter 651, Florida Statutes, and Rule Chapter 69O-193, Florida Administrative Code.

### Financing, Refinancing, and Additional Financing

Finding 6: The OIR recommends that OLT ensure that a written general outline of the amount and anticipated of any new financing or refinancing, and the intended use of proceeds, is provided to the residents' council at least 30 days before the closing date of the financing or refinancing transaction, in accordance with section 651.019, Florida Statutes.

## CONCLUSION

This Report of Examination is based upon the information provided to the OIR from OLT and additional research conducted by the OIR.

The following individuals from the Florida Office of Insurance Regulation participated in the examination: Michael Rockwell, Financial Administrator; Steven Waites, Financial Specialist; Al Garabedian, Financial Specialist.

Respectfully submitted,



Carolyn M. Morgan, Director  
Life & Health Financial Oversight  
Florida Office of Insurance Regulation  
Date Signed: 10/22/25