

# **Consumer Federation of America**

# The Thousand Dollar Insurance Penalty:

How Insurance Companies' Credit Scoring and ZIP Code Rating Push Up Premiums for Safe Drivers in New York

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## **Executive Summary**

New York law requires all motorists to carry auto insurance, and, therefore, lawmakers and regulators have a special responsibility to ensure that coverage is affordable and that consumers do not experience unfair discrimination. As New York is the second most expensive auto insurance market in the nation, the compliance burden placed on low-income drivers is severe and is made substantially worse by the use of pricing models that heavily weight socioeconomic characteristics, including consumer credit history and ZIP code. The reliance on these factors increases insurance costs for financially vulnerable and historically underserved New York communities and creates a significant barrier to economic opportunity.

In this report, Consumer Federation of America (CFA) details the impact of credit information on the premiums of New Yorkers with clean driving records and illustrates how the interaction of insurers' credit scoring systems and their territorial pricing exacerbates the affordability problem and reinforces structural racism in the state. The report concludes with suggested reforms for reducing discriminatory insurance pricing and lowering costs for consumers.

<sup>&</sup>lt;sup>1</sup> "2019/2020 Auto Insurance Database Report." National Association of Insurance Commissioners, January 2023. See Table 4, "Average Expenditure."

## The Thousand Dollar Insurance Penalty

## **Background**

For many New York residents a vehicle is crucial to economic mobility. Studies show that the ability to drive increases access to jobs, education, fresh food, and recreation.<sup>2</sup> Expensive auto insurance premiums present a serious economic barrier for residents who need a vehicle to obtain better paying jobs. Even in places with adequate public transportation, many low-income families have trouble reaching employment opportunities for which they are qualified and must turn down those positions in favor of lower paying jobs with better transit access.<sup>3</sup>

Auto insurance is uniquely situated in the American economy since most states, including New York, require all drivers to maintain insurance coverage and impose stiff penalties for noncompliance. Consumers who cannot afford auto insurance but continue to drive may be fined up to \$1,500, have their driving privileges suspended, and be charged an additional fee of \$750 to restore their license. The state can also impound their vehicle or even make them serve up to fifteen days in jail. These fines and penalties are disproportionately harmful to low-income consumers who struggle to pay their bills. Consumers who cannot afford coverage must choose between not driving and driving illegally without insurance. When New Yorkers drive without coverage they are vulnerable if they are involved in a crash, and so are the drivers they might hit. Insurers do not bear this risk, as the cost of uninsured drivers is passed on to other motorists through higher premiums.

In light of auto insurance's unique qualities, including the mandatory purchase requirement and its impact on the economic well-being of New York residents, public policy should encourage and ensure insurance affordability for consumers. Special attention should be paid to practices and policies that perpetuate systemic bias or particularly harm the state's most financially vulnerable residents.

In many neighborhoods in New York auto insurance is extremely costly and puts enormous strains on household budgets, competing with other essential expenses such as rent, groceries and health care. A 2017 report published by the Federal Insurance Office revealed that 5.2 million New Yorkers (26.7% of the state's residents) live in ZIP Codes where basic liability coverage is unaffordable. This was the largest number of residents in any state who lived in

<sup>&</sup>lt;sup>2</sup> "Subsidizing Car Ownership for Low-Income Individuals and Households." By NJ Klein. *Journal of Planning Education and Research*. September 2020. doi:10.1177/0739456X20950428.

<sup>&</sup>lt;sup>3</sup> "Access to Opportunity Through Equitable Transportation: Lessons from Four Metropolitan Regions." Urban Institute. October 2020. Available at <a href="https://www.urban.org/sites/default/files/publication/102992/access-to-opportunity-through-equitable-transportation\_0.pdf">https://www.urban.org/sites/default/files/publication/102992/access-to-opportunity-through-equitable-transportation\_0.pdf</a>.

