

September 15, 2025

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VIA Electronic Mail: abrandenburg@naic.org

RE: APCIA Comments re: Homeowners Market Data Call Template and Definitions

Dear Mr. Brandenburg:

The American Property Casualty Insurance Association (APCIA)¹ appreciates the opportunity to provide comments on the Homeowners Market Data Call (C) Task Force's revised Data Call Template and Data Call Definitions.

APCIA recognizes the amount of work the Task Force has done in further developing the revised template and definitions and wants to be a collaborative partner in ensuring that regulators receive the data they need while recognizing what companies are able to provide, and what resources will be needed to be able to provide data that is not currently easily reported.

Following are comments and concerns from APCIA member companies grouped by template and definition-specific concerns, logistical concerns and feedback on the ability to report square footage data.

Template and Definitions

Reporting Year – Six (likely seven) years of data will take a significant amount of time to program for and to report. For many companies, a look back period of so many years requires queries across legacy systems and may include obtaining data for since closed or merged companies. As much of the data was collected from a large number of carriers in 2024 (2018-2022), APCIA suggests collecting only 2023, 2024, and 2025 (if timing of the data call warrants). Still companies will need significant lead time for IT programming.

Maximum % RC Written – Is the definition to be read that 126 is the maximum percent that can be reported? How would a company with a GRC of 150% on some policies report that?

¹ The American Property Casualty Insurance Association (APCIA) is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions-protecting families, communities, and businesses in the U.S. and across the globe.

Count of Paid Claims for Fire and Removal and Fire caused by Lightning in Reporting Year – What are companies meant to report here? Is it referring to removal of debris, or a loss causation of fire?

Losses Paid for Fire and Removal and Fire caused by Lightning in Reporting Year – The definition reads, “Total sum of losses paid during the reporting year for fire and removal and fire caused by lightning.” Do companies report only indemnity, or are expenses included? Should subrogation be excluded?

Losses Paid for Wind and Hail in Reporting Year – Similarly, do companies report only indemnity, or are expenses included?

Count of Paid Claims for Wildfire in Reporting Year – If a company does not write a wildfire-specific policy or endorsement, would they report zero/null or would they report number of claims with a loss causation or wildfire?

Written Premium and Returned Premium for Cancelled Policies in the Reporting Year – How would a company report multiple cancellations of a policy in the same reporting year? How would a company account for a policy that was cancelled and then reinstated?

Returned Premium for Cancelled Policies in Reporting Year – Is this intended to capture the credit resulting from the cancellation or the amount refunded to the insured after cancellation? Those are often two different amounts. For instance, the policy could cancel resulting in a \$100 credit but there could be \$50 still due on the policy. A company would only refund \$50 to the insured. Also, if the policy is rewritten to a new policy number, often times an agent will ask the company to transfer any overpayment to the new number. In those cases, no refund would go out on the canceled policy. It would be preferable to report the credit resulting from the cancellation (the returned premiums booked to the general ledger) rather than the amounts sent via refund to the insured and regulators would be assured of receiving comparable data from companies.

Part IV: Mitigation Discounts for Policies in Force (PIF) – APCIA members have significant concerns with this section of the template. Many companies do not capture whether a discount is “State Required” or “Non-State Required” in their systems and given the different requirements in the various states, to pull this data would be quite complex. Also, APCIA suggests the definition be expanded to include examples of what is considered a mitigation discount.

Logistical Concerns

- **Timing:** Q1 and April are very busy times for the companies due to existing reporting requirements (i.e., financial annual statement, statistical reporting, and MCAS). In addition, there are several property and casualty annual data calls due in June. APCIA respectfully requests that this data be collected in late summer or early fall. For the initial reporting, this will also afford companies the time necessary for systems changes and other IT work to ensure accurate data is reported. APCIA members have indicated that the programming work could take up to 120 days or longer.

- **Threshold:** A firm threshold establishing what companies are required to report data is necessary. Also, APCIA suggests that it be made clear if this data call is limited to admitted carriers.
- **Notice:** The Data Call Notices should be sent to the designated market conduct contact for each entity required to report.
- **Authority:** The Data Call Notices should provide a clear statutory authority under which this data is being requested for each state.
- **Confidentiality:** APCIA requests confidentiality language be written clearly in the Data Call Notices, with verbiage detailing the level at which the data will be publicly released.
- **Exception List:** APCIA requests a detailed listing of all potential Exceptions be provided to companies to support validation of data prior to the portal upload.
- **Access to Portal:** APCIA requests that advanced access to the portal be provided to allow companies to test uploads prior to submission.
- **Post-submission Follow ups:** Ideally, the NAIC would send a single communication detailing all concerns on submitted data. After the submission for the first iteration of the data call in 2024, many companies received communications from multiple contacts requesting review and potential resubmission of data due to perceived issues identified by the NAIC.
- **Standardized Timelines:** If this data call is put on an annual schedule, APCIA suggests a revision procedure similar to that for MCAS be implemented for any future revisions to the template or definitions. This would include standardized timeline for notifications and submissions, timeline and cutoff date for the introduction and approval of changes, and communication of summary of approved changes.

Reporting Square Footage

APCIA members overwhelmingly indicated that reporting square footage would be problematic. On both vendor and agent forms, square footage is an optional field, not a required one. Also, the agent-entered vs. vendor-entered (Lexis Nexis) data might not match. APCIA believes square footage data based on zip can be obtained from alternative public sources. For example:

- [Caliper Housing Data](#)
 - Source is a company that offers housing data compiled from US Census data (American Community Survey)
- [Census Bureau Tables](#)
 - Source the United States Census Bureau
 - Contains house sizes (by room count) by state (available by other geographic measures as well including by County and Zip)
- [ACS 5YR Housing Estimate Data by Tract | HUD Open Data Site](#)
 - Source U.S. Department of Housing and Urban Development
- [U.S. Energy and Information Administration](#)
 - Includes National housing characteristics included square footage
 - Updated every ~ 5 years

- [AHS Info Graphic](#)
 - Generated using data from Zillow

As a note, the U.S. Department of Housing and Urban Development is increasing the frequency of data collection and content provided as of January 2026: [American Housing Survey to Adopt New Data Collection Model](#).

APCIA offers to continue to work cooperatively with the Task Force in developing a data call that provides useful information to regulators.

Thank you for the opportunity to provide comments. If you have any questions or would like to discuss any of our comments further, please let us know.

Respectfully Submitted,



Lisa Brown
Assistant Vice President, Market Conduct and Counsel