

CLIMATE AND RESILIENCY (EX) TASK FORCE

Climate and Resiliency (EX) Task Force Dec. 9, 2025, Minutes

Draft Pending Adoption

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Climate and Resiliency (EX) Task Force
Hollywood, Florida
December 9, 2025

The Climate and Resiliency (EX) Task Force met in Hollywood, FL, Dec. 9, 2025. The following Task Force members participated: Ricardo Lara, Co-Chair, and Mike Peterson (CA); Timothy J. Temple, Co-Chair (LA); TK Keen, Co-Vice Chair (OR); Heather Carpenter (AK); Mark Fowler and Travis Taylor (AL); Jimmy Harris (AR); Michael Conway represented by Jason Lapham (CO); Jared Kosky represented by Kristin Fabian (CT); Karima M. Woods represented by Tina Ching (DC); Trinidad Navarro represented by Christina Miller (DE); Michael Yaworsky represented by Jane Nelson (FL); Scott Saiki (HI); Doug Ommen (IA); Ann Gillespie (IL); Holly W. Lambert represented by Alex Peck (IN); Vicki Schmidt represented by Josh Carlson (KS); Sharon P. Clark represented by Shawn Boggs (KY); Michael T. Caljouw represented by Jackie Horigan (MA); Marie Grant (MD); Robert L. Carey and Sandra Darby (ME); Grace Arnold represented by Phil Vigliaturo and Julie Dreier (MN); Angela L. Nelson represented by Julie Lederer (MO); Mike Chaney represented by Aaron Cooper (MS); Mike Causey represented by Angela Hatchell (NC); Jon Godfread represented by Matt Fischer (ND); Justin Zimmerman represented by William Rader (NJ); Ned Gaines (NV); Kaitlin Asrow represented by Alaba Aladeniyi (NY); Judith L. French represented by Matt Walsh (OH); Glen Mulready represented by Donna Dorr (OK); Michael Humphreys represented by Richard Hendrickson and Michael McKenney (PA); Suzette M. Del Valle (PR); Elizabeth Kelleher Dwyer represented by Beth Vollucci (RI); Michael Wise represented by Diane Cooper (SC); Kaj Samsom represented by Rosemary Raszka (VT); Patty Kuderer represented by Jay Bruns (WA); Nathan Houdek represented by Sarah Smith (WI); and Jeff Rude (WY).

1. Adopted its Summer National Meeting Minutes

Commissioner Gaines made a motion, seconded by Commissioner Keen, to adopt the Task Force's Aug. 11 minutes (see *NAIC Proceedings – Summer 2025, Climate and Resiliency (EX) Task Force*). The motion passed unanimously.

2. Discussed its Proposed Charges and Updates

Commissioner Lara said the NAIC is proposing to restructure and consolidate the existing Climate and Resiliency (EX) Task Force, Catastrophe Insurance (C) Working Group, and NAIC/Federal Emergency Management Agency (FEMA) (C) Working Group into the new Natural Catastrophe Risk and Resilience (EX) Task Force. He said the streamlined structure will enhance coordination among regulators and stakeholders, strengthen natural catastrophe risk management, improve communication and mitigation strategies, and align more closely with the Center for Insurance Policy and Research (CIPR) Catastrophe Risk Management Center of Excellence (COE), including helping those states with risk mitigation grant programs to maximize risk reduction and improve insurability. He said the Task Force has taken note of a suggestion to include extreme cold winter storms into its priorities of severe perils. Commissioner Temple agreed that the Task Force will be inclusive of severe perils that state insurance regulators view as a priority to address.

Horigan asked for clarification on the incorporation of the Catastrophe Insurance (C) Working Group, NAIC/FEMA (C) Working Group, and the previous Task Force workstreams into the new charges. Commissioner Lara clarified that the work and charges from those Working Groups would be rolled into the charges of the two new Working Groups to be established under this Task Force, which would be working groups on Pre-Disaster Mitigation and Risk Modeling, and Severe Perils.

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3. Discussed the *Natural Catastrophe Risk Dashboard* Report

Commissioner Temple said a drafting group of the Task Force developed the Natural Catastrophe Risk Dashboard to give regulators data on national metrics aimed at understanding issues of catastrophe impacts on the insurance market and how these impacts can lead to protection gaps. He said the Task Force met Nov. 19 in regulator-to-regulator session to adopt the dashboard for regulator use. He said the drafting group produced a public report that summarized the trends captured in the dashboard and gave insight into how regulators would use the tool.

