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Subject: Re: Exposure of P&C Committee's A/A Playbook Draft

Good Afternoon Anne,

On behalf of Commissioner Grant, I am submitting Maryland's comments for the the Affordability and Availability (A/A) of Homeowners Insurance Playbook:

- Given the length of this document, adding a **more detailed table of contents** (other than the brief 4 parts referenced in the Executive Summary) and an **index** at the end of the document would make this reference a lot more usable. Given the length of the document and the fact that there is no confidential information included within it, perhaps some AI solution could be used to assist in generating those two additional report elements (potentially).
- The Playbook does provide a **very balanced overview**. It is very much focused on how **regulators, legislators, private industry, consumers, and other stakeholders can work together** to address these issues. This most recent version of the draft addresses some of the concerns addressed by the APCIA in its earlier comments that the Playbook wasn't doing enough to detail the market forces that have pushed rates up.
- The discussion on pages 12 and 13, regarding building code updates, provides a very thorough explanation of how there is increased cost in the short-term, but decreased cost in the long-term.
- There is a lot of redundancy in "Part 1: Direct Consumer Impact, Macro Trends, and Factors Increasing Existing Risks." For instance, the impact of inflation is discussed in multiple sections. Trimming down the extent to which topics are revisited would help with the overall readability of the document.
- The way that sections have been grouped, by peril and by state strategies, in "Part 2: Peril-Specific State Innovation and Action", increases the usefulness of this Playbook as a tool.

- "Part 3: Emerging Protection Gaps" only has two sub-topics: Atmospheric Rivers and Flooding - California and Extreme Heat - California. It is just 7 pages long. Part 2 is 53 pages and Part 1 is 25 pages. Part 3 could likely be incorporated into Part 2.
- "Part 4: Strategies and Implementation Considerations" appears to not be fully completed yet. The final paragraph of the sub section, "Regulatory Data and Transparency Tools", indicates what the section will discuss. There should be additional details regarding the HMDC included in this section. There are only two small references to it and neither provides any significant detail about it.
- Providing a conclusion and giving additional attention to the structure and how it will be used will make the document overall much more usable. It's difficult to provide any additional details given its length and the fact that it does not appear to be at a "final draft" phase yet.
- There should be some attention given to how this document will be updated in the future. Even within a few years, I'm sure that significant changes will be needed.

Thank you for the opportunity to comment and let us know if you have any questions. Have a great day!



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