Draft date: 12/1/25

2025 Fall National Meeting
Hollywood, Florida

CLIMATE AND RESILIENCY (EX) TASK FORCE
Tuesday, December 9, 2025
2:15 – 3:30 p.m.
Diplomat Convention Center—Grand Ballroom West—Level 2

ROLL CALL

NAIC Member	Participant	State/Territory
Ricardo Lara, Co-Chair	Ricardo Lara, Co-Chair	California
Timothy J. Temple, Co-Chair	Timothy J. Temple, Co-Chair	Louisiana
Peter M. Fuimaono, Co-Vice Chair	Peter M. Fuimaono, Co-Vice Chair	American Samoa
TK Keen, Co-Vice Chair	TK Keen, Co-Vice Chair	Oregon
Mark Fowler	Travis Taylor	Alabama
Heather Carpenter	Heather Carpenter	Alaska
Jimmy Harris	Jimmy Harris	Arkansas
Michael Conway	Michael Conway	Colorado
Jared Kosky	George Bradner	Connecticut
Trinidad Navarro	Christina Miller	Delaware
Karima M. Woods	Sharon Shipp	District of Columbia
Michael Yaworsky	Anoush Brangaccio	Florida
Scott Saiki	Scott Saiki	Hawaii
Ann Gillespie	Ann Gillespie	Illinois
Holly W. Lambert	Holly W. Lambert	Indiana
Doug Ommen	Doug Ommen	Iowa
Vicki Schmidt	Julie Holmes	Kansas
Sharon P. Clark	Sharon P. Clark	Kentucky
Robert L. Carey	Sandra Darby	Maine
Marie Grant	Marie Grant	Maryland
Michael T. Caljouw	Jackie Horigan	Massachusetts
Anita G. Fox	Anita G. Fox	Michigan
Grace Arnold	Peter Brickwedde	Minnesota
Mike Chaney	Andy Case	Mississippi
Angela L. Nelson	Angela L. Nelson	Missouri
Remedio C. Mafnas	Remedio C. Mafnas	N. Mariana Islands
Eric Dunning	Eric Dunning	Nebraska
Ned Gaines	Ned Gaines	Nevada
Justin Zimmerman	Justin Zimmerman	New Jersey

Alice T. Kane	Alice T. Kane	New Mexico
Kaitlin Asrow	Rajesh Bhandula	New York
Mike Causey	Jacqueline Obusek	North Carolina
Jon Godfread	Jon Godfread	North Dakota
Judith L. French	Matt Walsh	Ohio
Glen Mulready	Glen Mulready	Oklahoma
Michael Humphreys	Michael Humphreys	Pennsylvania
Suzette M. Del Valle	Suzette M. Del Valle	Puerto Rico
Elizabeth Kelleher Dwyer	Elizabeth Kelleher Dwyer	Rhode Island
Michael Wise	Diane Cooper	South Carolina
Tregenza A. Roach	Tregenza A. Roach	U.S. Virgin Islands
Kaj Samsom	Rosemary Raszka	Vermont
Scott A. White	Scott A. White	Virginia
Patty Kuderer	Patty Kuderer	Washington
Nathan Houdek	Sarah Smith	Wisconsin
Jeff Rude	Jeff Rude	Wyoming

NAIC Support Staff: Aaron Brandenburg/Libby Crews

AGENDA

1. Consider Adoption of its Summer National Meeting Minutes — Attachment One
   —*Commissioner Ricardo Lara (CA)*

2. Discuss its 2026 Proposed Charges and Updates — Attachment Two
   —*Commissioner Ricardo Lara (CA)*

3. Discuss the Natural Catastrophe Risk Dashboard Report — Attachment Three
   —*Commissioner Timothy J. Temple (LA)*

4. Discuss the Disaster Preparedness Guide Summary — Attachment Four
   —*Commissioner Ricardo Lara (CA)*

5. Hear a Presentation on Private Flood Insurance and Discuss the Flood Insurance Blueprint — Attachment Five
   —*Aaron Brandenburg (NAIC) and Mike Peterson (CA)*

6. Hear an Update on Federal Matters—*Alexander Swindle (NAIC)*

7. Hear an Update from the Center for Insurance Policy and Research (CIPR) Catastrophe Risk Management Center of Excellence (COE) — Attachment Six
   —*Jeff Czajkowski (NAIC) and Mike Peterson (NAIC)*

8. Discuss Any Other Matters Brought Before the Task Force
   —*Commissioner Timothy J. Temple (LA)*

9. Adjournment

1. Consider Adoption of its Summer National Meeting Minutes

Attachment One

–Commissioner Ricardo Lara (CA)

Draft Pending Adoption

Draft: 8/20/25

Climate and Resiliency (EX) Task Force
Minneapolis, Minnesota
August 11, 2025

The Climate and Resiliency (EX) Task Force met in Minneapolis, MN, Aug. 11, 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 (AL); Alan McClain represented by Lori Plant (AR); Michael Conway represented by Jason Lapham (CO); Andrew N. Mais represented by George Bradner (CT); Karima M. Woods represented by Sharon Shipp (DC); Trinidad Navarro represented by Christina Miller (DE); Michael Yaworsky represented by Jane Nelson (FL); Scott Saiki represented by Jerry Bump (HI); Doug Ommen (IA); Ann Gillespie (IL); Holly W. Lambert represented by Alex Peck (IN); Vicki Schmidt represented by Craig Van Aalst (KS); Sharon P. Clark represented by Shawn Boggs (KY); Michael T. Caljouw represented by Jackie Horigan (MA); Marie Grant represented by Greg Ricci (MD); Robert L. Carey (ME); Grace Arnold represented by Peter Brickwedde (MN); Mike Chaney represented by Andy Case (MS); Mike Causey represented by David Yetter (NC); Jon Godfread (ND); Justin Zimmerman represented by William Rader (NJ); Ned Gaines (NV); Adrienne A. Harris represented by Rajesh Bhandula (NY); Judith L. French (OH); Michael Humphreys (PA); Alexander S. Adams Vega represented by Maria Morcelo (PR); Elizabeth Kelleher Dwyer represented by Mariel Garcia (RI); Michael Wise (SC); Tregenza A. Roach (VI); Kaj Samsom represented by Rosemary Raszka (VT); Patty Kuderer (WA); Nathan Houdek (WI); and Jeff Rude (WY). Also participating were Cassie Brown (TX).

1. Adopted its Spring National Meeting Minutes

Commissioner Temple made a motion, seconded by Van Aalst, to adopt the Task Force's March 26 (*see NAIC Proceedings – Spring 2025, Climate and Resiliency (EX) Task Force*) minutes. The motion passed unanimously.

2. Received an Update on the *Disaster Preparedness Handbook*

Commissioner Lara said the Task Force has a priority in the *State Connected* strategic plan to bring together the lessons learned as a regulator on risk mitigation, communication with the public, and forward-looking policies in the wake of disasters. He said the experience of the current group of U.S. state regulators is significant and diverse, and the goal of the Task Force is to transmit much of that knowledge to other regulators so that their reaction times are quick and responsive to the needs of consumers. Since the Task Force met at the Spring National Meeting, NAIC members have experienced flooding in Texas and in the eastern states, running from Florida to Rhode Island; windstorms in the Midwest, including derechos and severe convective storms; and wildfires throughout the West, including the largest fire in Arizona, multiple large fires in Utah, and ferocious fires in California, Colorado, Hawaii, New Mexico, Oregon, and Washington. He said the work of the Task Force and the Center of Excellence (COE) helps build knowledge, collaboration, and oversee more resilient markets.

Commissioner Temple said after the Spring National Meeting, the Task Force asked regulators to join a drafting group that would create the outline of this guide. With the participation of 11 states, this drafting group met on April 25, June 18, July 9, and July 30. The outline of the guide is attached to the materials. The purpose of the guide is to provide an overview of disaster preparedness, information on pre-disaster education, information on the state insurance regulatory response post-disaster, useful after-action reports for future preparedness, common questions from the public and local officials, and state-specific case studies.

Commissioner Temple said during the meetings, the drafting group heard a presentation from North Carolina about its recent response to Hurricane Helene and from California on its responses to the wildfires. NAIC staff have set up a SharePoint site so that regulators can collaborate on drafting this document. The drafting group

plans to meet regularly to continue discussions and discuss drafting progress. The anticipated completion date for a full draft is by the Fall National Meeting. The outline shows the drafting group focusing on state-level examples and several reports by the Insurance Institute for Business & Home Safety (IBHS), including its post-disaster reports on recent disasters in California, Colorado, and Hawaii, as cornerstones for this work.

Director Wise said South Carolina has a big focus on education, and while education has been focused on coastal areas traditionally, recent storms have shown the need for education in the western part of the state. He said the department has worked to build out a strategic communication plan that focuses on what a policy covers and how deductibles work, among other things. The department has engaged with other stakeholders to build relationships and increase the audience at community events. The discussion around mitigation grant programs is increasingly important. Wise said the South Carolina Department of Insurance (DOI) has prepared an internal disaster response plan that includes media and messaging materials, education materials, and bulletin templates to be deployed immediately following a disaster.

Amy Bach (United Policyholders—UP) said that since departments have varying resources, the collaboration in a project like this *Disaster Preparedness Handbook* (Handbook) will be practical. Bach said UP has jointly published rack cards with many state insurance departments that give brief highlights on the important pieces of an insurance policy for consumers. She said UP also participates in webinars hosted by insurance departments on a regular basis. Bach said she would encourage uniformity around an increase in the time limit for additional living expenses (ALE). She said it is important for out-of-state adjusters to be well-trained in the laws of the state in which they are responding.

Ken Klein (NAIC Consumer Representative) encouraged the Task Force to pay attention to how building code upgrades affect the adequacy of coverage. Klein asked for clarification on how the Task Force intends to outline the measurement of underinsurance post-disaster. Peterson said this Handbook would not gather data on underinsurance but would flag common issues among states and what lessons states have learned.

Dave Snyder (American Property Casualty Insurance Association—APCIA) said the Geneva Association has recently released a study that illustrates the role of state, local, and federal governmental agencies in planning and disaster response. He said he would like to see the Handbook include outreach and work with other agencies. He said he would like the Task Force to include how insurance companies can be given flexibility to tailor their coverages to people's needs to deliver more insurance to more people.

3. Received an Update from the CIPR on the COE

Jeff Czajkowski (Center for Insurance Policy and Research—CIPR) said one of the core pillars of the Catastrophe Risk Management Center of Excellence (COE) is education and training. He said catastrophe modeling courses, CAT 101 and CAT 201, are available through the NAIC Compass platform. He said future courses are being developed, including the CAT and Climate Risk Course for Financial Regulators, the Use of CAT Models in P/C Rate Filings, Reinsurance and Alternative Risk Transfer, and Resilience. He said the COE team now includes four full-time employees who have more than 50 years of combined catastrophe risk management experience.

Brian Powell (CIPR) said the COE has developed a resilience hub that serves to engage with state insurance commissioners on establishing resilience plans and programs in their respective states. This includes developing legislative strategies and language to support the department through the entire legislative process. The resilience hub also works to design the grant programs and continually supports the program as efforts continue. Powell said increasing demand for resources requires a consistent approach to provide effective support for commissioners and partners. He said there is a need for consistency in the approach to program development. Design and implementation are imperative to provide expected interaction for the insurance industry and all

stakeholders, and in the approach to program design and operation, it is imperative to provide expected outcomes.

He said partners in this space are developing standard approaches to support mitigation and resilience initiatives as an effective tool for determining and deploying resources. He said there is demand for cross-communication and problem-solving resources from the CAT COE Resilience Hub.