Dave Snyder (American Property and Casualty Insurance Association—ACPIA) asked if the original public comment period ending Jan. 2, 2026, could be extended. He asked what kind of feedback would be most useful from the industry and said transition planning and investments could be a controversial topic. He said he appreciates the consideration of mitigation, and he noted that the excess and surplus lines data are lumped in with residual markets.

Commissioner Temple said the deadline could be extended to Jan. 12, 2026. He said the Task Force wants to be collaborative so the report can be useful to regulators and the industry. Commissioner Lara said it would be helpful for industry to comment on metrics that may not be included in the dashboard, which would be a useful addition. Commissioner Lara said the Task Force would consider how to bifurcate the excess and surplus lines and residual market information.

4. Discussed the *NAIC Disaster Preparedness Guide* Summary

Commissioner Lara said the Task Force created a regulator drafting group in spring 2025 to develop a disaster preparedness guide to provide an overview of disaster preparedness, information on pre-disaster education, information on state insurance regulatory response, post-disaster after-action reports for future preparedness, common questions from the public and local officials, and state-specific case studies to help regulators. He said the Task Force received feedback on a draft outline at the Summer National Meeting, and the drafting group incorporated those comments into the development of a full document. He said the full document is still under development, and the drafting group has pivoted to an executive summary document that commissioners could use as a high-level overview of the most important pieces of disaster preparedness and response. The document includes examples from state insurance departments on consumer education materials, links to various NAIC resources, and timelines and post-disaster steps from the Lahaina, HI, fire and the North Carolina Department of Insurance's (DOI's) response following Hurricane Helene.

Amy Bach (United Policyholders—UP) thanked the Task Force for creating the document and incorporating UP's input. Commissioner Lara said that an important piece of the feedback UP provided was for state insurance regulators to serve as first responders in combating misinformation during a disaster.

Commissioner Lara said the Task Force will direct the drafting group to continue its work on the summary and full *NAIC Disaster Preparedness Guide*.

5. Heard a Presentation on Private Flood Insurance and Discussed the Flood Insurance Blueprint

Commissioner Temple said flood risk and the growing private flood insurance market are a priority for every state. He said understanding this peril is important for how states look at modeling, reinsurance, and market trends, both for residential and commercial properties. Flood insurance is also an area where there may be increasing innovation, both in how to mitigate the risk and in the policies offered by insurance companies.

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Aaron Brandenburg (NAIC) said the NAIC has collected private flood insurance data on an NAIC Financial Annual Statement supplement since 2021 for 2020 data. He said data for 2018 and 2019 were collected via a special data call. He said the number of private flood insurance policies has risen every year since 2018. He stated that the overall premium has risen, with the exception being a decrease from 2023 to 2024. He said the 2024 data shows \$1.2 billion in written premium, with nearly 800,000 policies. He said residential flood insurance has grown every year since 2020 in both premiums and policies.

Brandenburg said the highest loss ratios of residential flood were in states experiencing major flooding events in 2024. He said 21 groups wrote at least \$1,000,000 in residential flood insurance premium in 2024. He said the top 15 insurers account for approximately 81% of the overall market. He said surplus lines data shows \$2.7 billion in flood insurance premiums in 2024.

Brandenburg said policies in the National Flood Insurance Program (NFIP) peaked around 2009 at about 5.7 million policies and have steadily declined to a little over 4.6 million. He said data from October 2024 to October 2025 shows a decline in policies in all markets except North Carolina and Florida, which is likely the result of group flood policies provided by FEMA after major flooding events.

Brandenburg said the NAIC provides a Tableau tool for private flood insurance data on its website. Horigan asked if the Tableau tool could be updated to include average premium data, and Brandenburg agreed that it could.

Peterson stated that the Task Force will look to develop a flood insurance blueprint in 2026 to align with the deliverables in the NAIC National Climate Resilience Strategy for Insurance. He said the five major actions for flood insurance in the strategy are to: 1) launch a national initiative to increase awareness of flood risk and risk mitigation recommendations; 2) close protection gaps by growing private flood insurance options; 3) create new partnerships with universities and state jurisdictions to conduct local risk assessment and develop a more robust toolbox of risk mitigation strategies; 4) build stronger communication within state and local governments to support more effective risk awareness; and 5) expand advocacy for state and federal funding to reduce flood risks.

