

September 17th, 2025

Michael Yaworsky, Chair
Homeowners Insurance Market Data Call Task Force
National Association of Insurance Commissioners

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Re: Revised Homeowners Insurance Data Call Template and Data Call
Definitions

The Consumer Federation of America (CFA)¹ submits these comments on the revised Homeowners Insurance Market Data Call template and definitions, urging the collection of additional property insurance information and the release of this information so it is publicly available. We applaud the proposed expansions to collect information on insurance policies other than for single family homes and offer suggestions on how to further strengthen the data call.

We thank the Drafting Group and Property and Casualty (C) Committee for their focus on collecting data and determining the extent of rising insurance costs, and their impact on consumers, by conducting this data call. CFA is pleased to see the proposed revisions that expand and improve the data call by incorporating new fields and including more policy forms. Insurance policies for renters (HO-4), condominium owners (HO-6), and mobile homes (HO-7) are critically important and often overlooked, despite the fact that these consumers are often more vulnerable to price increases and other problems. For example, a past CFA report on consumers who lack homeowners insurance found that owners of mobile homes are more likely to lack coverage than

¹ Founded in 1968, CFA is an association of consumer organizations that works to advance consumer interests through research, advocacy, and education. Our comments are based on decades of experience researching insurance markets, working to make insurance more affordable and accessible, and reducing risk. CFA's Director of Insurance Douglas Heller is a member of the Federal Advisory Committee on Insurance and a Board Member who helps oversee California's low-cost auto insurance program. CFA's Research and Advocacy Michael DeLong is an NAIC consumer representative and a member of the Nevada Property and Casualty Insurance Advisory Committee.

homeowners in general.² An accurate and comprehensive look at the homeowners insurance market must include these policies and the data call's inclusion of them is a big step forward.

Nevertheless, the data call can and must be improved further. It is critically important that residual market policies be included in the data call. These markets provide coverage for consumers who cannot obtain insurance through the voluntary market and there are millions of American homes covered by these policies. With so many consumers forced into these plans as private carriers retreat from some communities, information on these plans is essential for a complete picture of the insurance market. We urge that the data call include information on the following residual plans and insurance policies:

- FAIR plans, which allow high-risk homeowners to buy insurance policies
- Citizens plans, meaning the nonprofit insurers in Florida and Louisiana that provide last-resort insurance for homeowners
- Wind and beach policies, designed to protect homeowners with properties on or close to coastal waters
- Earthquake plans, which cover damage caused by earthquakes

Additionally, the data call should seek data to shed light on two other segments of the insurance market. First, we urge NAIC to collect data from insurers about the policies they underwrite for housing developers. In particular, there is an acute need for information regarding the cost and availability of policies that cover affordable housing developments. Second, the NAIC should collect information on surplus lines insurance policies serving the homeowners insurance market. These policies are sold by non-admitted carriers through licensed surplus lines brokers, carry additional risks for consumers because they are not subject to state regulatory review and are not protected by state guaranty funds. While state regulators have less authority over this market, we urge the NAIC to include surplus lines carriers in its data call.

² "Exposed: A Report on 1.6 Trillion Dollars of Uninsured American Homes." By Sharon Cornelissen, PhD, Douglas Heller, and Michael DeLong. The Consumer Federation of America. March 12, 2024. Available at <https://consumerfed.org/wp-content/uploads/2024/03/Exposed-UninsuredHomes-1.pdf>.

We strongly urge that the homeowners insurance data be collected in a manner that ensures that the data are made publicly available for policymakers, researchers, public interest advocates, and consumers in general, for multiple reasons. Collecting this data and not allowing a variety of perspectives and research techniques to investigate flies in the face of the critical need to fully understand the causes of the insurance crisis consumers are facing, and to identify ways to improve the market. Nothing in the proposed data call need be treated as confidential and the benefit of public access far outweighs insurers' preferences that the market remain opaque to the public.

It is important to note that consumers are increasingly frustrated and angry with the lack of transparency and information about rising homeowners insurance costs. Until recently, there was a severe lack of information about premium increases and homeowners had to rely largely on anecdotes and personal accounts, instead of comprehensive analysis. The situation has slightly improved, with several organizations and media outlets conducting their own studies, but there is still a serious lack of overall information. Making the homeowners insurance data public, in an easily understandable format or summary, will help inform consumers and help them make better decisions.

Consumers also need information about mitigation discounts and their effects on insurance costs. Homeowners often find it difficult or impossible to get helpful information on risk reduction efforts, the discounts or rate reductions that should follow, or even what can be done to lower costs. The revised data call proposes to collect average percentage discounts for mitigation efforts, both to determine consumer participation in mitigation programs and how these programs are reducing costs. If this information is not made public, it is of little use to homeowners. By making the mitigation discounts public, the NAIC will help homeowners to strengthen their homes and lower their premiums.

The revised Homeowners Insurance Market Data Call includes improvements over the data call collected in 2024. The NAIC should expand this revised approach by collecting the additional insurance data we have laid out, making that data publicly available, and affirming that this will be an annual data call going forward.

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Please contact us at mdelong@consumerfed.org with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Heller', with a long horizontal line extending to the right.

Douglas Heller
Director of Insurance
Consumer Federation of America

A handwritten signature in black ink, appearing to read 'Michael DeLong', written in a cursive style.

Michael DeLong
Research and Advocacy Associate
Consumer Federation of America