Powell said there are currently four programs that are issuing wind mitigation grants, and a number of other states that have the legislative authority to implement this program. He said there are also states that are going beyond wind mitigation, including states looking at wildfire mitigation.

Czajkowski said the COE has the resources to help establish the retrofit and resilience grant programs, perform catastrophe risk assessments, calculate mitigation premium discounts, assist with rate filing and reinsurance review, and work on program enhancements. The COE has the capabilities to run catastrophe models to support the states in these endeavors. Czajkowski showed an example of homeowners market data overlaid with Federal Emergency Management Agency (FEMA) national risk index data and catastrophe model information to help states think through risk assessment and prioritization.

4. Received an Update on the Natural Catastrophe Risk Dashboard Commissioner

Commissioner Lara said the Natural Catastrophe Risk Dashboard was developed beginning in 2024. He said a drafting group was formed following the 2024 Summer National Meeting, and regulators from 12 states participated in the further development of the dashboard and a summary report. The Task Force held a regulator-only meeting on June 30 to review the dashboard. He said the goal of the dashboard is to be a tool for regulators, while the report would be a public-facing summary of the trends captured in the dashboard. Neither the dashboard itself nor the public-facing summary will identify individual state data. He said the dashboard uses national metrics meant to understand the national issues of catastrophes and protection gaps. The dashboard is in the final stages of revisions and will be considered at a future meeting of the Task Force.

5. Received an Update on the Alabama DOI and CRIR Report

Commissioner Fowler said the Strengthen Alabama Homes program gave out its first grant in 2016, and they have now given 9,200 grants worth $91 million with about 60,000 fortified homes in the state. He said Hurricane Sally was the first major hurricane to travel over a large number of fortified roofs. He said, following the storm, property/casualty (P/C) insurers reporting from coastal counties indicated that the roofs had performed as advertised against the hurricane winds. He said the department worked with Lars Powell from the University of Alabama's Center for Risk and Insurance Research (CRIR) to develop a data call that would collect data on the performance of the roofs in these areas. He said the data confirmed the greater-than-expected performance of the roofs and that a majority of the claims were coming from tree fall instead of wind damage.

Lars Powell said the fortified houses reduced the frequency of losses by 55% to 75% and reduced the severity of losses by 20% to 40%. The data found that if this program had been started 30 to 50 years ago and the majority of the housing stock was at the Fortified Gold Level, the amount of deductibles paid by consumers would have been about 65% less. He said the data aligns with the predictions from the IBHS lab and catastrophe models, which gives confidence that these findings can be extrapolated for use in other scenarios. Powell emphasized that other states considering risk mitigation programs should reach out to the Alabama Department of Insurance (DOI) and the CRIR for guidance.

Commissioner Temple said the average person who gets a fortified roof from the grant program saves about 31% on their homeowners insurance if they keep coverage the same. He said many people had lower coverage before getting a fortified roof but were able to pay less and have more coverage after.

Horigan asked about best practices for engaging with contractors. Powell said the COE's Resilience Hub will help connect regulators with IBHS and their partners, who will train contractors and help with education for a holistic approach. Commissioner Temple said early engagement with contractors will help with buy-in of the program.

6. Received an Update on the P/C Reinsurance Roundtable

Jeff Johnston (NAIC) said a roundtable was held in Pasadena, CA, with the intent to deepen the understanding of how reinsurance market dynamics affect affordability, availability, and resilience in the homeowners and business insurance markets. He said 40 insurance departments were represented, and the sessions included experts on catastrophe modeling and reinsurance. He said Commissioner Godfread identified three general strategic objectives that will be pursued by the Reinsurance (E) Task Force: 1) continue to build knowledge, 2) strengthen collaboration, and 3) lead in shaping the market and resilience.

Johnston said with respect to building knowledge, there will be an expansion of regulator training in the areas of reinsurance, catastrophe modeling, and alternative risk transfer. He said the NAIC will pursue external partnerships with the Reinsurance Association of America (RAA), Swiss Re, and The Institutes to bring in their expertise and training. With respect to strengthening collaboration, Johnston said cross-state data sharing on catastrophe exposures and reinsurance structures will continue, and resources within the COE for joint catastrophe modeling will be utilized. With respect to leading in shaping the market and resilience, Johnston said the NAIC will continue to promote scale resilience and retrofit programs, encourage innovation and risk transfer mechanisms, and integrate resilience and mitigation into solvency and rate setting processes.

7. Heard a Presentation from Ceres on the Climate Risk Disclosure Survey Dashboard

Steven Rothstein (Ceres) said that since the adoption of the Task Force on Climate-Related Financial Disclosures (TCFD) aligned disclosure reporting by the NAIC, Ceres has released analysis reports of the survey findings. He said the survey asks questions on governance, strategy, risk management, and metrics and targets. The latest report shows 99% of insurers have outlined plans for risk management, but only one-third of the companies are reporting their metrics and targets for climate risks. He said the climate risk disclosure survey is important because companies that are more aware of their risks will do more to protect themselves and their customers.

Rothstein said in a report released this year, Ceres is looking specifically into the metrics and targets category to understand specific examples of the work being done in this area. The report provides actions the industry can take to close the measurement gap between setting climate targets and outlining specific goals to achieve those targets. He said it is also important for companies to have transition plans for where they want to be in five, 10, and 20 years from now and how they plan to get there.

Rothstein said Ceres is able to work individually with state insurance departments to understand the tools available to analyze the information found in the survey responses.

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

SharePoint/Staff Hub/Committees/Member Meetings/EX/2025_Summer/CASTF/081125 CRFT Minutes SuNM.docx

2. Discuss its 2026 Proposed Charges and Updates

Attachment Two

–Commissioner Ricardo Lara (CA)

Draft: 12/9/25
Adopted by the Executive (EX) Committee and Plenary, Jan. __, 2026
Adopted by the Natural Catastrophe Risk and Resilience (EX) Task Force, Jan. __, 2026

2026 Proposed Charges

The Task Force will serve as the primary coordinating body for regulatory actions, engagement, communication, and discussions related to natural catastrophe risk and resilience. This includes facilitating dialogue among state insurance regulators, industry representatives, and other stakeholders. The Task Force will address a wide range of catastrophe risks, including, but not limited to, atmospheric rivers, wind, water, wildfires, severe convective storms, hail, hurricanes, landslides, and earthquakes.

1. **The Natural Catastrophe Risk and Resilience (EX) Task Force** will:

   A. Implement the deliverables outlined in the NAIC National Climate Resilience Strategy for Insurance and efficiently coordinate its operationalization, implementation, and communication initiatives.
   B. Serve as the coordinating body for discussions and engagement on matters related to natural catastrophe risk and resilience.
   C. Assess existing and proposed financial regulatory strategies aimed at addressing natural catastrophe risk and enhancing resilience.
   D. Coordinate communications regarding catastrophe risk and resilience, solvency strategies and tools, as well as mitigation programs and discounts.
   E. Act as a catalyst and repository for innovative ideas and vision development for the NAIC Center of Excellence on Catastrophe Modeling and Risk Management, focusing on future resources and services for members.

2. **The Pre-Disaster Mitigation & Risk Modeling Working Group** will:

   A. Create and coordinate resilience tools to assist state regulators in developing, enhancing, and maintaining state-based mitigation grant programs, ensuring consistency while allowing for state-specific adaptations to local priorities.
   B. Analyze how natural catastrophe models assess risks to identify priority areas for community risk mitigation and advocate for additional funding.
   C. Collaborate with the NAIC Catastrophe Risk Management Center of Excellence (CAT COE) to establish research priorities in risk and mitigation, analyze long-term scenarios and strategies related to insurer solvency, provide specific training on catastrophe modeling and reinsurance strategies, and enhance communication regarding risk reduction.
   D. Develop formal coordination protocols between state departments of insurance and their respective State Emergency Management Agencies (SEMAs), recognizing SEMAs as primary applicants for FEMA pre-disaster mitigation grant programs (e.g., BRIC). This includes jointly identifying insurance-relevant mitigation priorities, aligning project proposals with insurance market objectives, and coordinating participation in FEMA grant application processes.

E. Build partnerships with stakeholders involved in implementing and supporting risk mitigation actions.
F. Create communication materials addressing adaptation, resilience, and mitigation issues and solutions.

3. **The Severe Peril Working Group** will:

A. Examine, analyze, and monitor insurance protection gaps by peril, including hurricanes, wildfires, atmospheric rivers, and severe convective storms, as well as overall market conditions in current and potential future scenarios.
B. Track the emergence of innovative insurance policy solutions, such as inclusive and parametric insurance products, that enhance resilience to natural catastrophes and address identified protection gaps and insurance market issues.
C. Leverage the experiences of insurance regulators regarding specific perils to share knowledge with fellow state regulators and future commissioners.
D. Launch a national initiative to raise awareness of flood risk and risk mitigation strategies, incorporating the latest scientific research, technology, and mitigation efforts, along with available flood insurance options.
E. Establish partnerships with national and international non-governmental organizations and universities to create innovative recovery and rebuilding programs targeting underinsured or uninsured communities.

NAIC Support Staff: Butch Kinerney/Aaron Brandenburg/Libby Crews

3. Discuss the Natural Catastrophe Risk Dashboard Report

Attachment Three

–Commissioner Timothy J. Temple (LA)

NAIC
NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

CLIMATE and RESILIENCY TASK FORCE

U.S. Insurance Industry

NATURAL CATASTROPHE RISK DASHBOARD

As of December 31, 2024

Published: November, 2025

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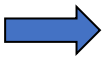
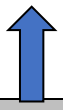
Natural Catastrophe Risk Dashboard Summary

Risk Category	Trend	Summary of Assessment
Physical Risk		
Physical-Historical **Frequency** **Insured Losses**		Driven by the high frequency of events and elevated economic and insured losses.
Physical-Prospective **Modeled losses**		The magnitude of modeled losses in terms of dollars is significant, tempered by the insurance industry's capital to absorb potential losses.
Physical-Meteorological **Factors**		The largest temperature increases were observed in 2023 and 2024. Sea levels and GHG continue to rise at a record pace.
Transition Risk		
Investment Concentration		Invested assets are not highly concentrated in any potentially impacted sector
Coverage Trends		
Private market trends **Rates/Premiums** **Protection Gap**		Significant increase in Homeowners insurance rates and reinsurance rates. Continued elevated non-renewal rates.
Flood **FEMA/NFIP** **Private Flood**		NFIP flood coverage gaps continue to increase. The protection gap is significant but stable.
Residual Markets **FAIR & Beach Plans** **Surplus Lines**		Significant increase in residual markets direct premium written, tempered by the low percentage of the private HO market.

Risk Assessment Scale/Legend

	High
	Moderate-High
	Moderate-Low
	Low

Trend Scale (Trend of the risk**)**

Significant Increase	
Increase	
Stable	
Decrease	
Significant Decrease	

Executive Summary

The Climate and Resiliency Task Force of the National Association of Insurance Commissioners (NAIC) led by state regulators adopted the "National Climate Resilience Strategy for Insurance" report in March 2024. Action 1 of the report calls for the launch of a comprehensive NAIC Climate Risk Dashboard and led to the creation of this report. This monitoring tool provides information on an annual basis to regulators on the national metrics related to catastrophe risk and insurance markets. Going forward we shall refer to this report and the corresponding processes, the Natural Catastrophe Risk Dashboard.