Peterson said one part of the blueprint strategy is to focus on the diversity of storm events that result in flooding, including rising rivers, coastal storm surges, snow melt, atmospheric rivers, and high rainfall events. He stated that this year in Alaska, flooding resulted from a dam breaking in a glacier lake. In California, atmospheric rivers can bring five to 10 inches of rain in one event. He said atmospheric rivers have resulted in 75% of the flood losses since 1978 in the western part of the U.S.

Peterson said past Task Force discussions have raised issues about flooding that will be used as an outline to begin the flood insurance blueprint. He said these items include risk awareness initiatives, risk mitigation planning and funding, flood insurance market data, catastrophe risk modeling research, interagency workstreams, university partnerships, and innovative products.

Peterson said it is important for this blueprint to consider the knowledge and expertise that all member states have, as well as the types of flood risks faced in each jurisdiction. He said this blueprint will consolidate the lessons learned in one document.

Bruns gave an example of a current flooding event in Washington, driven by atmospheric rivers. Director Carpenter said she would like to be able to pull in her local university to do on-the-ground research, especially because Alaska faces many types of flood risk. She said many consumers do not understand they are at risk of flood, so there needs to be a discussion on awareness and making flood insurance affordable.

McKenney said the term “flood zone” should stop being used synonymously with a special flood hazard area. He said everyone lives in a flood zone because there is a chance of flooding everywhere. He said it is important to

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encourage people outside of the special flood hazard areas to purchase flood insurance even if it is not for the full value of their home. He said \$20,000 or \$30,000 would go a long way after a flooding event and would make the premium amount affordable for many people. He said he thinks the NAIC Financial Annual Statement flood insurance supplement needs to be updated so companies report correctly and regulators can understand the insurance trends in their markets.

6. Heard an Update on Federal Matters

Alexander Swindle (NAIC) said extreme weather losses, instability in federal mitigation programs, and active congressional focus on housing and flood policy continue to shape the resilience environment. Throughout the fall, NAIC staff have engaged Congress, FEMA, the U.S. Department of Housing and Urban Development (HUD), the National Oceanic and Atmospheric Administration (NOAA), and committee support to elevate state regulator priorities around mitigation, mapping, consumer protection, and the need for stable federal tools. He said the Senate-passed FY 2026 National Defense Authorization Act includes the bipartisan ROAD to Housing Act (S. 2651), led by Sens. Tim Scott (R-SC) and Elizabeth Warren (D-MA). He said one concern is the quality of housing provided and what long-term insurability will look like. He said action on the ROAD to Housing Act stalled in the House of Representatives, and Reps. Mike Flood (R-NE) and Emanuel Cleaver (D-MO) introduced the HOME Reform Act of 2025 (H.R. 5878), which modernizes HUD's HOME Investment Partnerships Program by simplifying environmental review, broadening eligibility to workforce-income families, and increasing flexibility for resilience-oriented infrastructure and mixed-use development. These provisions can strengthen community resilience and indirectly improve conditions for property insurance availability. Swindle said the NAIC continues to support a variety of mitigation bills, including the Disaster Mitigation and Tax Parity Act, the Disaster Resiliency and Coverage Act, and the recently advanced Fix Our Forests Act, which modernizes forest management, streamlines reviews, and strengthens risk management.

Swindle said access to weather data and accurate mapping remain priorities for Congress. He stated that during the October government shutdown, NOAA retained nearly half its workforce to maintain core forecasting and storm-tracking operations. With funding restored through Jan. 30, 2026, NOAA operations have returned to normal. He said Congress introduced the bipartisan NOAA Data Preservation Act (H.R. 6184), which requires the U.S. Department of Commerce (DOC) to ensure uninterrupted public access to NOAA weather, ocean, and fishery data stored on commercial cloud systems.

