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CHIEF EXECUTIVE OFFICER: Will Melofchik

September 8, 2026

The Honorable Timothy J. Temple
Commissioner, Louisiana Department of Insurance
Chair, Pre-Disaster Mitigation and Risk Modeling (EX) Working Group
National Association of Insurance Commissioners

The Honorable Glen Mulready
Commissioner, Oklahoma Insurance Department
Vice Chair, Pre-Disaster Mitigation and Risk Modeling (EX) Working Group
National Association of Insurance Commissioners

Attn: Nancy Beydler, Senior Administrative Assistant
Sent via email to Nancy Beydler (**nbeydler@naic.org**)

RE: NCOIL Comments on NAIC's Draft Residential Mitigation Grant Program Model Act

Dear Commissioner Temple and Commissioner Mulready:

On behalf of the National Council of Insurance Legislators (NCOIL), we are responding to the request for comments on the recently distributed draft NAIC Residential Mitigation Grant Program Model Act of August 6, 2026.

We applaud the NAIC for devoting significant resources and time to the topic of mitigation. Each of us has experienced severe weather-related events in our respective states and have seen first-hand the terrible impact that they can have on communities that are not properly prepared.

We agree with the draft Model's Legislative Findings stating that "[p]erils resulting from natural hazards and weather events….pose a recurring threat to residential structures, public safety, housing affordability, and the stability of property insurance markets" and "[r]educing the frequency and severity of losses from natural hazards and weather events through mitigation efforts supports the availability and affordability of property insurance, promotes stable underwriting conditions, and reduces the risk of market disruption following catastrophic events."

The acknowledgment of how serious these issues are for consumers, legislators, regulators, and the property insurance market alike is what led NCOIL to develop and adopt our Strengthen Homes Program Model Act in 2024. In fact, NCOIL used the mitigation grant program laws already enacted in your States and worked with your staff to develop NCOIL's Model which has since been very successful and used by other States as the basis for their respective mitigation grant program laws.

Accordingly, we maintain that the development of a separate model law by the NAIC on mitigation grant programs is unnecessary and largely duplicative of NCOIL's Model. We appreciate the important and collaborative relationship that our organizations have developed throughout the past several years. We want that relationship to continue as we work towards our shared goals of protecting consumers and the state-based system of insurance.

To that end, we recommend that the NAIC either suggest amendments to the NCOIL Model, or develop a Model Regulation that serves to implement the NCOIL Model. Utilizing this approach would avoid having NCOIL and NAIC develop conflicting Models, something that both organizations have worked hard to see happen throughout the past several years.

NCOIL appreciates the opportunity to provide these comments, and we look forward to continue working with you on this important issue.

With appreciation for your consideration and best regards, we are,

Very truly yours,

Senator Paul Utke (MN)
NCOIL President

Representative Edmond Jordan (LA)
NCOIL Vice President

Representative Jim Dunnigan (UT)
NCOIL Treasurer

Representative Brenda Carter (MI)
NCOIL Secretary

Assemblywoman Pamela J. Hunter (NY)
NCOIL Immediate Past President