Insurance issues (including affordability and availability) have become more prominent in the public and press, with questions coming to U.S. state insurance regulators from local government officials, state officials, Congress and federal agencies. This Dashboard creates a common set of metrics for understanding Natural Catastrophe protection gaps, providing state insurance Commissioners with current information that can be used in press releases and responses to questions from state agencies. This Dashboard also provides access to readily available information when national publications like A.M. Best publish statistics about U.S. insurance markets, which will benefit regulator planning for rapid communications. As insurance regulators look for opportunities to respond quickly and consistently to questions about state insurance markets, this Dashboard is a tool that Commissioners can rely on for understanding and response, and to increase awareness of protection gap challenges nationwide. Additionally, individual state experiences can be put in a broader context for policy decisions.

For insurance regulators, this report and the Natural Catastrophe Risk Dashboard is a reference tool for overall US market indicators being used by banks, insurers, reinsurers and federal governments, putting national metrics in a centralized location for regulators to inform internal and external decision-making, and for discussions with international regulators. The rapid growth in the number of reports and national information could create a strain on individual departments to keep up with national-level information in a standardized way, making this tool valuable for Insurance Commissioners needing national risk information at their fingertips.

For example, when a natural catastrophe occurs in one jurisdiction, it is common for researchers, agencies, and industry groups to put the costs in the context with risk information, past catastrophes, or trends. With this Dashboard, Commissioners will have pre-loaded information to use for communications in the near-term, or long-term planning. With this information, insurance regulators are laying the foundation for better understanding protection gaps, insurance trends, and the economic impact of national catastrophe risk and resilience trends.

Overall, the U.S. insurance industry continues to be challenged by changing environmental and economic conditions. Environmental factors like cycles of drought and deluge, extreme temperatures, both hot and cold, and global economic trends impact local conditions within U.S. jurisdictions. Recent years have demonstrated that catastrophes are a national issue and therefore our understanding of catastrophe risk and ways to reduce that risk is a national priority. With this Dashboard, regulators will continue to be prepared with important information when unanticipated events occur and the public turns to regulators for guidance and response.

Insurers and their state regulators play a key role in U.S. financial stability by providing policyholders the ability to manage natural catastrophe risk. The availability and affordability of insurance and its interconnectedness with other areas of the U.S. economy underscores the importance of a functioning insurance marketplace. We employ several measures in the Coverage trends section in an attempt to

measure availability and affordability. Affordability is a challenge to measure, and we hope to enhance these measures in future versions of this report.

On a positive note, aggregate capital levels in the property insurance industry continue to provide a significant buffer above regulatory capital requirements to absorb natural catastrophe risk.

Several risks drove the regulator's views when conducting the risk assessment:

Physical risk – Increased frequency, elevated catastrophe losses and significantly increasing meteorological measures drove the Moderate-high assessment.

- The number of events, especially severe convective storms, increased significantly and exceeded historical averages. In terms of severity, severe convective storms led the way followed by drought and flooding. Economic and insured losses reached all time highs in 2024 and well above historical averages. Catastrophe losses continue to increase as a percentage of overall insurer losses.

- The magnitude of modeled losses in terms of dollars is significant, tempered by the insurance industry's capital and surplus to absorb potential losses. This risk indicator provides a forward-looking prospective measure for the severity of natural catastrophe risk.

- Large temperature increases were observed in 2023 and 2024. The largest temperature increase since records have been maintained beginning in 1850 was observed in 2024.

Transition risk – Transition risk encompasses transition risk in insurers investment portfolios and is currently limited to stocks and bonds.

This report includes an analysis that uses a common methodology, known as the Battiston methodology, to identify climate-affected investments and estimate the relative percentages of investments, and therefore financial exposure, among major economic sectors.

Coverage trends –

- Most risk and insurance indicators indicate multi-year increases in metrics of concern, such as policyholder rate increases, non-renewals, residual markets and insurer insolvencies due to natural catastrophe related causes. Policyholder rate increases saw double digit growth for a national average of 12.7% and 10.4% in 2023 and 2024 respectively, and over a 20% increase in some states for both years.

- NFIP flood coverage gaps continue to increase. Protection gap measures are stable and the number of NFIP policies continues to decline.

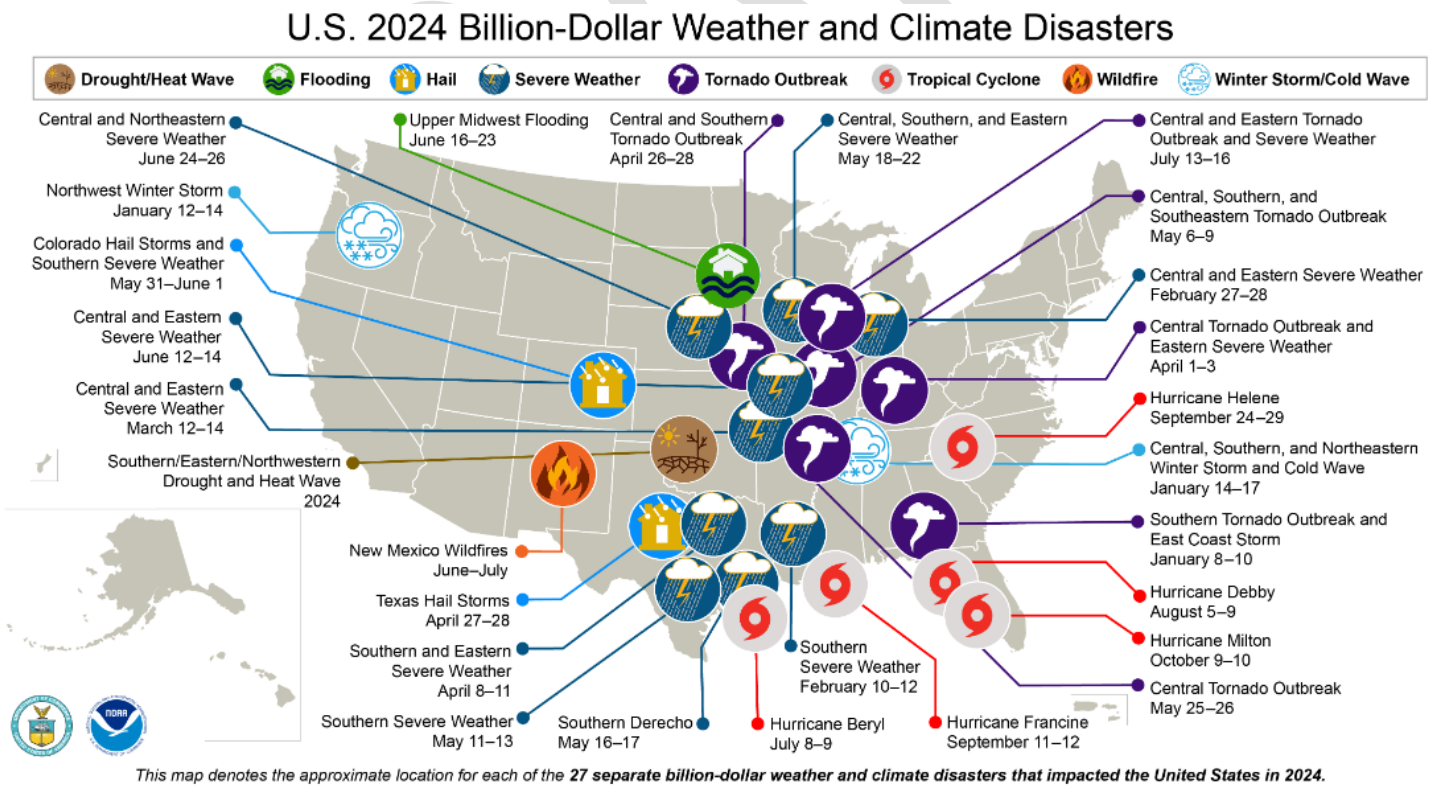
- FAIR and Beach plans and Excess and Surplus Lines experienced premium growth of 6% and 32% respectively in 2024. Additionally, the FAIR and Beach plans and Excess and Surplus Lines market share continued to grow as a percentage of the homeowners insurance market.

Physical Risk Summary

Increased frequency, elevated catastrophe losses and significantly increasing meteorological measures drove the Moderate-High assessment. The number of events, especially severe convective storms, increased significantly and exceeded historical averages. In terms of severity, severe convective storms were responsible for the largest dollar amount of losses followed by drought and flooding. In 2024 economic losses were the third highest since 1999, insured losses were the second highest and well above historical averages. Economic losses as a percentage of U.S. GDP increased significantly and provides some context for the $190 billion in economic losses.

Modeled losses have not varied significantly over the past five years. This risk measure provides a forward-looking prospective outlook for the severity of natural catastrophe risk. We look at modeled losses as a percentage of capital and surplus to provide some perspective on the shear dollar amount of modeled losses.

In terms of meteorological measures, 2024 saw the largest increase in temperatures since 1850, when records began being maintained. Additionally, sea levels continue to rise at record levels. The greenhouse gas index, although elevated, has been somewhat stable. The Actuaries Climate Index (ACI) is also employed as a measure and is elevated in recent years. The ACI is composite index incorporating temperature, rainfall, drought wind and seal level measures.



*This map denotes the approximate location for each of the **27 separate billion-dollar weather and climate disasters that impacted the United States in 2024.***

Physical Risk-Historical

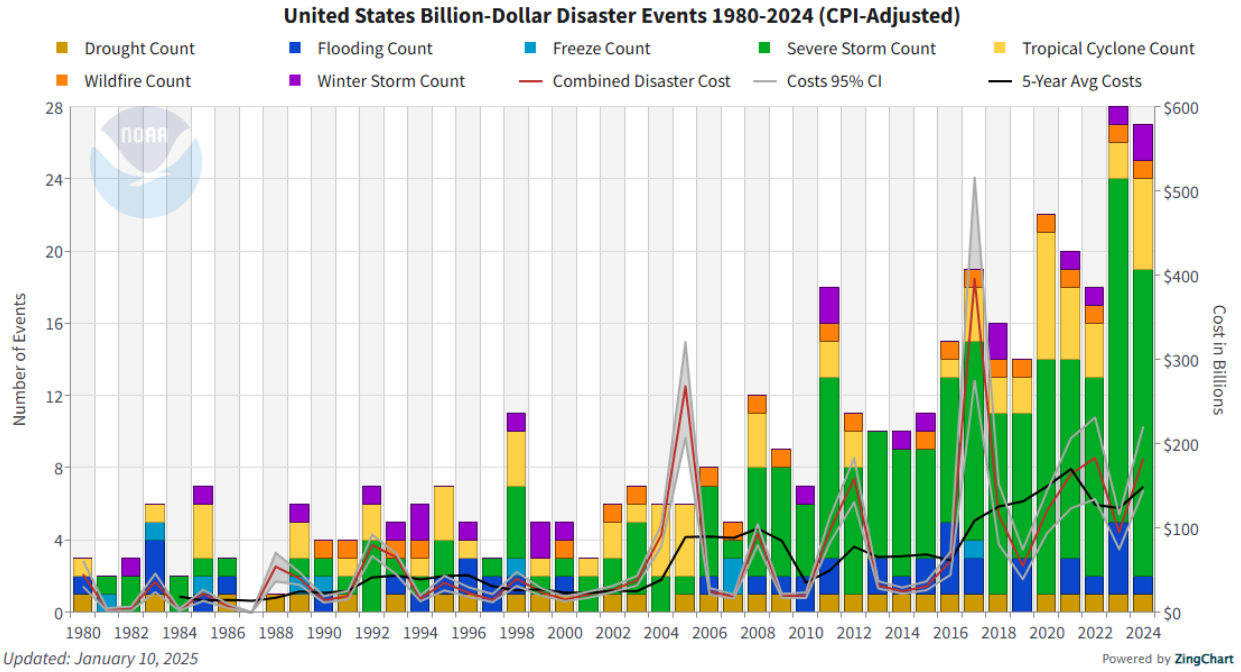
Assessment Level: **Moderate-High**	Trend: **Increasing**

The individual risk indicators that drove the Moderate-High assessment are presented below.