Swindle said Reps. Troy Downing (R-MT) and Vicente Gonzalez Jr. (D-TX) reintroduced the bipartisan IMAGES Act, which requires FEMA to use the USGS 3D Elevation Program, incorporate planimetric features, update maps every five years, and make flood data publicly accessible. The NAIC emphasized mapping transparency and rate-setting clarity in its Sept. 15 letter to Sens. Bill Cassidy (R-LA) and Cory Booker (D-NJ), responding to their NFIP reform request for information.

Swindle said the NFIP lapsed on Oct. 1, 2025, due to the expiration of statutory authority during the government shutdown, halting new and renewal policies. With the enactment of the Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026 (H.R. 5731), the program is now reauthorized through Jan. 30, 2026. He said a coalition of 14 insurance, lending, real estate, and floodplain groups sent a joint letter urging congressional leaders to pursue a long-term NFIP reauthorization ahead of the Jan. 30, 2026, deadline. The letter highlighted risks to property transactions, renewals, and mitigation planning caused by repeated short-term extensions and the recent shutdown lapse. He said the NAIC continues to advance long-standing NFIP priorities through congressional letters, commissioner engagement, and technical consultations. The consistent requests include multi-year program stability, clear and affordable mitigation incentives for households, transparent and accurate federal flood mapping, strong federal-state coordination during disasters, and responsible growth of the private flood market.

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Swindle said FEMA reforms remain active, with recent reporting stating that the Trump administration has been weighing a proposal to relocate FEMA to Texas. He said the FEMA Review Council finalized its draft reform package, which is expected to be released this month. He said part of the FEMA Review Council process included meeting with several NAIC commissioners in September, led by Godfread. The discussion focused on long-term NFIP priorities of stability, federal-state coordination, accurate mapping, and the need for consistent consumer messaging.

7. Heard an Update from the CIPR Catastrophe Risk Management COE

Jeff Czajkowski (NAIC) said the COE-developed CAT 101 and CAT 201 courses are fully online and available through NAIC Compass. He said those courses are available for free to regulators and for a small fee to interested parties. He said the COE is developing courses on climate risk disclosures, the use of catastrophe models in property/casualty (P/C) rate filings, and reinsurance and alternative risk transfer. Czajkowski said the CIPR, in conjunction with the Society of Actuaries (SOA) Research Institute, has built a tool to analyze the NAIC climate risk disclosures. He said the tool was previewed to regulators in June 2025, and the tool has now incorporated climate risk disclosure filings from 2012 through 2024. He said the tool allows analysis of the disclosures in an efficient way, with both a visual basic tool that uses keyword search and a large language model that allows the user to ask questions about the disclosure. Czajkowski said the catastrophe models in the P/C rate filings course was launched in November with a pilot training, and it will be available online in 2026. He said the CIPR is partnering with the Reinsurance Association of America (RAA) to conduct an in-person reinsurance training in Kansas City, MO, Jan. 27–28, 2026.

Brian Powell (NAIC) said the Resilience Hub, located within the COE, engages with insurance commissioners and works with them on their risk transfer needs, including developing mitigation grant programs. He said the COE has helped a number of states set up these programs, and the rate at which states are looking to develop, design, and implement these programs has increased. Powell said the COE is looking to add two new roles to the Resilience Hub, one to help develop policy, conduct feasibility studies, and design business models to fit the nuances of certain states, and another role to be responsible for workforce training and assist commissioners and employees with the tools needed to manage the programs. Powell said one goal for the coming year is to look at developing relationships with larger national partners that have a broader reach than the current partnerships. He said the mitigation programs are currently limited by funding, and the COE would like to scale the growth of the programs and their impact on the insurance market.

Powell said the Strengthen Oklahoma Homes project came online last year, and a number of states have received authority to establish their own mitigation programs. He said Washington and New Mexico are leading the resilience effort against wildfire with the Resilience Hub. He said states like Connecticut and Maine are branching out beyond single-peril mitigation efforts. For example, Connecticut is working to develop a flood education component that goes with its mitigation grant program for wind, and Maine is looking at tree mitigation.

Czajkowski said the COE wants to provide education and training and wants regulators to have the ability to use catastrophe models as a risk mitigation tool in overseeing their markets. He said the COE has licensed a catastrophe model with Moody's Ratings (Moody's). He said there has been a significant demand for the COE's assistance with catastrophe risk assessment, and that work will continue in 2026.

Having no further business, the Climate and Resiliency (EX) Task Force adjourned.

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