

June 11, 2026

Commissioner Grant (MD), Chair
NAIC Homeowners Market Report (C) Working Group
c/o Aaron Brandenburg, Assistant Director, P&C Regulatory Services
Via email abrandenburg@naic.org

Re: Interest Party Recommendations on Metrics for a Public Homeowners Insurance Report

Dear Commissioner Grant and Members of the Working Group:

On behalf of our members, the National Association of Mutual Insurance Companies (NAMIC), please accept the attached recommendations regarding what data elements from the homeowners market data call, and what related metrics, should be included in a public report. These comments are offered in response to the Working Group's request for interested party feedback on which metrics would be most meaningful for public reporting, why those metrics matter, and what questions they are capable of answering.

The recommendations urge a focused and disciplined reporting framework built around several core pillars: market size and structure, affordability, availability, loss experience, mitigation, and broader solvency context. The intent is to promote a public report that is clear, credible, and analytically useful to regulators, policymakers, consumers, and market participants alike.

A central theme of the recommendations is that the public report should emphasize risk-aware and coverage normalized metrics. Measures such as premium per 1,000 dollars of Coverage A, deductible distributions, nonrenewal rates, peril-specific loss ratios, claims closed without payment, and mitigation discount uptake can provide meaningful insight only when presented in a way that reflects differences in exposure, coverage design, and hazard.

The recommendations also encourage the Working Group to pair data-call metrics with a limited set of contextual indicators drawn from existing NAIC reports, Annual Statement information, and other established public sources where appropriate. All reported metrics should be based solely on appropriately aggregated and anonymized data, without disclosure of company or policy level detail. That approach can help explain market conditions without overcomplicating the report or obscuring the core value of the data call itself.

Just as important, the recommendations caution against selecting or framing statistics in a manner designed to hobby horse a preferred opinion or political point of view. The report will be most useful if it is grounded in a consistent set of transparent metrics and allows the data to speak for itself, rather than being used to validate a preselected narrative.



A public report constructed in that manner can better inform discussion around affordability, availability, market stress, and resilience, while preserving confidence in the neutrality and integrity of the Working Group's work.

As the Working Group continues its efforts, these comments and recommendations are intended to assist in structuring a focused, data-driven public homeowners reports. NAMIC looks forward to continuing to participate in this process and to serving as a resource on homeowners market data and reporting.

Sincerely,

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