Frequency & Victims

The U.S. has sustained 403 weather and climate disasters since 1980 where overall damages/costs reached or exceeded $1 billion (including CPI adjustment to 2024). The total cost of these 403 events exceeds $2.915 trillion.

In 2024, there were 27 (28 in 2023) confirmed weather/climate disaster events with losses exceeding $1 billion each to affect the United States. These events included 1 drought event, 1 flooding event, 17 severe storm events, 5 tropical cyclone events, 1 wildfire event, and 2 winter storm events. Overall, these events resulted in the deaths of 568 people. The highest number of events (28) since 1980 was recorded in 2023. The 1980–2024 annual average is 9.0 events (CPI-adjusted); the annual average for the most recent 5 years (2020–2024) is 23.0 events (CPI-adjusted) according to NOAA*

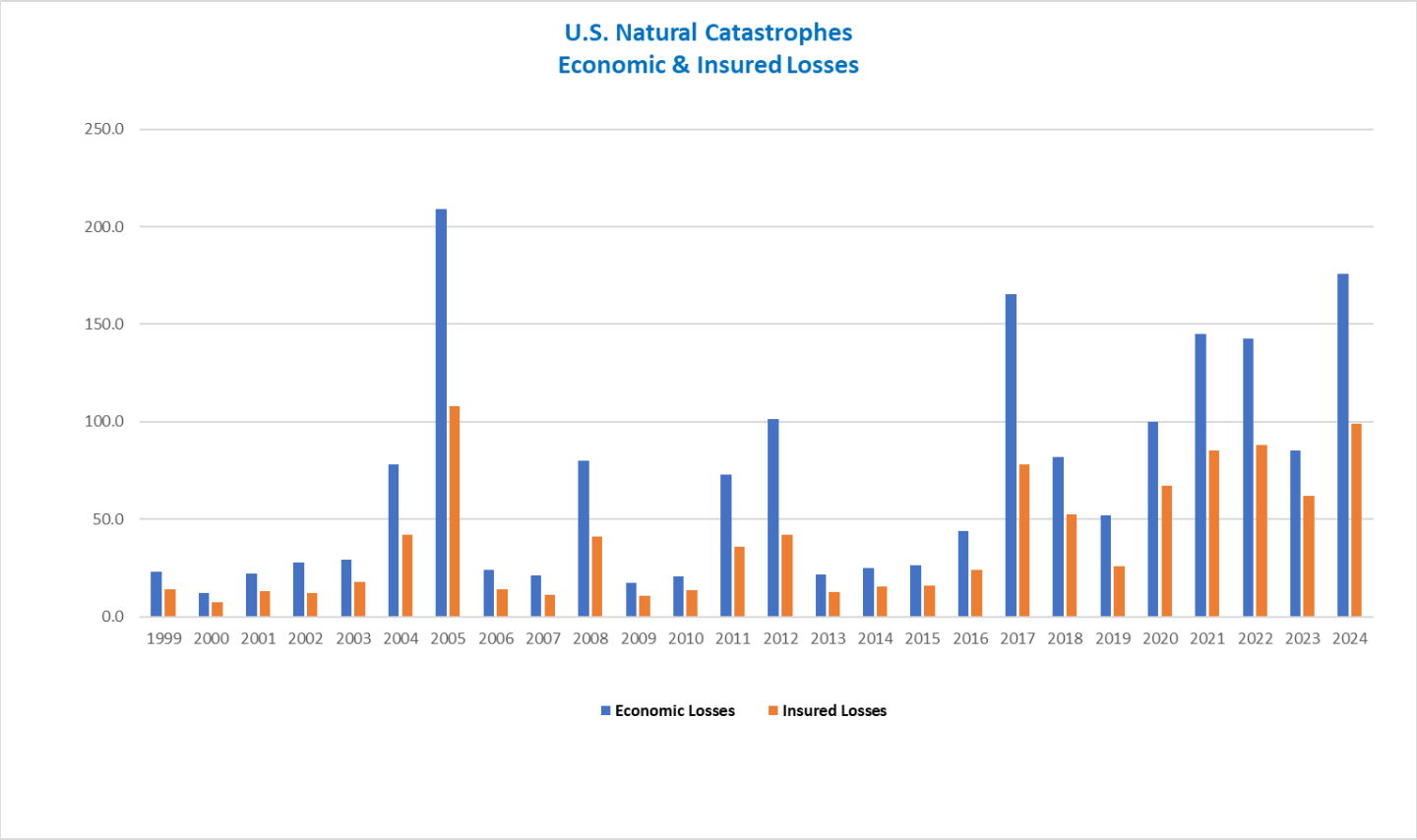


*-NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2025). https://www.ncei.noaa.gov/access/billions/, DOI: 10.25921/stkw-7w73

The following link will allow one to sort by peril, by state and by region:
https://www.ncei.noaa.gov/access/billions/time-series

Economic and Insured Losses

In 2024 economic losses were the third highest since 1999 at $176B, insured losses were the second highest at $99B and well above historical averages.

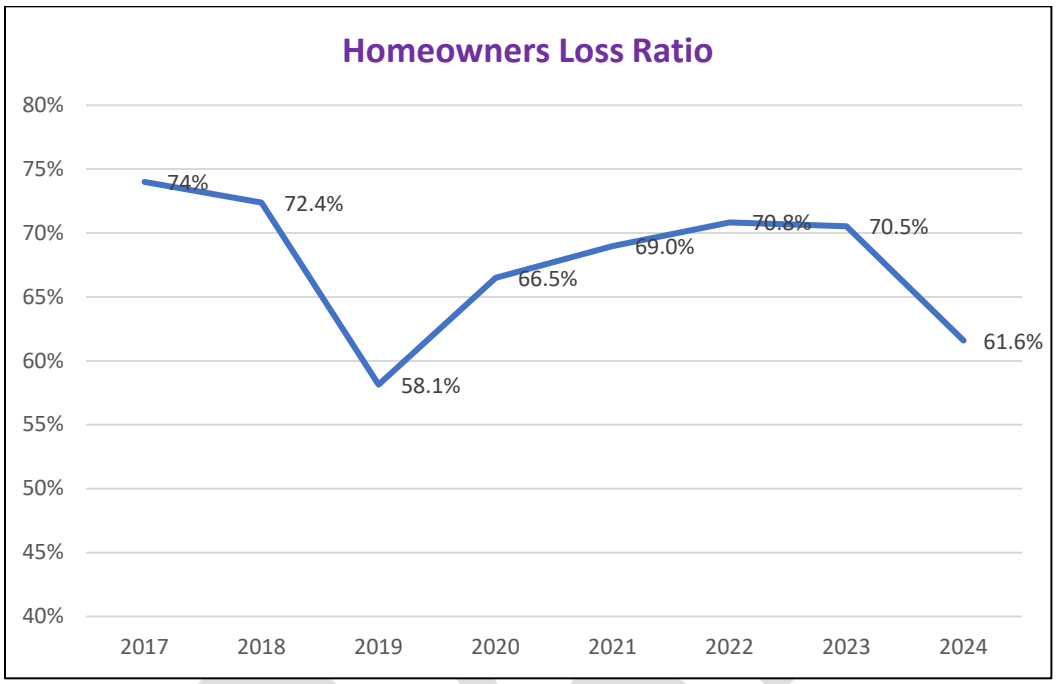


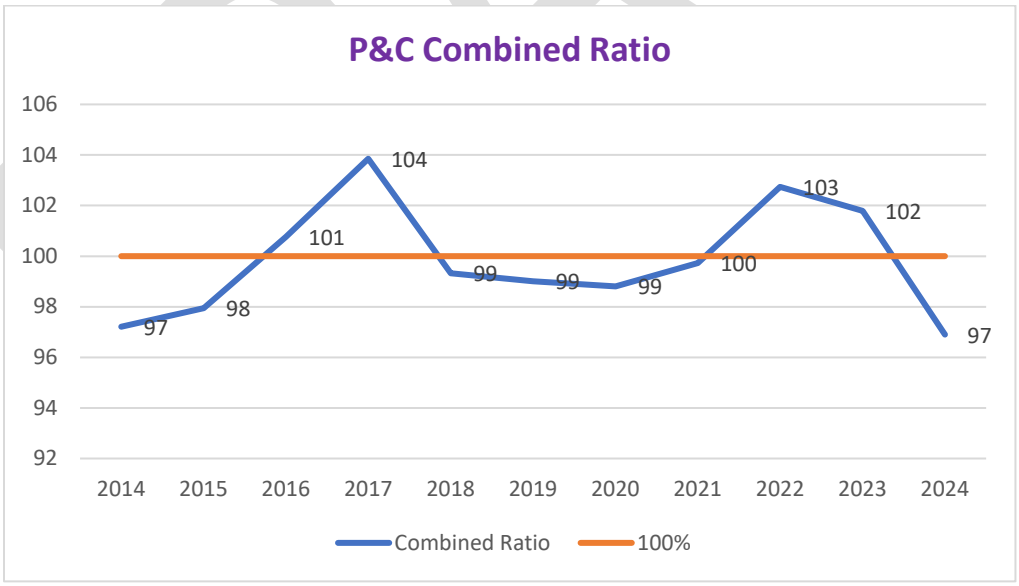
Source: Insurance Information Institute, Munich Re

Note the above data has not been adjusted for inflation or loss development after the initial figures were published.

HO Loss Ratio and P&C Combined Ratio

Although the P&C combined ratio incorporates lines of business that may not be affected by natural catastrophes, the ratio and the HO loss ratio are highly correlated to years with increased natural catastrophes.





Source: NAIC

Modeled/Prospective losses

Modeled losses have not varied significantly over the past five years. This risk measure provides a forward-looking prospective outlook for the severity of natural catastrophe risk.

Assessment Level: **Moderate-Low**	Trend: Stable →

NFIP Model loss below represents the U.S. 1/250 OEP modeled flood loss in billions of dollars, for both Surge/Coastal and Inland (fluvial and pluvial).

The R-CAT 1/100 Net refers to the modeled loss for hurricane Net of reinsurance. A capital charge is applied to insurers for their net 1/100 modeled loss. The risk measure employed here is the aggregate of all insurers who reported a modeled net 1/100 loss as a percentage of the total capital of the same cohort of insurers.

The higher percentage noted in 2022 was driven primarily by the lower capital and surplus, not by an increase in modeled losses. Although the aggregate dollar amount has some utility, we felt best to put the dollar exposure into context by using a percentage of capital and surplus.
The R-CAT 1/100 Ceded % shows the percentage of the Gross 1/100 modeled loss that was ceded to a reinsurer.