<sup>&</sup>lt;sup>4</sup> New York VAT Code Title 3 Art. 6 §318-319. Accessed on February 14th, 2023. Available at <a href="https://www.nysenate.gov/legislation/laws/VAT/319">https://www.nysenate.gov/legislation/laws/VAT/319</a>.

communities where state-mandated minimum auto insurance coverage was deemed unaffordable.<sup>5</sup>

#### **Credit Information as a Factor in Auto Insurance Pricing**

Auto insurance rates reflect the overall amount that insurance companies anticipate needing to cover claims, as well as what is needed to cover their expenses and achieve their target profit. Individual consumers' premiums vary to reflect the "rating factors" that insurance companies use to increase or decrease the cost of insurance charged to drivers. Good drivers, for example, should expect to pay lower premiums than drivers with a history of accidents or significant violations. However, auto insurers use a series of non-driving factors reflecting socioeconomic characteristics of individuals that tend to penalize low-income drivers and people of color even when those customers have unblemished driving records. One of the most heavily weighted of these non-driving factors is consumer credit information, in the form of credit-based insurance scores.

New York, along with 47 other states plus the District of Columbia, allows credit information to be used in auto insurance pricing and underwriting. (California, Hawaii, and Massachusetts prohibit its use.) This factor is usually applied as a credit-based insurance score that insurers argue is predictive of claims activity. Precise formulas for calculating credit scores and the credit-based insurance scores used for rating auto insurance are generally not public, but scoring firm FICO has provided a broad description of how its scores are calculated. According to FICO, its traditional credit score is built as follows:

- Payment history (35%)—the presence or lack of harmful information, such as late payments, bankruptcy, liens, settlements, judgments, repossessions, foreclosures;
- Debt burden/amounts owed (30%)—debt specific measurements like debt to limit ratio, number of accounts with balances, amount owed across different kinds of accounts, amount paid on installment loans;
- Length of credit history (15%)—average age of the accounts in a credit report, and the age of the oldest account;
- Types of credit (10%)—consumer finance, mortgage, installment, credit cards, etc.; and
- New credit and recent searches for credit (10%)—hard credit inquiries or "pulls."

<sup>&</sup>lt;sup>5</sup> "Study on the Affordability of Personal Auto Insurance." Federal Insurance Office, U.S. Department of the Treasury. January 2017 Available at:

 $<sup>\</sup>frac{https://home.treasury.gov/system/files/311/FINAL\%20Auto\%20Affordability\%20Study\ web.pdf}{ata\ available\ at:\ http://consumerfed.org/wp-content/uploads/2017/01/FINAL-Data-for-2016-FIO-US-Auto-Affordability-Analysis-1.xlsx}.$ 

See also: "New Treasury Report Reveals that 8 Million Americans in NY-NJ-CT Live in Zip Codes Where Auto Insurance is Unaffordable." Consumer Federation of America, January 23<sup>rd</sup>, 2017. Available at: <a href="https://consumerfed.org/press-release/new-treasury-dept-report-reveals-8-million-americans-ny-nj-ct-live-zip-codes-auto-insurance-unaffordable/">https://consumerfed.org/press-release/new-treasury-dept-report-reveals-8-million-americans-ny-nj-ct-live-zip-codes-auto-insurance-unaffordable/</a>.

Notably, FICO's credit-based insurance score is virtually identical at this level of detail, with only a slightly different emphasis on certain elements. <u>A FICO insurance score is built as follows:</u>

- Previous credit performance—40%
- Current level of indebtedness–30%
- Length of credit history–15%
- New credit/pursuit of credit-10%
- Types of credit used–5%

## **Credit Information's Impact on New York Auto Insurance Rates**

Using auto insurance premium data from August 2020 for every New York ZIP code from ten New York insurers, including the four largest carriers in the state, CFA found that New York drivers pay significantly higher auto insurance premiums if they have fair or poor credit, even if their driving records are perfect.<sup>6</sup> New York drivers with a perfect driving record and **excellent** 

Safe drivers in New York pay a \$1,367 auto insurance penalty for having poor credit. **credit** pay a weighted average annual statewide premium of \$730.<sup>7</sup> But drivers with the same perfect driving record and **fair credit** pay an average premium of \$1,148, or 57% more. Drivers with **poor credit** pay \$2,097—a 187% increase compared to drivers with excellent credit. That is a \$1,367 penalty on safe drivers due to their credit-based insurance score.

Table 1 below shows the average auto insurance premiums charged for minimum limits coverage by several of New York's largest auto insurers based on consumers' credit information.

<sup>&</sup>lt;sup>6</sup> CFA purchased the data from Quadrant Information Services in fall 2020. The data used insurers' rate plans filed with each state to calculate the premium of a 35-year-old unmarried driver, both male and female, with no accidents, moving violations, license suspensions, lapses in coverage, or claims filed, and who has a high school diploma and rents their home. They drive a 2011 Honda Civic LX and have a 12-mile commute, five days a week, for 12,000 miles driven annually. Finally, the drivers purchase the state minimum insurance coverage.

