NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Memorandum

To: Homeowners Market Data Call (C) Task Force
From: Homeowners Market Data Call Drafting Group
Date: October 13, 2026
Subject: Proposed Enhancements to the Homeowners Market Data Call for the 2027 Data Collection

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Purpose
The Homeowners Market Data Call Drafting Group has identified several potential enhancements and clarifications to the Homeowners Market Data Call (HMDC) for the 2027 data collection cycle. These recommendations are intended to improve data quality, increase consistency across reporting entities, and provide regulators with more actionable information regarding homeowners insurance market conditions, underwriting practices, and catastrophe exposure.

Background Information

The 2026 HMDC saw numerous improvements over the prior Property & Casualty Market Intelligence (PCMI) Data Call issued in 2024. HMDC changed the way premiums and policies in force were reported, which led to better data as it was easier for insurers to report. HMDC also added by peril categories for claims and losses. Information on mitigation discounts was expanded and redefined.

The overall quality of data greatly improved with HMDC in 2026. Secondary validation checks led to numerous re-filings and explanations from insurers. The number of insurers was also greatly expanded, leading to each state receiving the vast majority of their homeowners market (over 90%).

The Drafting Group recommends continuing to enhance and improve definitions, particularly those having to do with mitigation discounts, as mitigation data seems to be the most difficult for insurers to file. Primary and secondary validation checks should continue to be revisited in future years.

State regulators in all participating states have access to the HMDC data in various formats via the NAIC data tools and participate in regular conference calls with NAIC staff in order to improve tools that assist with analysis. Regulators are utilizing the data for various regulatory functions and many states are considering the creation of public reports.

<u>Recommended Adjustments</u>

1. Require Reporting by All Companies Within a Group
The Drafting Group recommends requiring reporting from all companies within an insurance group rather than permitting partial group reporting. Complete group-level participation would improve the comprehensiveness of collected data and reduce the potential for inconsistencies created when only select affiliated companies report. This change would provide a more accurate representation of market activity, underwriting practices, and geographic distribution of business across insurance groups.

2. Include Surplus Lines Writers

The Drafting Group recommends expanding the data collection to include surplus lines writers participating in the homeowners market. As market conditions evolve and placement in the surplus lines market becomes more common in certain geographic areas and risk profiles, inclusion of these writers will provide a more complete picture of homeowners insurance availability and market dynamics.

3. Clarify Mitigation Discount Definitions

The Drafting Group recommends reviewing and refining mitigation discount definitions to ensure they are clearly understood and consistently reported across companies.
The current definitions may allow for differing interpretations among companies. More precise and standardized terminology would improve data reliability and enable more meaningful comparisons across jurisdictions and insurers. Clarification should address the specific mitigation measures qualifying for discounts and the reporting methodology associated with those discounts.

4. Clarify Policy Form Definitions

The Drafting Group recommends updating and expanding data definitions related to policy forms.
Clearer guidance regarding policy form classifications would reduce reporting inconsistencies and improve the comparability of data submitted by insurers. Additional explanatory language should clearly distinguish policy form types and provide examples where appropriate to ensure consistent interpretation by reporting entities.

<u>Recommended Additions</u>

The Drafting Group recommends maintaining consistency in the data call elements for the next collection cycle to support continued improvements in data quality and minimize unnecessary reporting burdens on participating companies. The data elements below are proposed for consideration as future enhancements that could strengthen overall market intelligence.

1. Collect Square Footage Buckets for Underinsurance Analysis

To support analysis of potential underinsurance trends, the Drafting Group recommends collecting dwelling square footage information using the following categories:

- 0 to 1,499 square feet
- 1,500 to 2,999 square feet
- 3,000 square feet and above

These data elements would allow regulators to evaluate whether underinsurance patterns vary by dwelling size and would support more refined assessments of replacement cost adequacy across market segments.

2. Collect Information Regarding Dog Bite Exclusions

The Drafting Group recommends adding data elements related to dog bite exclusions, including:

- Whether a dog bite exclusion is utilized
- Whether the exclusion is breed specific

Dog-related liability restrictions have become an increasingly important consumer and underwriting issue. Collecting this information would provide greater visibility into insurer underwriting practices and help assess market availability and accessibility for homeowners with dogs.

3. Collect Catastrophe Loss Data

The Drafting Group recommends collecting catastrophe loss data as part of the Homeowners Market Data Call.

The addition of catastrophe loss information would provide important insight into the relationship between catastrophe exposure, claims experience, pricing, underwriting decisions, and market availability. This information would support regulatory analysis of catastrophe impacts and emerging risk trends across states and regions.

Conclusion

The Drafting Group believes these proposed enhancements will strengthen the Homeowners Market Data Call by improving data consistency, expanding market visibility, and providing more meaningful insights into underwriting practices, catastrophe impacts, and consumer coverage issues. We respectfully submit these recommendations for the Task Force's consideration as it evaluates potential revisions for the 2027 data collection cycle.