	2024	2023	2022	2021
NFIP Model loss-Surge	Not available	$28.4	$26.4	$26.7
NFIP Model loss-Inland	Not available	$8.9	$8.2	$7.4
R-CAT 1/100 Net % C&S	6.7%	7.5%	9.7%	7.5%
R-CAT 1/100 Ceded %	66.7%	66.5%	67.7%	68.8%

Source: NFIP and NAIC

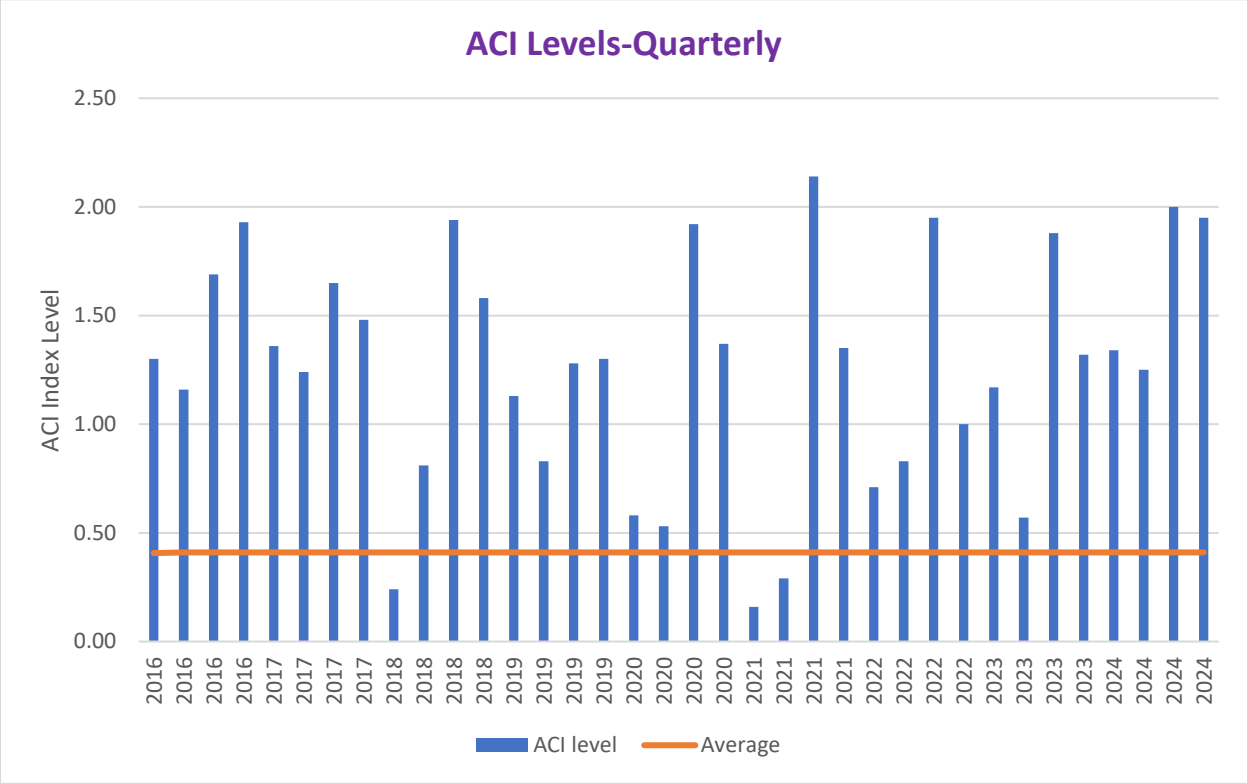
Physical-Meteorological Summary

In 2024, the largest increase in temperature and sea levels were observed since records have been maintained beginning in the late 1800's and is the driver of the High assessment.

Assessment Level: **High**	Trend: **Significant Increase** ↑

ACI Level

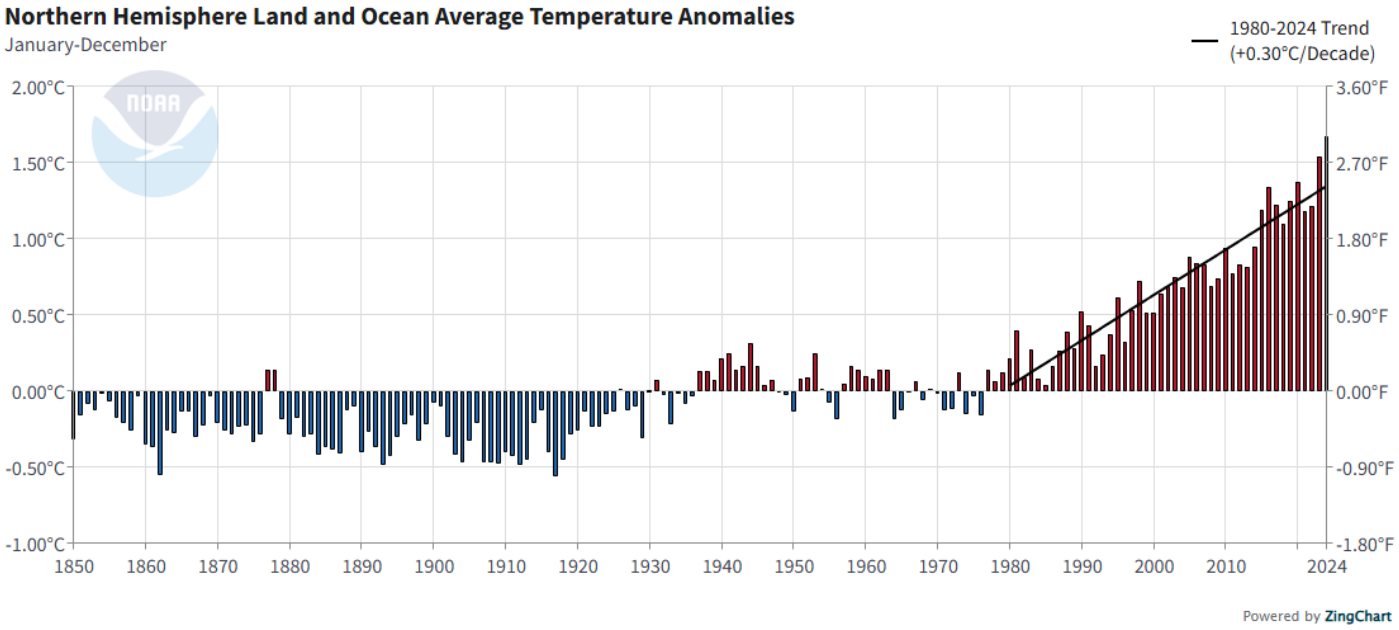
The Actuaries Climate Index (ACI) is intended to provide a useful monitoring tool as an objective indicator of the frequency of extreme weather and the extent of sea level change. Their website provides graphics and data for download for those who wish to explore the Index. The ACI is available for the United States and Canada and 12 subregions thereof and will be released when analysis of data for each meteorological season is complete, on both a monthly and a seasonal basis (months ending February, May, August, and November). The Actuaries Climate Index incorporates temperature, rainfall, drought wind and seal levels.



Source: The Actuary Climate Index (ACI), updated quarterly.

Temperature Change

In 2024 the largest increase in temperature was observed in the Northern Hemisphere, Land and Ocean. The graph below delineates the temperature departure from the average temperature since 1850. In 2024 the average temperature was 1.67^0 C above average. Also, highlighted in the graph is the significant increasing trend from 1980 to the present.



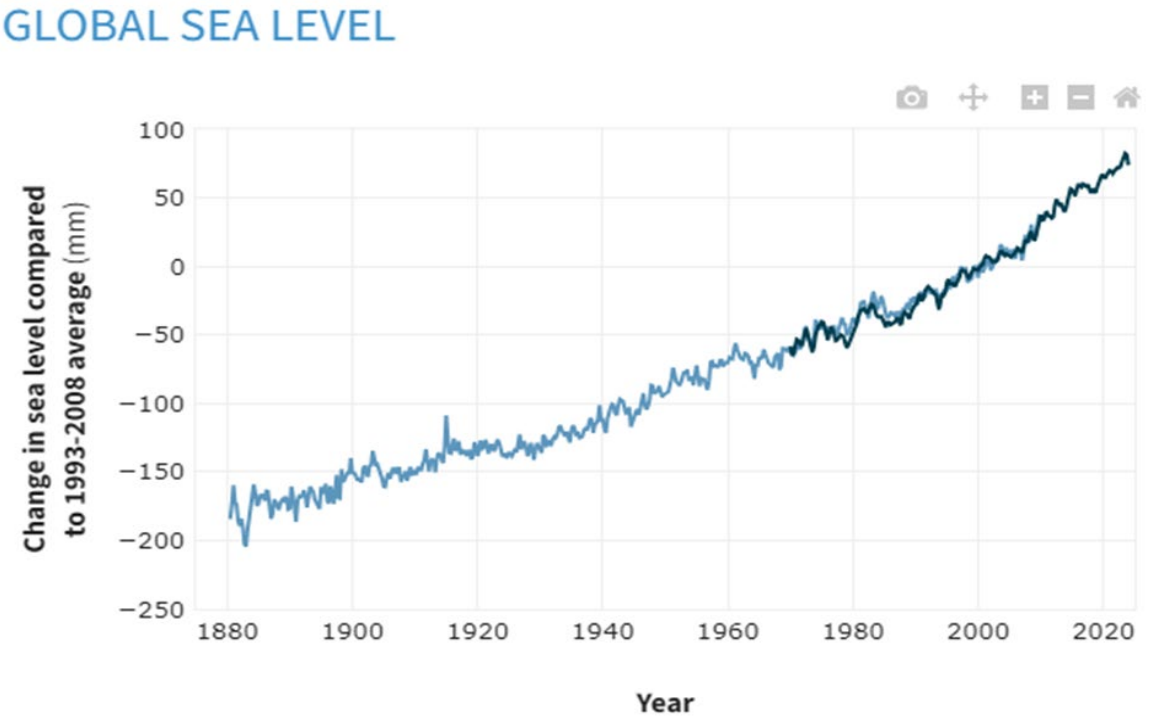
Source: NOAA

Sea Level Change

In 2023, global average sea level set a new record high—101.4 mm (3.99 inches) above 1993 levels. The average sea level from 1993 to 2008 was adopted as the base period for NOAA's calculations. The rate of global sea level rise is accelerating: it has more than doubled from 0.06 inches (1.4 millimeters) per year throughout most of the twentieth century to 0.14 inches (3.6 millimeters) per year from 2006–2015.

The chart below delineates Global Sea Level change. However, in many locations along the U.S. coastline, the rate of local sea level rise is much greater than the global average due to land processes like erosion, oil and groundwater pumping. High tide flooding is now three to nine times more frequent than it was 50 years ago according to NOAA Climate.gov.

By the end of the century, global mean sea levels are likely to rise at least one foot (0.3 meters) above 2000 levels, even if greenhouse gas emissions follow a relatively low pathway in coming decades.



Seasonal (3-month) sea level estimates from Church and White (2011) (light blue line) and University of Hawaii Fast Delivery sea level data (dark blue). The values are shown as change in sea level in millimeters compared to the 1993-2008 average. NOAA Climate.gov image based on analysis and data from Philip Thompson, University of Hawaii Sea Level Center.