<sup>&</sup>lt;sup>7</sup> The average premiums are weighted by the market share of each company's insurance group in New York.

**Table 1: Statewide Annual Auto Insurance Premiums By Insurer and Credit Information** 

Auto Insurer	<b>Excellent Credit</b>	Excellent Credit Fair Credit		
Adirondack Insurance Exchange	\$650 \$1,200		\$2,344	
Allmerica Financial Alliance Insurance Company	\$719	\$1,280	\$3,545	
Allstate Fire & Casualty Insurance Company	\$1,107	\$1,813	\$2,450	
Erie Insurance Company	\$623	\$981	\$1,853	
GEICO General Insurance Company	\$721	\$928	\$1,320	
New York Central Mutual Fire Insurance Company	\$911	\$1,528	\$2,531	
Progressive Casualty Insurance Company	\$242	\$756	\$3,776	
State Farm Mutual Auto Insurance Company	\$755	\$1,241	\$2,051	
Travelers Personal Insurance Company	\$930	\$1,547	\$2,524	
USAA Casualty Insurance Company	\$536	\$649	\$915	
Unweighted Average	\$719	\$1,192	\$2,331	
Weighted Average	\$730	\$1,148	\$2,097	

Table 2 lays out the average auto insurance premium percentage increases charged by companies, for drivers with fair credit and drivers with poor credit.

**Table 2: Auto Insurance Premiums by Insurer and Credit Information-Percentage Increase** 

Auto Insurer	Percentage Increase—Excellent Credit to Fair Credit	crease—Excellent Increase—Fair Credit to Fair Credit to Poor		
Adirondack Insurance Exchange	85% 95%		261%	
Allmerica Financial				
Alliance Insurance	78%	177%	393%	
Company				
Allstate Fire &	C40/	250/	121%	
Casualty Insurance Company	64%	35%		
Erie Insurance	58%	89%	197%	
Company	3070	0970	19770	
GEICO General Insurance Company	29%	42%	83%	
New York Central				
Mutual Fire	68%	66%	178%	
<b>Insurance Company</b>				
Progressive				
Casualty Insurance	212%	400%	1,458%	
Company State Farm Mutual				
Auto Insurance	64%	65%	172%	
Company				
Travelers Personal Insurance Company	66%	63%	171%	
USAA Casualty Insurance Company	21%	41%	71%	
Unweighted Average	66%	95%	224%	
Weighted Average	57%	83%	187%	

With each company, the premiums presented assume that the quoted drivers are exactly the same but for their credit history. In each test case, all drivers have perfect records—with no tickets, crashes, or claims filed.

As the data show, the use of credit information in insurance pricing results in severe premium hikes for drivers, who pay hundreds or even thousands of dollars more to comply with the state's

insurance mandate solely because of their credit-based insurance score. Aside from recognizing the sheer impact of the use of credit, it is important to note that low and declining credit scores can reflect many different circumstances and factors – including loss of a job, unexpected and large medical expenses, lingering effects of the COVID-19 pandemic's economic upheaval, historic barriers to financial products, bias in scoring models, and errors in the credit reporting data, among others. On those grounds alone, it is troubling enough that these personal financial challenges and systemic problems lead to New Yorkers paying much higher insurance premiums even when they have pristine driving records. But other research reviewing the relationship between credit and driving record reveals that the market is even more dramatically unfair.

In 2015, *Consumer Reports* conducted its own study of auto insurance premiums charged to consumers based on their credit information. The study examined premiums charged to unmarried adult drivers with a perfect driving record and excellent, good, or poor credit, and it also examined premiums charged to drivers based on their driving history. The graphic below demonstrates what *Consumer Reports* found: astonishingly, New York drivers with poor credit and a clean driving record were charged \$589 more on average than drivers with excellent credit and a conviction of driving under the influence of alcohol.

<sup>&</sup>lt;sup>8</sup> "The Secret Score Behind Your Rates." Consumer Reports. July 30, 2015. Available at <a href="https://www.consumerreports.org/cro/car-insurance/credit-scores-affect-auto-insurance-rates/index.htm">https://www.consumerreports.org/cro/car-insurance/credit-scores-affect-auto-insurance-rates/index.htm</a>.

