

March 23, 2026

Scott A. White
Virginia Insurance Commissioner
President of the National Association of Insurance Commissioners
Tyler Building,
1300 E. Main St.
Richmond, VA 23219

CC: Michael Yaworsky, Florida Insurance Commissioner, Chair, and John F. King, Georgia Insurance Commissioner, Vice Chair, Homeowners Market Data Call Task Force

Re: Homeowners Market Data Call

Dear Commissioner White,

On behalf of the undersigned consumer protection, climate, and housing justice organizations, we urge you to swiftly publish data and analysis from the property and casualty market intelligence data call on the impact of climate change on insurance affordability.

Between 2021 and 2024, property insurance premiums rose 24 percent nationwide, and early data from 2025 indicates yet another 8.5 percent increase. However, through the first nine months of 2025 insurance companies recorded an underwriting profit of \$35.3 billion—far above the \$4 billion result at the same point the year prior. This continues the trend from 2024, in which insurers recorded a 90 percent increase in profits from 2023 and a 333 percent jump from 2022.

As the costs of the climate crisis are mounting, these rising insurance prices and retreating insurance companies are creating an affordability crisis that threatens Americans' homes, life savings, and the economies of already vulnerable regions. Given the speed at which an insurance crisis is unfolding, comprehensive national data and analysis must be an urgent priority.

Communities across the country are already experiencing the impacts of rising insurance costs and withdrawal. Due to the disproportionate exposure to wildfires and flooding, low-income communities and communities of color are particularly at risk from insurance hikes and withdrawals. Yet the current absence of publicly available data on insurance premiums and claims impedes regulators, municipalities, researchers, and community organizations from monitoring trends, assessing economic impacts, providing analysis, and proposing solutions.

While the National Association of Insurance Commissioners are taking an important step by collecting data, *publishing* the data is necessary to evaluate the full scale of the crisis and ensure all relevant actors can understand and act accordingly to mitigate the risk in their

jurisdiction. We urge the NAIC to publish an analysis of data on property insurance. We further call on each insurance commissioner to commit to the same.

Sincerely,

National Organizations

Americans for Financial Reform
Center for Climate Integrity
Climate Defenders
Consumer Federation of America
Consumer Watchdog
Extreme Weather Survivors
Green America
Hip Hop Caucus
National Community Reinvestment Coalition (NCRC)
Natural Resources Defense Council
Public Citizen
Rainforest Action Network
Revolving Door Project
The American Policyholder Association
The Greenlining Institute
U.S. PIRG
Union of Concerned Scientists
Unlocking America's Future

California Organizations

1000 Grandmothers for Future Generations
Consumer Federation of California
Eaton Fire Survivors Network
Housing and Economic Rights Advocates
Rise Economy
Strategic Actions for a Just Economy (SAJE)
The Phoenix Group
Third Act SoCal

Connecticut Organizations

Connecticut Citizen Action Group
Citizens' Climate Lobby Connecticut
Connecticut Coalition for Economic and Environmental Justice

Florida Organizations

Affordable Homeownership Foundation Inc.
Earth Ethics, Inc.

Hawai'i Organizations

350Hawaii

Hawaiian Council

Our Hawai'i

Polluters Pay Hawaii

Indiana Organizations

Fair Housing Center of Central Indiana

Louisiana Organizations

For a Better Bayou

HousingNOLA

Louisiana Just Recovery Network

Micah Six Eight Mission

Massachusetts Organizations

Massachusetts Affordable Homeownership Alliance

New York Organizations

350Brooklyn

The Center for NYC Neighborhoods, Inc.

Third Act Upstate New York

Oregon Organizations

Oregon Consumer Justice

Texas Organizations

Freeport Haven Project

Washington Organizations

350 Yakima Climate Action