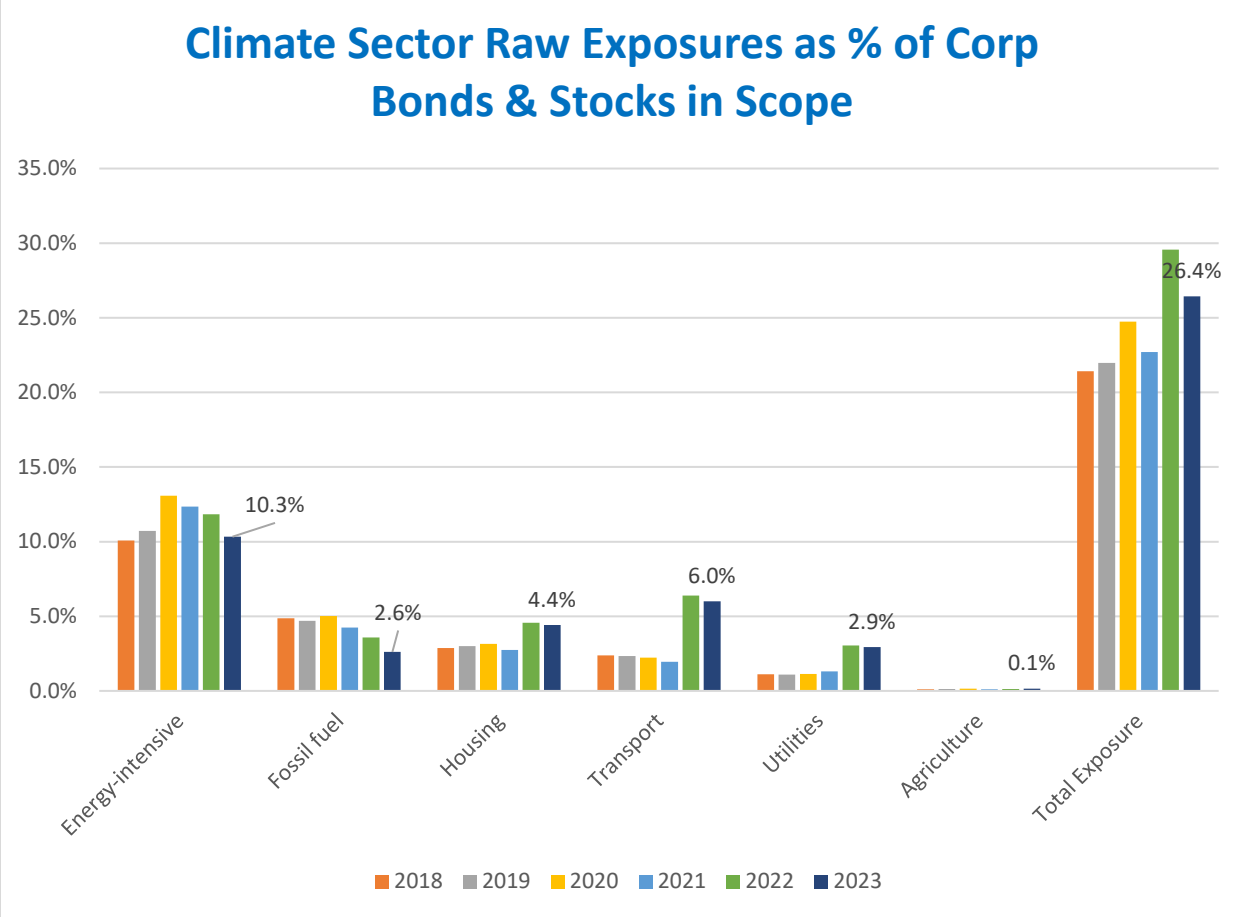
The early part of the time series shown in the graph above comes from the sea level group of CSIRO (Commonwealth Scientific and Industrial Research Organization), Australia's national science agency. They are documented in Church and White (2011). The more recent part of the time series is from the University of Hawaii Sea Level Center (UHSLC). See NOAA link below for more details on the data.
Source: NOAA

Transition Risk Summary

Transition risk encompasses transition risk in insurers investment portfolios and is currently limited to stocks and bonds. This report includes an analysis that uses a common methodology, known as the Battiston methodology, to identify climate-affected investments and estimate the relative percentages of investments, and therefore financial exposure, among major economic sectors. The relatively low proportion of insurer investments in climate-affected industries is a driver of the low rating. Additionally, the perceived slower onset of climate related risk in invested assets and the ability to reallocate investments contributes to the Low assessment.

State regulators may access the U.S. Insurance Industry Climate Affected Investment Analysis dashboard tool in StateNet, Financial Capital Markets page. The tool allows regulators to view investment exposures by individual insurance companies.

Assessment Level: **Low**	**Trend:** Stable



Source: NAIC

Coverage Trends Summary

Most risk indicators in this section continued to increase including policyholder rate increases, non-renewals, residual markets and insurer insolvencies (due to natural catastrophe related causes). Policyholder rate increases saw double digit growth for a national average of 10.4% and in some states increased more than 20% in 2024.

NFIP flood coverage gaps continue to increase. Protections gaps are stable and the number of policies continues to decline.

Metrics for how many policyholders are reliant on residual markets can inform the interpretation of coverage trends in admitted markets. FAIR and Beach plans and Excess & Surplus Lines experienced premium growth of 6% and 32% respectively in 2024. Additionally, the FAIR and Beach plans and Excess & Surplus Lines market share continued to grow as a percentage of the homeowners insurance market.

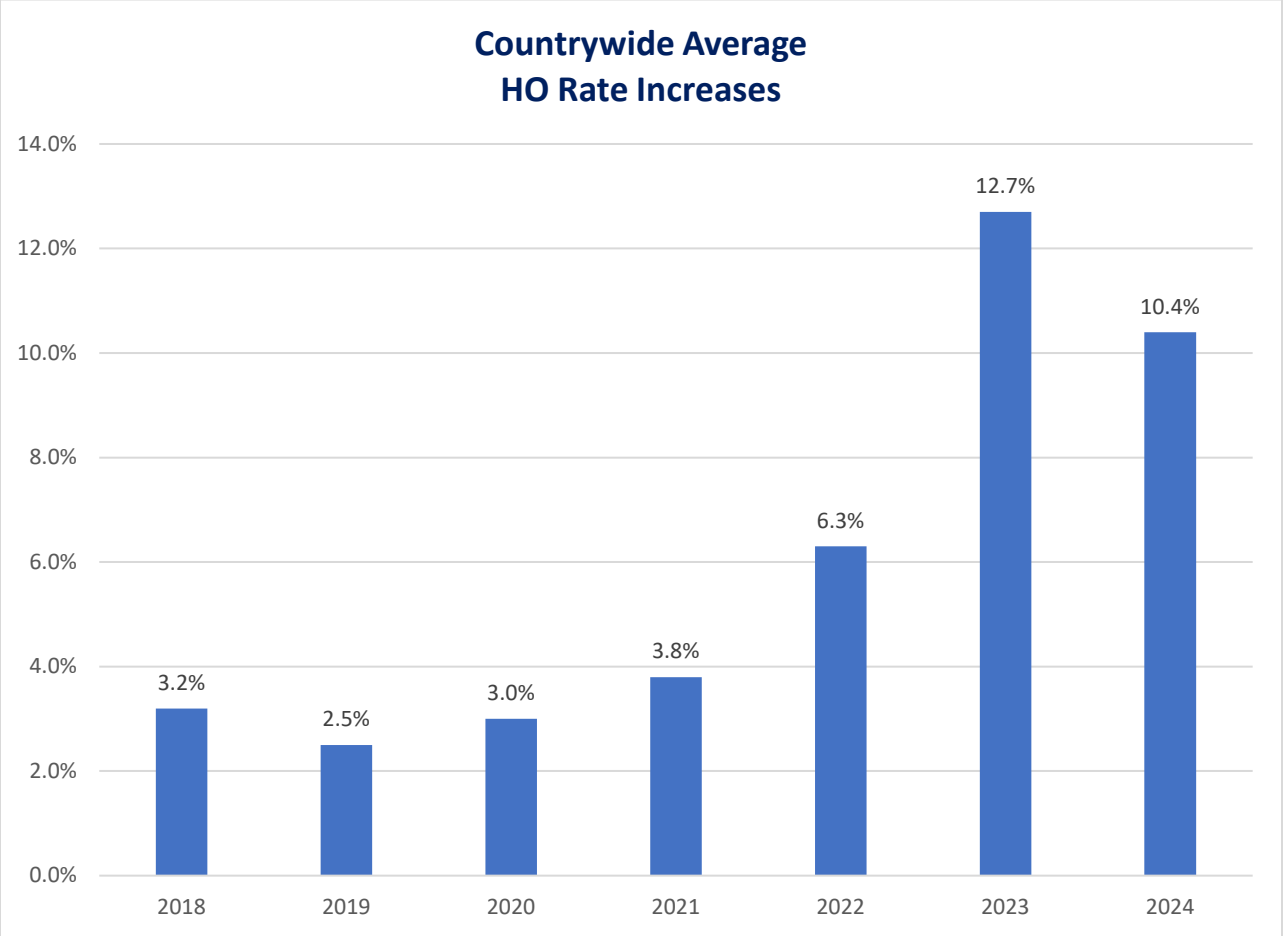
Private Market Trends

Assessment Level: **Moderate-High**	Trend: **Increasing**

Rates/Premiums Summary

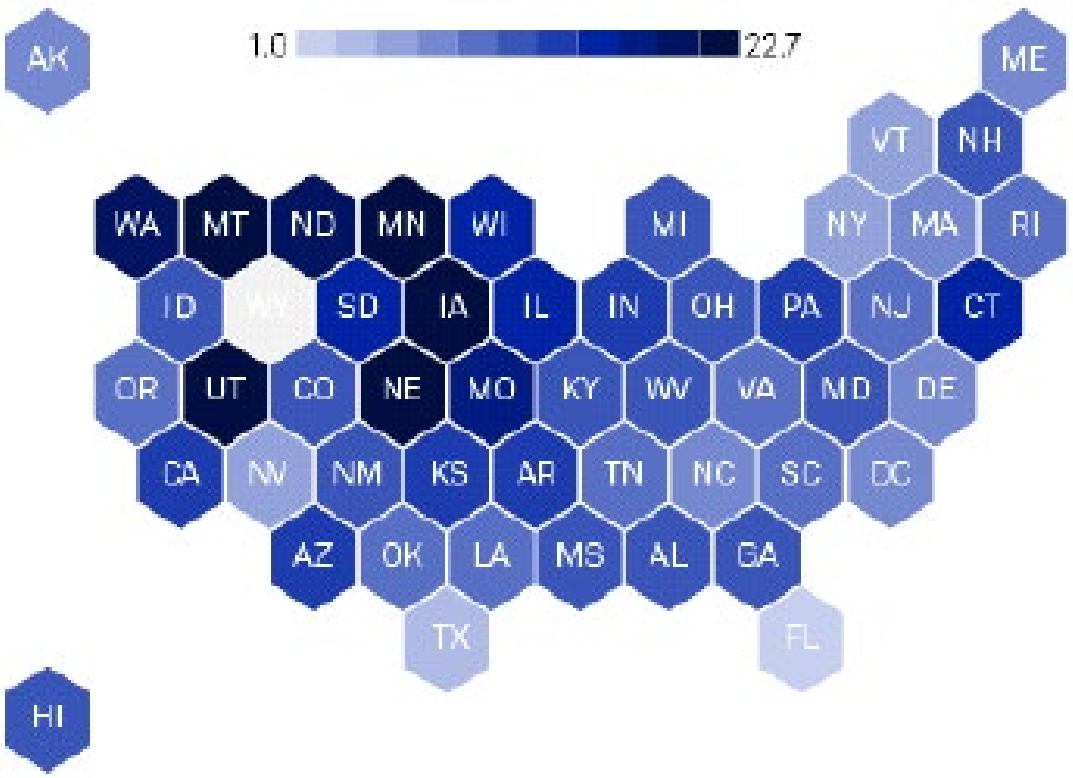
Policyholder rate increases saw double digit growth for a national average of 10.4% in 2024. Additionally, six states had rate increases of more than 20% in 2024. Florida's calculation does not include any changes by Citizens Property Insurance Corp., the state-backed insurer of last resort. Citizens is the largest homeowners underwriter in Florida and is seeking a statewide average increase of 13.5% on its homeowners multiperil policies that would become effective in 2025.

HO Policy Rates



Source: NAIC, S&P

2024 U.S. Homeowners Average Insurance Rate Changes



Source: S&P.