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# Insurance Costs by Credit Score

Rates shown are the average new-customer premium for adult single drivers with a clean driving record and poor, good, or excellent credit. We compare these to the average premium for a driver with excellent credit and a driving while intoxicated (DWI) conviction.



It is illogical and deeply unfair for auto insurers to impose a greater surcharge on a policyholder for poor credit than is imposed on a customer with a drunk driving conviction on their record.

## **Territorial Pricing Exacerbates Credit-Based Discrimination**

Statewide data show that New York consumers with poor credit pay an average of \$1,367 more for auto insurance compared to consumers with excellent credit, even if both customers have perfect driving records. However, that figure understates the burden created by insurance credit scoring on many of the state's lowest income communities, and particularly on people of color who continue to face significant pricing disparities based on the ZIP code in which they live. In many New York cities, consumers with poor credit pay several thousands of dollars more in premiums every year than they would if they had excellent credit. While communities throughout the state generally see the same *percentage* increase imposed on safe drivers with worse credit – this is because the credit-based rating factor is imposed independent of territory for all customers – the very high baseline premium charged in the state's urban communities means the credit penalty has a much more severe impact for lower-credit customers when measured in dollars. And, of course, people pay rent and buy food in dollars, not percentages.

As Table 3 documents, Brooklyn drivers experience some of the most severe impacts of having low credit. New Yorkers hailing from Brooklyn pay a market share weighted average premium of \$1,861 if they also have excellent credit. But if they only have fair credit, the cost of coverage jumps by \$1,185 to \$3,046 per year. Borough residents with a perfect driving record but poor credit pay an average premium of \$5,971. That is, the price of basic auto insurance in Brooklyn jumps \$4,110 on average for good drivers solely because their credit history is poor.

Table 3: Average Auto Insurance Premiums In New York City Boroughs Based on Credit Information

Borough	Consumers With Excellent Credit	Consumers With Fair Credit	Consumers With Poor Credit	
The Bronx	\$1,666	\$2,694	\$5,269	
Brooklyn	\$1,861	\$3,046	\$5,971	
Manhattan	\$1,141	\$1,901	\$3,743	
Queens	\$1,600	\$2,619	\$5,152	
Staten Island	\$1,253	\$2,037	\$3,944	

Importantly, there is not a smooth distribution of credit scores among consumers living throughout the state. Lower-income, urban communities of color, which face some of the highest premiums in the state due to geography, also tend to have residents with lower average credit scores and higher incidence of subprime credit than wealthier white suburban communities. This means that the disparities of credit-based insurance scores are magnified by the disparities created by the territorial rating common among the state's insurers, as further illustrated later in Table 5.

Credit-based increases with large dollar amounts, including those above a thousand dollars per year, are not limited to New York City. Table 4 shows penalties throughout the state, with Long Island's poor credit residents paying \$2,277 more than their high credit neighbors. In Buffalo, where the per capita income is \$27,157,<sup>10</sup> low-credit drivers face credit-based hikes of \$1,433 and an average premium that is more than 8% of city's average income.

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<sup>&</sup>lt;sup>9</sup> While focused on Midwest cities and suburban communities, the Federal Reserve Bank of Chicago's 2019 report "The Geography of Subprime Credit" highlights this fact. "We find geographic patterns in the locations of subprime-scored households, in particular that these households are more highly concentrated in urban centers, while suburban areas tend to have very few subprime households...We also find significant differences in neighborhood characteristics in places where subprime-scored households live, including a much higher non-white share of the population, weaker labor market outcomes, lower educational attainment, and higher housing vacancy rates." Available at <a href="https://www.chicagofed.org/publications/profitwise-news-and-views/2019/the-geography-of-subprime-credit">https://www.chicagofed.org/publications/profitwise-news-and-views/2019/the-geography-of-subprime-credit</a>.

<sup>&</sup>lt;sup>10</sup> United States Census Bureau. QuickFacts on Buffalo, New York. Accessed on February 9th, 2023. Available at <a href="https://www.census.gov/quickfacts/fact/table/buffalocitynewyork,rochestercitynewyork/INC110221">https://www.census.gov/quickfacts/fact/table/buffalocitynewyork,rochestercitynewyork/INC110221</a>.

