

September 15, 2025

Commissioner Yaworsky (FL), Chair  
NAIC Homeowners Market Data Call (C) Task Force  
c/o Aaron Brandenburg, Assistant Director, P&C Regulatory Services  
Via email [abrandenburg@naic.org](mailto:abrandenburg@naic.org)

**Re: NAMIC Comments on the Homeowners Market Data Call Revised Data Call Template and Data Call Definitions**

Dear Commissioner Yaworsky and Members of the Task Force:

On behalf of our members, the National Association of Mutual Insurance Companies (NAMIC)<sup>1</sup> would like to thank the NAIC Homeowners Market Data Call (C) Task Force for requesting and accepting comments on the revised Data Call Template and Data Call Definitions. NAMIC appreciates the Task Force's continued efforts to work with the industry to streamline the data call process and provide ample lead time for carriers to implement the changes to their systems for production.

We continue to encourage the NAIC to provide transparent and robust opportunities to work collaboratively with all stakeholders on this data call. NAMIC provides the following substantive comments and specific technical comments/edits to the revised data points and definitions. NAMIC additionally, provides procedural requests, questions, and recommendations for the call letter in order to properly request and protect data.

**HOMEOWNERS MARKET DATA CALL- DEFINITIONS/DATA ELEMENTS**

**[1] Direct Written Premium Definition**

Many of the redlines adjust the definitions from a calendar year reporting period to an in-force as of December 31<sup>st</sup> reporting. From a consistency standpoint, all topics from an in-force perspective should allow for an apples-to-apples review of the data. Direct Written Premium (DWP) by definition in the Market Conduct Annual Statement (MCAS) is the "total amount of direct written premium for all policies written during the reporting period" or the flow of new and renewed business over a period. The redlined definition for DWP while limited to in-force premiums also includes "premium added or deleted from endorsements throughout the calendar year" but would not include policies that were canceled or nonrenewed during the calendar year. In-force means the total value of active policies on a specific date, so it would be uncommon to include other elements. Later in the materials, information is requested for written premium for the

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<sup>1</sup> NAMIC membership includes more than 1,500 member companies. The association supports regional and local mutual insurance companies on main streets across America and many of the country's largest national insurers. NAMIC member companies write \$323 billion in annual premiums and our members account for 67 percent of homeowners insurance. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.



calendar year to not be included in DWP but no similar request for non-renewed premium, only a policy count.

If it is the intent to collect premiums on an in-force basis, representing the value of all active unexpired policies as of a specific date, we would recommend two options.

1. Update the title from “Direct Written Premium” to “Written Premium In-Force” and remove the requirement to include premium for endorsements and coverage added and deleted during the year. If the endorsement information is needed, collect in a separate column consistent with “Written Premium for Cancelled Policies in Reporting Year”.
2. Conversely, shift to actual DWP and collect the total amount of direct written premium for all policies written during the reporting period which would reconcile to the Annual Statement and to MCAS for the line. This change to DWP would also require “Direct” be added to the definition for “Written Premium for Cancelled Policies in Reporting Year”.

### **[2] New sentence on ACV- Clarification Requested**

The Task Force asked the following relative to ACV “If a policy dictates ACV based on the peril, please report as ACV”. NAMIC requests the task force include an example or additional clarification for this added sentence.

### **[3] Fire and Lighting Definitions- Clarification Questions**

The Fire and Lightening Definitions currently include:

- *Count of Paid Claims for Fire and Removal and Fire Caused by Lightning in Reporting Year.*
- *Losses Paid for Fire and Removal and Fire Caused by Lightning in Reporting Year.*

For the above bullet points, NAMIC has the following questions:

1. On the Count, does the removal refer to debris removal or loss causation of fire?
2. On Losses Paid, does this include expenses, or indemnity only? Do we exclude subrogation?
3. Some carriers do not record if a lightning strike caused a fire, as that level of data is not tracked in their lightning major peril or sub peril detail.
  - Some of these categorical breakdowns may result in zeros.

### **[4] Count of Paid Claims in Reporting Year**

NAMIC appreciates and recognizes the Task Force’s provided clarification relative to the “count of paid claims in reporting year.”

### **[5] Part IV: Mitigation Discounts for Policies In-Force**

NAMIC notes that the implementation of this request will require extensive coding and manual processes, and that there is high risk of misinterpretation and data quality issues. We wish to raise for the Task Force that this may be an area during implementation where additional questions may need to be asked and could result in possible delays.



## **SUBSTANTIVE COMMENTS & QUESTIONS**

### **[1] Procedure Requests**

- a. NAMIC requests a minimum of 120 days for members to implement changes to their systems and to allow follow-up questions as those updates are made.
- b. NAMIC requests a submission date no earlier than May 2026, with the intent to avoid conflicts with Annual Statement submissions and MCAS submissions.
- c. Similarly to MCAS, NAMIC suggests implementation of a charge for the Task Force to wait at least three years for any new updates to the data points and definitions after this data call takes effect.
- d. NAMIC requests a calendar year state date no earlier than 2023 as the prior submission was through 2022.

### **[2] Procedure Questions**

NAMIC requests the Task Force to provide information on the following procedural items:

- a. Does the NAIC intend to issue an annual report? If so, is it with the intent of using aggregated and anonymized data?
- b. How do the States and NAIC intend to use the data? Will there be a partnership with CIPR?
- c. Given the overlap with other data calls, will efforts be made to reduce other data calls? NAMIC is familiar with the NAIC Data Call Study Group in the (H) Committee, for example, and would encourage the Task Force to collaborate with that Group's efforts toward reducing data call redundancy.

### **[3] Call letter and state participation**

As the progression of updates are made to the template and data points, we would like to take the opportunity to discuss important elements for inclusion in the call letter. These elements should support information sharing between the Insurance Company, State, and collection by the NAIC, in compliance with state statutes. These elements include:

- a. A list of all participating states with Director/Commissioner signature(s).
- b. The Information requested in the letter is being requested pursuant to [state code citation(s)].
- c. The Department of Insurance(s) agrees that the data produced by the reporting Company in response to the [date] letter is confidential pursuant to [state code citation(s)].
- d. The Department of Insurance(s) intends to share the data produced by the reporting Company with the NAIC pursuant to [state code citation(s)].
- e. The Department of Insurance(s) and NAIC will treat the reporting Company's non-aggregated data, even if anonymized, as confidential information protected pursuant to [state] law and will not release it or provide access to the public.
- f. The Department of Insurance(s) and NAIC will not release raw granular zip code level data to the public, even if anonymized and aggregated.



### SUMMARY

NAMIC thanks the Task Force again for the opportunity to provide comments. NAMIC endeavors through these comments to highlight areas that the Task Force should provide focus. We look forward to a continued partnership throughout this process, as the Task Force arrives at solutions that protect consumers and the insurance marketplace through collection of data regulators need to accomplish this task.

Sincerely,

Erica Weyhenmeyer, CPCU, MCM, AIE  
Policy Vice President- Market Regulation & Workers' Compensation  
NAMIC