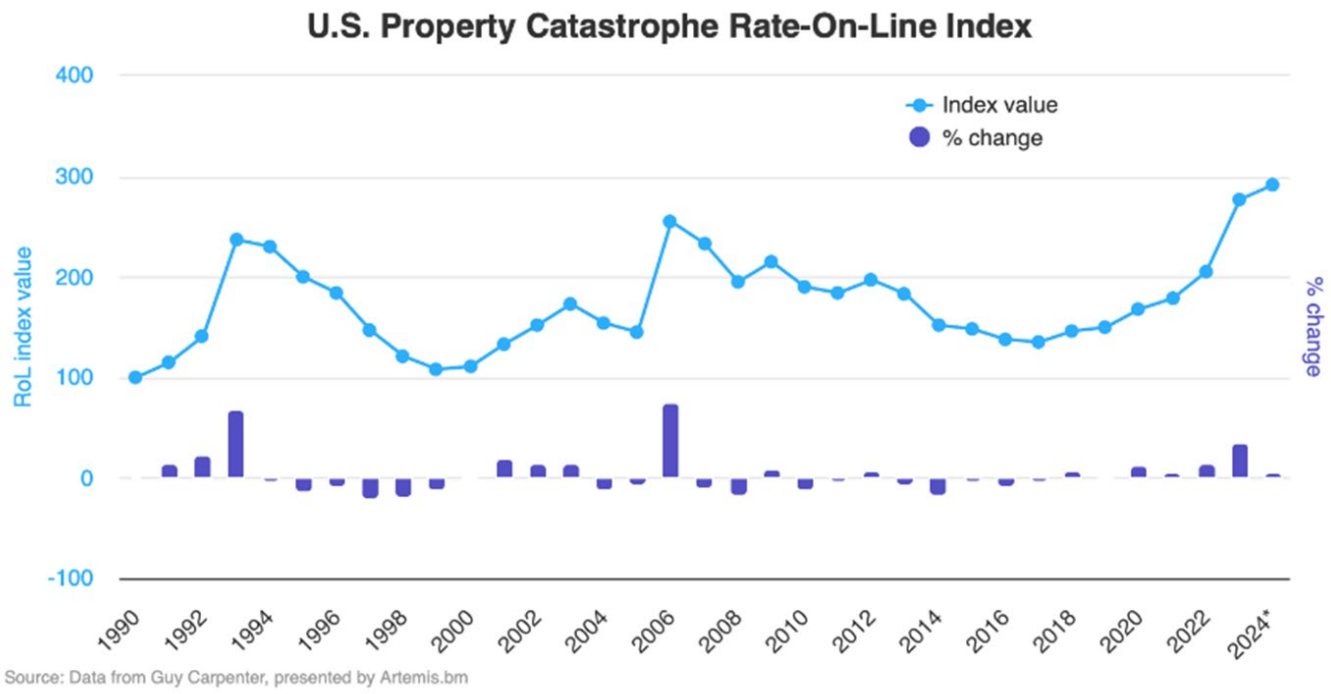
Reinsurance Rates

This Index has fallen by 6.6% as of January 1st 2025, reflecting rate-on-line decreases seen across global property catastrophe reinsurance contracts underwritten by reinsurers at the renewals.

In the prior year, the pace of change slowed considerably in 2024, dropping from the 27.2% gain seen at 1/1 2023 and then 29.3% for full-year 2023, to a gain of only 5.4% at January 1st 2024 and then by the end of the full-year just a gain of 2.3% for 2024.

While rates have now fallen for property catastrophe risks around the globe as the reinsurance market shifts appears to shift to a capacity-heavy softening phase, still rates-on-line remain at historically high levels which implies another profitable year for reinsurers is possible, dependent on loss activity.

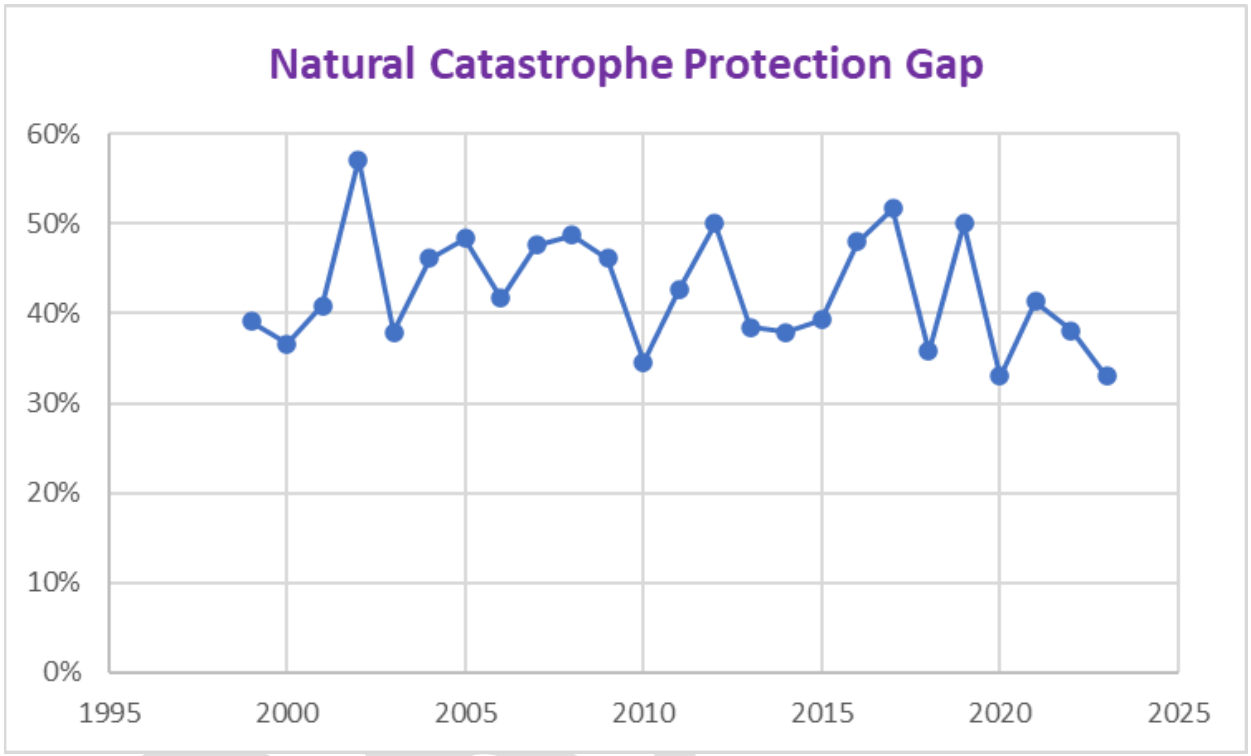
Guy Carpenter noted that strong appetites from traditional reinsurance and alternative capital providers resulted in excess capacity, that served to drive loss-free property catastrophe rates down between 5% and 15% at the January 1st 2025 renewals.



Source: Guy Carpenter via Artemis.

Natural Catastrophe Protection Gap

We define the protection gap for purposes of this measure as the percentage of economic losses that are uninsured using economic and insured loss data from Munich Re.



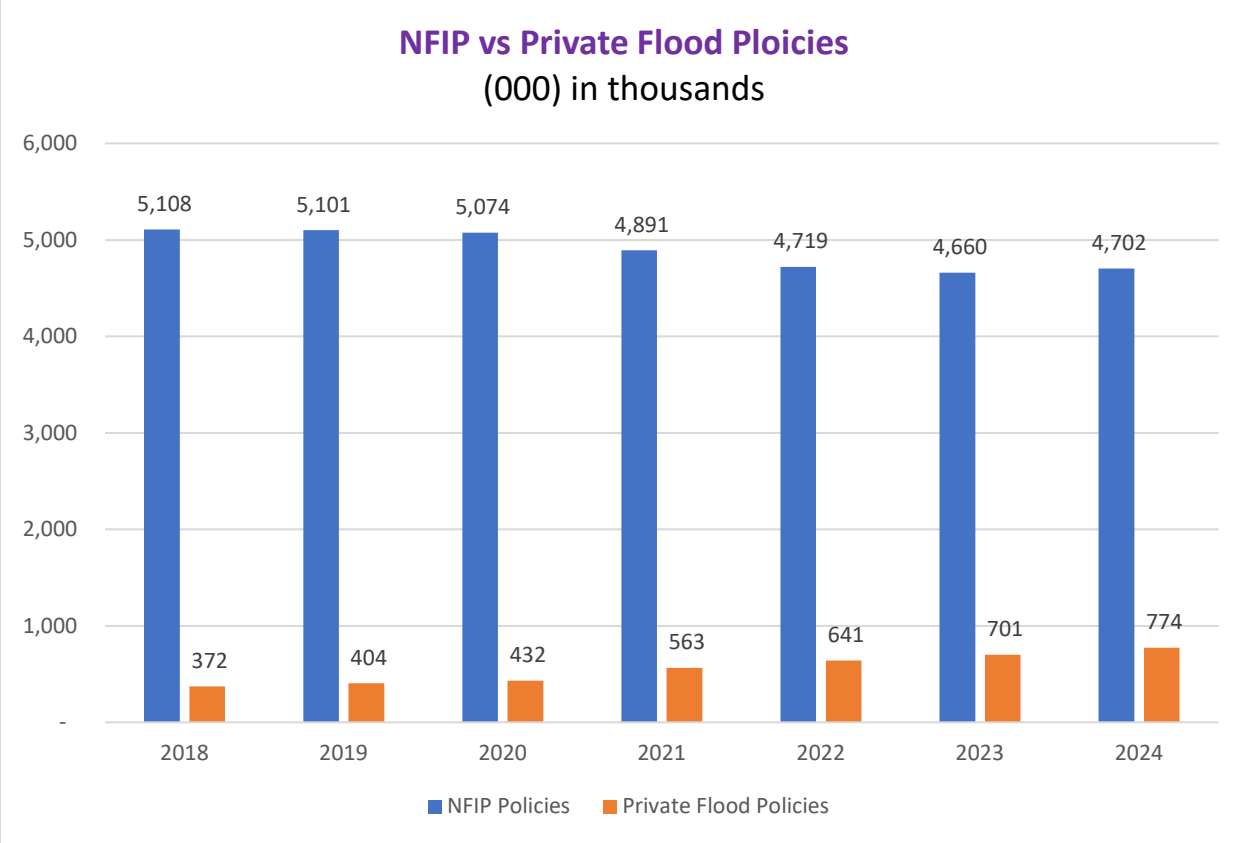
Source: ratio calculated by NAIC using III/Munich Re data

Flood

We track the occurrence of floods as an indicator of natural catastrophe risk, even though the Flood insurance market is predominately covered by the Federal National Flood Insurance Program (NFIP). However, Flood insurance offered by private insurers is increasing and NFIP policies are decreasing as depicted in the graph below. The decline in the number of NFIP policies could have funding consequences if the current premium is not adequate. Also, increasing private sector policies may lead to capacity concerns and other implications.

Assessment Level: **Moderate Low**	Trend: **Stable**

NFIP



Source: NFIP and NAIC

NFIP Coverage Gap

NFIP flood insurance contains two types of underinsured dynamics. NFIP residential building coverage is limited to $250,000. Therefore, home value replacement costs that exceed $250K is not covered and is what we call for purposes of this report a coverage gap. Additionally, there is the protection gap, as we defined above for HO, which is the percentage of economic losses that are uninsured.

The NFIP flood coverage gap continues to increase. Protections gaps are stable although they remain at elevated levels. A protection gap of 53% in 2023 indicates more than half of flood damaged homes did not have flood insurance coverage. These two risk indicators drove the Moderate-Low risk assessment.