**Table 4: Discrimination in New York Cities** and Regions Based on Credit Information

City/Region	Average Premium Charged to Consumers With Excellent Credit	Average Premium Charged to Consumers With Fair Credit	Average Premium Charged to Consumers With Poor Credit
Albany	\$568	\$866	\$1,486
Buffalo	\$826	\$1,292	\$2,259
Long Island	\$1,073	\$1,727	\$3,350
Plattsburgh	\$453	\$678	\$1,135
Poughkeepsie	\$731	\$1,140	\$2,017
Rochester	\$551	\$852	\$1,445
Syracuse	\$594	\$918	\$1,584

### **Auto Insurance Discrimination Reinforces and Perpetuates Systemic Racism**

Auto insurers' use of credit information disproportionately harms African American and Latino consumers. Due to past and present discrimination in financial markets and other structural biases in credit-scoring methodologies, African American and Latino consumers are more likely to have fair or poor credit and lower overall credit scores. <sup>11</sup> Data from the U.S. Census Bureau 2018 American Community Survey found that 5.4% of white Americans have a credit score below 620 (meaning a significant penalty) but 21.3% of African Americans have a credit score below 620. Census Bureau data also showed that the average credit score for white Americans is 734, while the average credit score for African Americans was 677. <sup>12</sup> Latinos experience similar discrimination; 11.2% of Latinos have a credit score below 620 and their average credit score is 701. The Urban Institute has reported that in New York State, 16% of state residents have a subprime credit score, but 22.4% of New Yorkers living in communities of color have a subprime score compared to 12.4% of New Yorkers living in white communities. <sup>13</sup>

<sup>&</sup>lt;sup>11</sup> "From Inherent Racial Bias to Incorrect Data—The Problems With Current Credit Scoring Models." By Natalie Campisi. Forbes. February 26, 2021. Available at <a href="https://www.forbes.com/advisor/credit-cards/from-inherent-racial-bias-to-incorrect-data-the-problems-with-current-credit-scoring-models/">https://www.forbes.com/advisor/credit-cards/from-inherent-racial-bias-to-incorrect-data-the-problems-with-current-credit-scoring-models/</a>.

<sup>&</sup>lt;sup>12</sup> "Systemic Racism in Auto Insurance Exists and Must Be Addressed by Insurance Commissioners and Lawmakers." Consumer Federation of America. June 17, 2020. Available at <a href="https://consumerfed.org/press">https://consumerfed.org/press</a> release/systemic-racism-in-auto-insurance-exists-and-must-be-addressed-by-insurance-commissioners-and-lawmakers/.

<sup>&</sup>lt;sup>13</sup> Urban Institute, Credit Health During the Covid-19 Pandemic, estimates as of August 2021, available at: <a href="https://apps.urban.org/features/credit-health-during-pandemic/">https://apps.urban.org/features/credit-health-during-pandemic/</a>.

When analyzing territorial rating through the lens of ZIP code demographics, the "double whammy" of the use of credit and ZIP Code reveals the unfair discrimination most acutely. Recalling the discussion of territorial pricing above, in which we reviewed the impact of geography at the city level, Table 5 below presents a more granular approach that highlights the effect of the confluence of higher levels of subprime credit in communities of color and the higher baseline premiums stemming from ZIP Code pricing.

Table 5: Auto Insurance Premiums in New York Based on ZIP Code Demographics

ZIP Code Demographics	# of ZIP Codes	Average Premium	Premium with Excellent Credit	Premium with Fair Credit	Premium with Poor Credit
Majority White	1,514	\$1,152	\$647	\$1,006	\$1,803
Majority People of Color	210	\$2,529	\$1,314	\$2,131	\$4,141
Majority Black	41	\$3,027	\$1,564	\$2,543	\$4,975
Majority Latino	32	\$3,056	\$1,573	\$2,554	\$5,042
Total Statewide Average	1,724	\$1,325	\$730	\$1,148	\$2,097

In short, drivers living in New York's predominantly Black and Latino ZIP codes and its most diverse communities pay thousands of dollars more for basic auto insurance compared to those living in the state's predominantly white communities, even before accounting for credit differences. That disparity only grows wider when considering the disproportionate levels of lower credit in communities of color.

