

Frequently Asked Questions

Oregon DFR 2020 Wildfire Catastrophe Claims and Fire Marshal Premium Assessment Data Call

As of 3/4/2021

General Questions

Question 1: Do we still have to submit reports for the 2020 Wildfire and Wind Data Call?

Answer 1: No, DFR rescinds the data call and replaces it with the 2020 Wildfire Catastrophe Claims and Fire Marshal Premium Assessment Data Call.

Question 2 (both answered below)

1: Please advise if this new reporting requirement will be due annually or if it will be a one-time request due March 23, 2021.

2: Is it expected that the PART 2 portion will remain static for the future? Or is it expected to change in the future?

Answer 2: At this time, it is not intended to be an ongoing data call. However, if Oregon's Insurance Commissioner determines additional reporting is required, information will be communicated as promptly as possible. For this reason, it is difficult to determine whether any future inquiries would remain static or change.

Question 3: Part 2 has a due date of 3/17/2021, but your data call instructions state 3/23/2021 for both parts. Which is correct?

Answer 3: 3/23/2021 is the correct due date. A revised template has been provided and is also available on the NAIC's website at https://content.naic.org/industry_state_disaster_reporting_data_calls.htm.

Question 4: How can I make sure I have the most current Frequently Asked Questions?

Answer 4: A notice will be sent to all contacts identified for each group or company including the most current FAQs. The most current FAQs will be available on the NAIC's website at https://content.naic.org/industry_state_disaster_reporting_data_calls.htm.

Group & Company Questions

Question 5: If reporting as a group, should we submit separate templates for each group?

Answer 5: No, one template should be submitted for each part of the data call that includes combined information for all companies within the group that are required to report.

Question 6: Not all companies within our group are listed in Appendix A, do we need to include those not listed.

Answer 6: No, the companies listed are the companies required to report. This list of companies is based on companies that reported business applicable to one or both parts of this data call on their 2019 annual statement. If there is a company in your group that you believe has business to report you may notify us and include them in a group response.

Question 7: There is a company listed for our group, but that company was sold prior to this data call being issued. How should we handle this?

Answer 7: Please notify DFR of this change, please include the companies name and NAIC code along with the new group the company is part of. DFR will work with the new group to make sure reporting is completed.

File Submission Requirements

Question 8: With a file name limit of 12 characters, is there a suggested naming convention for a company or group submission?

Answer 8: No suggested naming convention. The file names are not reviewed or seen by DFR. The 12-character limit is required for the NAIC's reporting portal. Use what works best for your company or group.

Question 9: Please advise how companies can indicate that they have NO data to report in relation to the Oregon Wildfire Claims.

Answer 9: The call letter includes directions regarding the submission of the "Attestation of No Information to Report" form. Please follow these steps to indicate if your company has no data to report. Please keep in mind, a company should only submit an attestation form if they are not reporting as part of a group. If an entire group has no data then the attestation should be submitted for the entire group.

Question 10: If filing as a group and certain companies in our group have zero data to report, do we have to submit an Attestation of No Information to Report for each company?

Answer 10: No, if submitting at the group level you do not need to submit Attestation's of No Information to Report for individual companies within your group.

Question 11 (both answered below):

1: We are having difficulty submitting a file through the NAIC's reporting portal. What should we do?

2: The NAIC file Regulatory Data Collection Guide indicates a filing can be rejected for incorrect formatting. Besides only a 12-byte name, where can I locate the details regarding the formatting requirements for the data to be reported?

Answer 11: Please refer to the NAIC's Regulatory Data Collection File Submission Guide for questions regarding the submission of the templates. (https://content.naic.org/sites/default/files/inline-files/Regulatory%20Data%20Collection%20Guide_0.pdf).

If you are still having difficulties after reviewing the file you can also contact the NAIC at help@naic.org.

Part 1 Template and Data Reporting

Question 12: Could you please confirm if Zip Codes: 00069, 00070 and 00077 are correct, or if different zip codes should be used?

Answer 12: These zip codes cover national forest areas in the Oregon.
00069 & 00077 – Willamette National Forest. 00070 – Mt Hood National Forest.

Question 13: The prior template had different tabs for reporting based on product and line; this one does not. Do you want all lines reported on the same template? All Fire lines? All Auto lines? Should we use separate templates?

Answer 13: For this data call claims will not be split out by product and line. The call letter provides directions regarding what claims to include.

Question 14: The data call requests the "Number of Total Loss Claims". Does that request pertain to Property / Structures or Auto or both?

Answer 14: Both should be included.

Part 2 Template and Data Reporting

Question 15: The current OR Fire Marshal Assessment template does not have a tab for Inland Marine data. Is Inland Marine data required for this filing?

