November 6, 2026

Ms. Nancy Beydler
National Association of Insurance Commissioners
1100 Walnut St.
Suite 1000
Kansas City, MO
64106-2197

IBHS Comments

Re: Public Comment on the Second Exposure Draft Residential Mitigation Grant Program Model Act (October 21, 2026)

Dear Ms. Beydler and Members of the Working Group:

The Insurance Institute for Business & Home Safety (IBHS) appreciates the opportunity to comment on the second exposure draft of the Residential Mitigation Grant Program Model Act. IBHS is an independent nonprofit scientific research and communications organization supported by the property insurance industry. Our work examines how homes and businesses are damaged by severe weather and wildfire and translates that research into practical actions that can reduce damage and disruption.

IBHS supports the Working Group's effort to provide states with an enabling framework for residential mitigation grant programs administered through state departments of insurance. We appreciate the Working Group's continued consideration of stakeholder feedback, including the recommendations IBHS submitted on September 8, 2026.

We understand the model is intended to provide a common architecture for voluntary programs while remaining peril-agnostic and standard-agnostic. Within that framework, flexibility should be paired with clear, science-based criteria that help states direct mitigation investments toward credible risk reduction. Our accompanying markup focuses on two related priorities: establishing appropriate criteria regarding the adoption of Qualified Mitigation Measures and consistently addressing both Qualified Mitigation Measures and Recognized Mitigation Standards throughout the Act.

Preserve the strengthened criteria for Recognized Mitigation Standards

IBHS welcomes the stronger definition of "Recognized Mitigation Standard" and the corresponding approval criteria in Section 5A. These provisions establish important safeguards: a verifiable, science-based standard; development and maintenance by a nationally or regionally recognized standard-setting organization; independent verification of compliance; and documented, peril-specific loss-reduction evidence.

These criteria help give states, insurers, homeowners, and contractors a clearer basis for understanding and trusting the mitigation work supported by the grant program. We encourage the Working Group to retain them. Our markup also clarifies the Section 3 drafting note's reference to the IBHS Wildfire Prepared standard alongside FORTIFIED.

Limit Qualified Mitigation Measures to perils without a Recognized Mitigation Standard and Tie Adoption to Loss Reduction Evidence

Our principal concern remains that the term "Qualified Mitigation Measures" is used throughout the model without the same safeguards that apply to Recognized Mitigation Standards. Without clear adoption criteria, the term "Qualified Mitigation Measures" could permit isolated measures to substitute for an available systems-based standard, potentially bypassing the requirements stipulated in Section 5 that ensure meaningful risk-reduction is achieved.

In our first comment letter, IBHS recommended removing Qualified Mitigation Measures in favor of consistently using Recognized Mitigation Standards. If the Working Group retains use of both terms, we recommend limiting the adoption of Qualified Mitigation Measures to circumstances in which a Recognized Mitigation Standard is not available for the Designated Peril and where documented, peril-specific loss-reduction evidence exists.

Specifically, our proposed replacement for Section 5C reads:

> *"In the absence of a Recognized Mitigation Standard for a designated peril, the Commissioner may apply a Qualified Mitigation Measure based on the same evidentiary showing required under Section 5A(4)."*

Section 5A(4) requires documented, peril-specific loss-reduction evidence, which may include credible data, engineering analysis, peer-reviewed research, catastrophe modeling, or actuarial studies. This

approach preserves a pathway for addressing hazards without an available Recognized Mitigation Standard while requiring an evidence-based justification for the measure selected.

Our markup also expressly connects the definition of "Qualified Mitigation Measures" to approval under Section 5 and revises Section 5's heading to refer to both Qualified Mitigation Measures and Recognized Mitigation Standards.

Use both defined terms – Qualified Mitigation Measure and Recognized Mitigation Standard – consistently throughout the Act

If both terms remain, the model should clearly address Qualified Mitigation Measures and Recognized Mitigation Standards wherever the relevant program requirements or insurance provisions apply. References to Qualified Mitigation Measures alone should not inadvertently omit work that meets a Recognized Mitigation Standard.

Our proposed conforming edits address:

- **Definitions in Section 3:** Clarify that Enrolled Contractors may implement Recognized Mitigation Standards and that Independent Third-Party Verifiers may document adherence to those standards.
- **Program establishment in Section 4:** Expressly include implementation of Recognized Mitigation Standards among the purposes for which financial assistance is available.
- **Grant uses and disbursement in Section 6:** Include Recognized Mitigation Standards in provisions governing eligible work, related costs, and documentation supporting disbursement.
- **Contractor requirements in Section 7:** Clarify that the requirements apply to work related to both Qualified Mitigation Measures and Recognized Mitigation Standards.
- **Insurance provisions in Section 9:** Consistently address both Qualified Mitigation Measures and Recognized Mitigation Standards in provisions governing discounts or rate reductions, documentation, maintenance, continuation upon property transfer, benchmark-table references, and optional endorsement eligibility.

These edits do not make Qualified Mitigation Measures and Recognized Mitigation Standards interchangeable. Rather, they ensure that the Act operates consistently once the appropriate Qualified Mitigation Measures or Recognized Mitigation Standards have been established under Section 5.

IBHS commends the Working Group's continued work to help states advance practical, science-informed residential mitigation. Retaining the strengthened standards criteria, narrowing the circumstances in which Qualified Mitigation Measures may be used, and applying both terms consistently will improve the model's clarity while preserving its flexibility.

Thank you for considering these comments and the accompanying proposed edits. IBHS would be pleased to provide additional technical input or discuss these recommendations with the Working Group.

Sincerely,



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