## Reform is Needed to Address Systemic Harms in New York's Auto Insurance Market

Auto insurance pricing should serve to incentivize safety and risk reduction. It should focus on drivers' responsibility behind the wheel, signaling to policyholders the importance of safe driving and the consequences of dangerous driving. Pricing should not be a means of segmenting consumers according to social and economic status and it should not be disproportionately harmful to consumers based on protected classes such as race, income, and gender. Though used by many if not most insurers, credit information does not meet these critical tests. The use of credit, especially when coupled with the severe ZIP code pricing in the state, produces the

intense premium pain felt by low- and moderate-income New Yorkers and, particularly, people of color trying to maintain compliance with the state's mandatory auto insurance law.

While insurers allege a correlation between customers' credit and the likelihood of a claim, no one suggests it speaks to an individual driver's actual safety on the road. Furthermore, the overwhelming burden that its use disproportionately places on financially vulnerable and historically underserved residents of New York must be recognized and addressed. As policymakers and regulators consider this, it is important to highlight that insurers currently operate in three states – California, Hawaii, and Massachusetts – without any distinction between customers based on their credit. In each of those states the average expenditure on insurance statewide is significantly lower than that of New York. Notably, according to a 2019 calculation of the Herfindahl-Hirschman Index (HHI), which measures market concentration, for each state's auto insurance market, each of these three states were more competitive than New York. These states' experience provide evidence that, with appropriate supervision by the Department of Financial Services (DFS), insurers could recraft their pricing algorithms to remove the use of credit.

Addressing a similar problem in auto insurance pricing – albeit with less of an impact on premiums – in December 2017, DFS issued a regulation that largely eliminated the use of consumers' education levels and occupations in auto insurance pricing, allowing it only if insurance companies demonstrated that their use of these factors did not result in unfairly discriminatory rates. <sup>16</sup> After implementation of the rule, several large insurers, including GEICO, the state's market leader, rewrote the pricing models to eliminate the use of these socioeconomic factors.

#### Recommendations

In order to make the auto insurance market more affordable and equitable for New Yorkers, we recommend that the New York DFS, the Legislature, and the Governor's Office work to implement the following reforms that will address the intersecting problems addressed in this report and build long-term protections against other industry strategies and models that might perpetuate unfair discrimination in auto insurance:

<sup>&</sup>lt;sup>14</sup> National Association of Insurance Commissioners, January 2023. 2019/2020 Auto Insurance Database Report. Table 4. In 2020, auto insurance expenditures in Massachusetts were 19% lower than New York, California 27% lower, and Hawaii 44% lower. While New York has higher minimum coverage requirements than the other states, all of them have greater traffic density (Table 34) and California and Massachusetts have a larger share of population in Metro Areas than New York. (Table 36)

<sup>&</sup>lt;sup>15</sup> Hunter, J.R., Heller, D., 2/11/2019. Auto Insurance Regulation: What Works 2019. Appendix 3.

<sup>&</sup>lt;sup>16</sup> "DFS Announces Final Regulation and Agreements With Two Major Insurers to Protect New York Drivers From Unfairly Discriminatory Auto Insurance Rates." New York Department of Financial Services. December 13th, 2017. Available at <a href="https://www.dfs.ny.gov/reports">https://www.dfs.ny.gov/reports</a> and <a href="publications/press">publications/press</a> releases/pr1712131.

- Prohibit auto insurers from using customer credit history in the underwriting or pricing of insurance products and require the reconfiguration of rating algorithms to be based on driving safety record and other driving related characteristics of policyholders.
- In advance of implementation of a ban on the use of credit, DFS should require that all credit-based insurance scoring models be revised to ensure that the impact of credit history on drivers' premiums never exceeds the impact of at-fault crash history, drunk driving convictions, or other evidence of reckless driving.
- Territorial pricing should be reformed to diminish the effect of living in a particular ZIP Code, census tract, or other small geographic unit. There are several approaches to this that still allow for differences in premiums that reflect regional differences in risk; policymakers and regulators should work to identify the best strategies for diminishing the legacy of redlining on New York drivers.
- Policymakers should adopt algorithmic bias testing, similar to legislation enacted in Colorado in 2021, that will require insurers to demonstrate that their use of data and models in all aspects of insurance – marketing, underwriting, rating, claims handling, and fraud fighting – do not disproportionately harm people of color or customers based on any other protected class. This reform is critically important to ensure, especially with the increasing reliance on big data and artificial intelligence, that insurance practices, even after credit is removed, do not reproduce systemic biases through new tools.

New York should adopt sweeping reforms to end the use of credit information in auto insurance, lower costs for consumers, and make auto insurance more accessible for good drivers.