Answer 15: Inland Marine is required. A revised template has been provided and is also available on the NAIC's website at https://content.naic.org/industry_state_disaster_reporting_data_calls.htm.

Question 16: For the Part 2 template, are there specific fields in the reporting templates that should be filled out?

Answer: 16 Each line of business must only have one record of data submitted and it should be reported in the blue highlighted boxes. If you have no data to report for a line of business or specific range, leave the fields blank.

Question 17: Do you want all business reported on the same template when reporting as a group?

Answer 17: Yes, if you are reporting as a group, all information should be reported on a single template.

Question 18: Please advise if travel insurance and cyber insurance should be reported for Part 2 of this data call.

Answer 18: If the company reports travel and cyber insurance under inland, then the premium and policy count should be included.

Question 19: Much of all our inland marine premium is pet insurance. Including personal property endorsements makes sense, but animal health insurance does not fit the intent of this call which is for understanding property risk.

Answer 19: The primary purpose of this data call is to evaluate options for the current assessment structure, not to estimate the value at risk for fire coverage or specific wild fire events.

Question 20: Does the definition of Homeowners include Condominium products?

Answer 20: Yes, condominium products are considered homeowners products for this data call.

Question 21: Our company writes a Landlord Protection Policy (LPP)/Continuous Dwelling Fire (CDF) policy with both Fire (010) and Allied Lines (021) coverages. Should we only capture the Fire (010) Premiums and Insured Values and ignore the Allied Lines (021) premiums and insured values?

Answer 21: The allied lines premium and insured value should be excluded if these amounts are reported under allied lines in the annual statement.

Question 22: We have situations where IM coverage is included on a Homeowners/Tenant product. Do you want the associated premium and insured value included with the policy (Homeowners/Tenant) where the coverage is written? Or do you want the premiums and insured value for these Inland Marine coverages reported under Inland Marine?

Answer 22: Reporting should be consistent with the how the policy is reported in your annual statement. All business reported under the lines of business included on the data call letter should be included in your report. The intent of Part 2 is not to understand property risk, but to better understand the Fire Marshal Premium Assessment.

Example 1: Policies with inland marine endorsements should be reported under inland if the insurers reports these policies under inland marine in their Annual Statement.

Example 2: If the policy is reported under a different annual statement line (like homeowners), then the policy, including the endorsement premium, should be reported as requested for the annual statement line under which it is reported (homeowners in this case).

Example 3: If the endorsement is reported separately from the base policy, then policy count and endorsement premium should be reported.

Question 23: We have a vendor product which the financials are reported on our Inland Marine (090) line of business. Since the product is vendor produced, we may have an issue with capturing the Aggregated Total Insured Value. How would you like this handled, if we cannot obtain the required information by the desired date?

Answer 23: Please reach out to us immediately to discuss any disruptions to reporting by the required due date. Please provide details on the availability of the data and when you would anticipate being able to report. We will work with companies on an individual basis to determine the appropriate solution.

Question 24: Please confirm that personal and commercial Inland Marine should be combined on the appropriate tab in the Part 2 template. Please clarify the scope of inland marine, are we to submit inland marine data for personal lines, commercial lines, or both?

Answer 24: Reporting for Inland Marine should include both personal and commercial lines, they will be combined and reported under the Inland Marine tab.

Question 25 (both answered below):

1: Based on the instructions (“Number of Policies – Total count of all policies for which coverage was in effect as of Dec. 31, 2019, for the specific premium range being reported”), is the department intending to receive

policies that were in effect as of 12/31/19, or is the intent to get policies that had effective dates as of 12/31/19 or later?

2: Please verify that companies should report in-force Policy information as of 12/31/19 on Part 2 - Fire Marshal Premium Assessment Reporting Form and not Calendar Year 2019 data.

Answer 25: All policies that were in effect as of 12/31/19 should be reported. The yearly premium charged that is reported should also align with those same policies.

Question 26: Regarding template 2, the data points are applicable to only policies in effect as of 12/31/2019. Should the premiums be reported as of the same date (12/31/2019)?

Answer 26: Yearly Premium should be reflective of the policies in-force as of 12/31/2019. Example: if a company identifies 10 policies in effect as of 12/31/2019 the premium reported would be the total yearly premium charged for those 10 policies for the effective period including the date of 12/31/2019, report. Example: Policy is effective 7/1/2019 – 6/30/2020, the total premium charged for the policy for the full year would be reported **whether it was fully collected or not.**

Question 27: We have some policies that are based on a 6-month term. How should we report total yearly premium charged?