#### **Appendix: ZIP Codes Included in Various City and Neighborhood Calculations**

For calculations of average auto insurance premiums in boroughs and cities based on the premium data acquired from Quadrant, Consumer Federation of America used the following ZIP codes:

**The Bronx:** 10451, 10452, 10453, 10454, 10455, 10456, 10457, 10458, 10459, 10460, 10461, 10462, 10463, 10464, 10465, 10466, 10467, 10468, 10469, 10470, 10471, 10472, 10473, 10474, 10475.

**Brooklyn:** 11201, 11203, 11204, 11205, 11206, 11207, 11208, 11209, 11210, 11211, 11212, 11213, 11214, 11215, 11216, 11217, 11218, 11219, 11220, 11221, 11222, 11223, 11224, 11225, 11226, 11228, 11229, 11230, 11231, 11232, 11233, 11234, 11235, 11236, 11237, 11238, 11239, 11241, 11242, 11243, 11249, 11252, 11256.

Manhattan: 10001, 10002, 10003, 10004, 10005, 10006, 10007, 10009, 10010, 10011, 10012, 10013, 10014, 10016, 10017, 10018, 10019, 10020, 10021, 10022, 10023, 10024, 10025, 10026, 10027, 10028, 10029, 10030, 10031, 10032, 10033, 10034, 10035, 10036, 10037, 10038, 10039, 10040, 10041, 10045, 10055, 10060, 10065, 10069, 10075, 10090, 10095, 10103, 10104, 10105, 10106, 10107, 10110, 10111, 10112, 10115, 10118, 10119, 10120, 10121, 10122, 10123, 10128, 10151, 10152, 10153, 10154, 10155, 10158, 10161, 10162, 10165, 10166, 10167, 10168, 10169, 10170, 10171, 10172, 10173, 10174, 10175, 10176, 10177, 10178, 10199, 10270, 10271, 10278, 10279, 10280, 10281, 10282.

Queens: 11101, 11102, 11103, 11104, 11105, 11106, 11109, 11351, 11354, 11355, 11356, 11357, 11358, 11359, 11360, 11361, 11362, 11363, 11364, 11365, 11366, 11367, 11368, 11369, 11370, 11371, 11372, 11373, 11374, 11375, 11377, 11378, 11379, 11385, 11411, 11412, 11413, 11414, 11415, 11416, 11417, 11418, 11419, 11420, 11421, 11422, 11423, 11426, 11427, 11428, 11429, 11430, 11432, 11433, 11434, 11435, 11436, 11439, 11451, 11691, 11692, 11693, 11694, 11697.

**Staten Island:** 10301, 10302, 10303, 10304, 10305, 10306, 10307, 10308, 10309, 10310, 10311, 10312, 10314.

**Albany:** 12202, 12203, 12204, 12205, 12206, 12207, 12208, 12209, 12210, 12211, 12222, 12223, 12226, 12260.

**Buffalo:** 14201, 14202, 14203, 14204, 14206, 14207, 14208, 14209, 14210, 14211, 14212, 14213, 14214, 14215, 14216, 14217, 14218, 14219, 14220, 14221, 14222, 14223, 14224, 14225, 14226, 14227, 14228, 14260, 14261.

**Long Island:** 6390, 11001, 11003, 11010, 11020, 11021, 11023, 11024, 11030, 11040, 11042, 11050, 11096, 11501, 11507, 11509, 11510, 11514, 11516, 11518, 11520, 11530, 11542, 11545, 11548, 11549, 11550, 11552, 11553, 11554, 11556, 11557, 11558, 11559, 11560, 11561, 11563, 11565, 11566, 11568, 11569, 11570, 11572, 11575, 11576, 11577, 11579, 11580, 11581, 11590, 11596, 11598, 11599, 11701, 11702, 11703, 11704, 11705, 11706, 11709, 11710, 11713, 11714,

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Plattsburgh: 12901, 12903, 12962.

Poughkeepsie: 12601, 12603, 12604.

**Rochester:** 14604, 14605, 14606, 14607, 14608, 14609, 14610, 14611, 14612, 14613, 14614, 14615, 14616, 14617, 14618, 14619, 14620, 14621, 14622, 14623, 14624, 14625, 14626, 14627. Syracuse: 13202, 13203, 13204, 13205, 13206, 13207, 13208, 13209, 13210, 13211, 13212, 13214, 13215, 13219, 13224, 13244, 13290.