Answer 27: Any policy that has a term less than a full year should be annualized so the premium reported reflects what would be charged if the term was a full year. Example: Policy term is 6 months, from 8/1/2019 – 2/1/2020 with \$500 premium charged. This policy would be reported as \$1,000 premium charged.

Question 28: If we pull our data for policies in effect as of 12/31/2019, the total premium reported will not match to our financials, as we are not considering the endorsements, cancellations, etc....but only the policies in effect as of 12/31/2019. Is this your intention? Or to match the financials?

Answer 28: We recognize the premium reported will likely not reconcile to the amounts reported on the annual statement due to various circumstances. If we see a significant difference between the written premium reported on annual statement and total yearly premium reported, we may ask for clarification.

Question 29: From a Commercial perspective, we may have audits at any time in 2020, which would affect the yearly premium of those policies in effect as of 12/31/2020. Should we include any audit changes in the reporting year of 2020?

Answer 29: Yes, audits changes should be reflected in the information reported.

Question 30: On the homeowner's portion are you looking for coverage A, B, and C?

Answer 30: Refer to the definition of insured value in the data call.

Question 31: On the auto physical damage file, if a policy has 2 vehicles, both with physical damage coverage are you counting that as 1 policy or 2, as there are 2 vehicles?

Answer 31: The policy counts should be reported rather than the number of vehicles insured.

Question 32: Suppose a CMP policy, subtype Inland Marine, has part of the premium booked in ASL 5.1 and part in ASL 9.0. Should this be treated as:

- a. All premium and limits reported as CMP, or
- b. All premium and limits reported as IM, or
- c. Premium and limits separated by ASL (even though ASL is not reportable), with in-force counts duplicated, or
- d. Something else?

Answer 32: Option c is what's requested for this data call. DFR would appreciate it if you provided an explanation or clarification if you believe this has a material effect of the amounts reported. Any explanations should be sent to <ins.mrktSurv@oregon.gov>.

Question 33: How should an in-force policy be reported when there is no written premium within the reportable experience year?

Answer 33: If the policy is in-force as of 12/31/2019, then the policy count and premium information should be included in this data call.

Question 34: We issue one policy only to COMPANY, in the state of Michigan, for coverage on its auto physical damage exposure as a lienholder. No policies are written by COMPANY in the state of Oregon, however, an amount of premium is collected from the Michigan insured relative to an amount of Oregon exposure.

Please advise what further information I may provide, or whether you are able to assist us in determining our reporting requirements.

Answer 34: It appears this policy is not issued in Oregon and is not subject to the Fire Marshall assessment. Information about this policy should not be reported in this data call.

Question 35: Our company writes Inland Marine business in Oregon, but it is for travel, event ticket, and tuition insurance. We do not cover real property and we do not insure against the peril of fire. How should we handle the reporting for this data call?

Answer 35: The policy and premium information reported in the inland marine annual statement line should be reported in this data call.

Question 36: For CL/PL Auto Physical Damage, if POLICY A is in effect as of 12/31/2019, but did not have comp/coll on any vehicle, should the policy not be reported?

Answer 36: Information for this policy should not be reported in this data call.

Question 37: For CL/PL Auto Physical Damage, If POLICY A is in effect as of 12/31/2019, with no physical damage on any vehicle, but had physical Damage coverage at some time during the 2019 calendar year, are you expecting the dollars associated with that coverage to be reported, even though the coverage was not in place as of 12/31/2019?

Answer 37: Premium for policies that were collected for coverage that is not in effect as of 12/31/2019 should not be reported in this data call.

Question 38: For CL/PL Auto Physical Damage reporting, are you expecting the total policy premium, for the year, to be reported? Or should we be only reporting the Physical Damage premium?

Answer 38: Only the auto physical damage premium should be reported.

Question 39: For some policies, such as a Farmowners policy, along with Farm vehicles, structures, livestock, etc... we could be insuring an owner-occupied home and personally owned/operated PPA. Are we to report the premiums and appropriate values under the Farmowners Policy? Separate them into three with a policy count tripled (Farm, Home, PPA Phys Dam)?

Answer 39: The premium and policy counts for these products should be reported as on the annual statement. DFR would appreciate it if you provided an explanation or clarification if you believe this has a material effect of the amounts reported. Any explanations or clarifications should be sent to [<ins.mrktsurv@oregon.gov>](mailto:ins.mrktsurv@oregon.gov).

Question 40: What vehicle types qualify to be reported? Private Passenger Vehicle, MotorHome, Motorcycle, Classic, Collector, Off Road Vehicles, Antique?

Answer 40: Premium and policy count for any vehicles that are reported under auto physical damage line in the annual statement should be reported in this data call.