	2023	2022	2021
Flood (TIV/limit)	$1.9/$1.2T	$2T/$1.3T	$1.8T/$1.3T
Flood Coverage Gap	39%	34%	27%

TIV=Total Insured Value

NFIP Protection Gap

	2023	2022	2021
Flood Economic/Insured Loss	$9.2/4.3B	$2.8/1.2	$7.5/$2.4B
Flood Protection Gap	53%	58%	68%

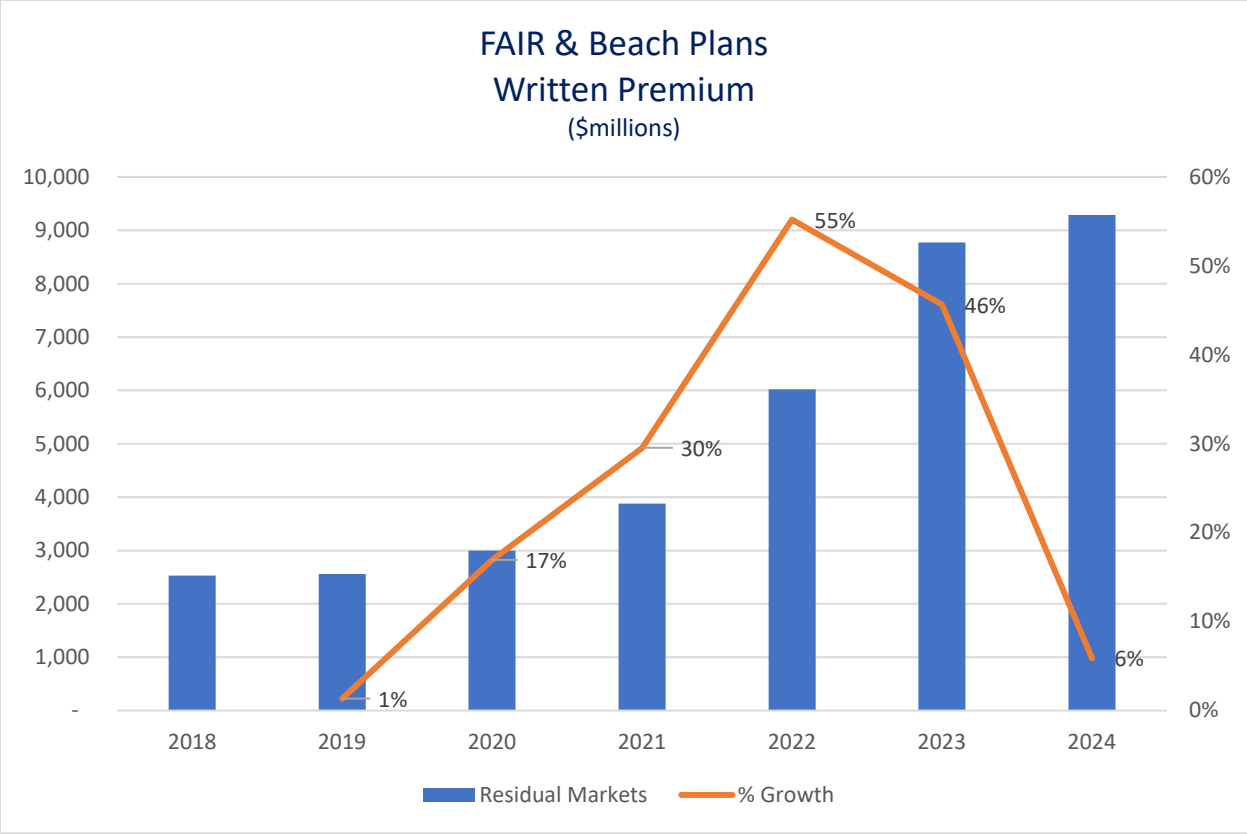
Source: NFIP and NAIC staff calculations

Residual Markets Summary

FAIR and Beach plans and Excess and Surplus Lines experienced premium growth of 6% and 31% respectively in 2024. The FAIR and Beach plan growth slowed but remains at high levels. The Excess and Surplus Lines market share continued to grow, although at slower pace. The elevated levels of DPW and significant growth drove the Moderate-High assessment.

Assessment Level: **Moderate-High**	Trend: **Significant Increase**

FAIR and Beach Plans

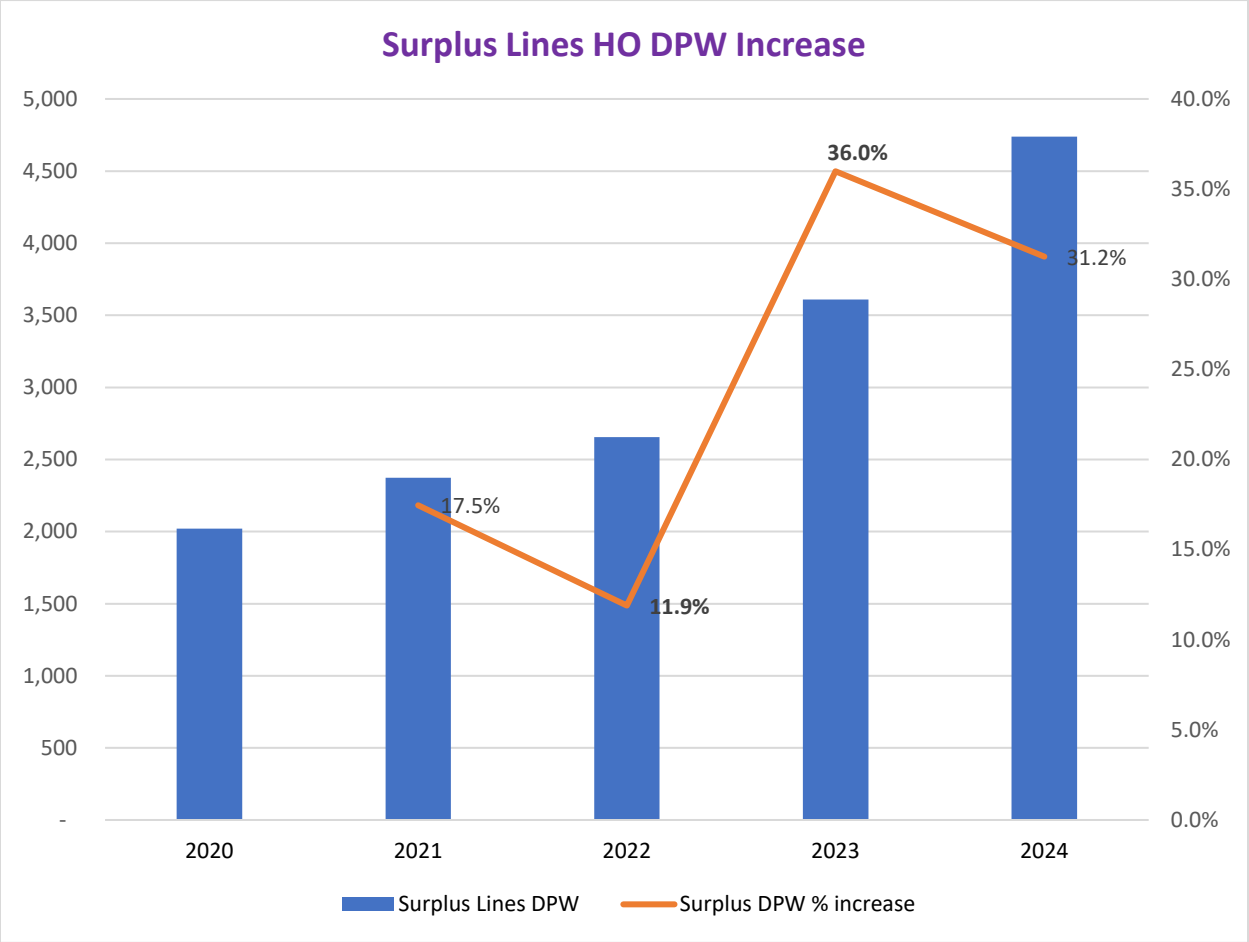


Source: PIPSO

Presented above is an aggregate summary of all FAIR and Beach plans' written premium. For more details by state please see Appendix B. For example, The PROPERTY INSURANCE PLANS COMPILATION OF EXPENSES AND ASSOCIATED RATIOS Report contains data on # of policies issued, premium written, loss and loss adjustment expenses for each state that has a plan. The Compendium report contains data on policy types, limits, rate structure and commission policy.

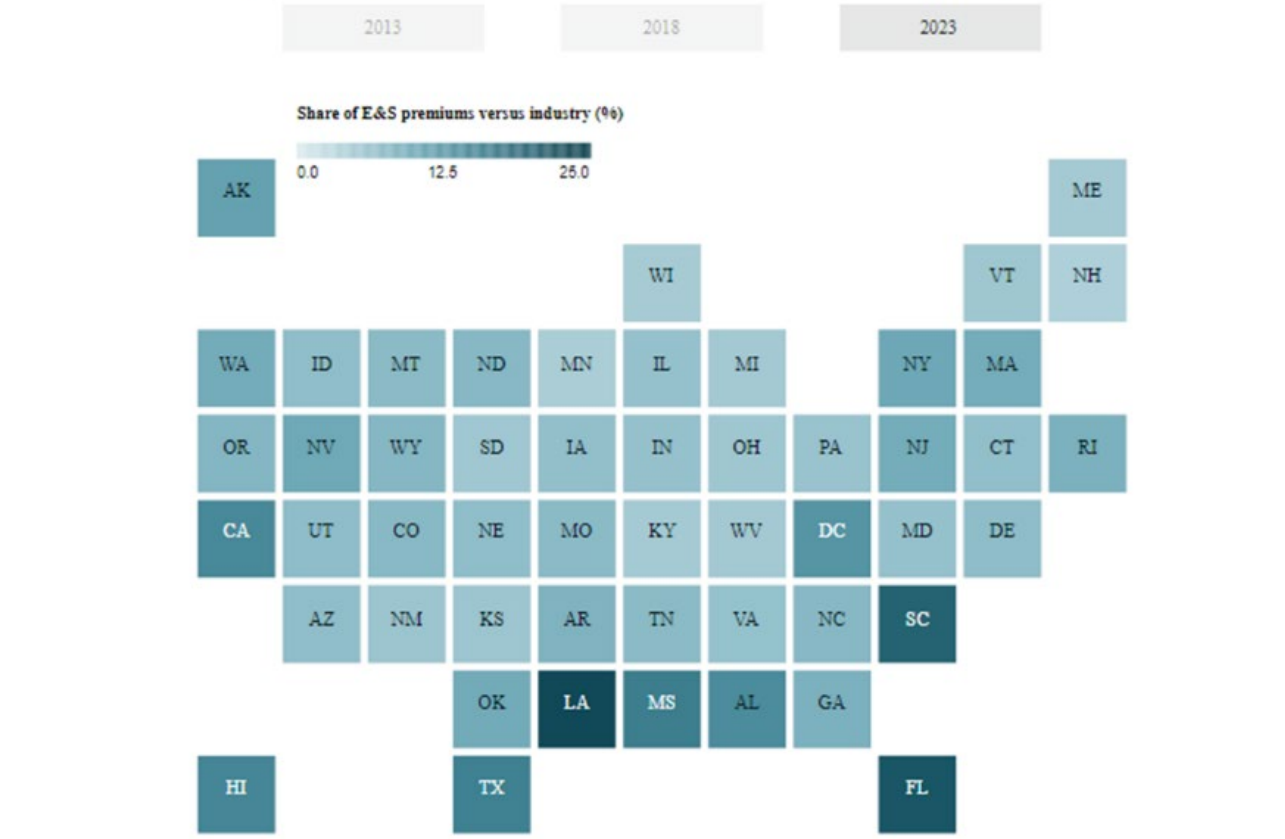
Excess and Surplus Lines

The chart below shows Excess and Surplus Lines, Homeowners insurance line of business, DPW Growth.



Source: NAIC

Share of E&S property premiums compared to state totals (%)

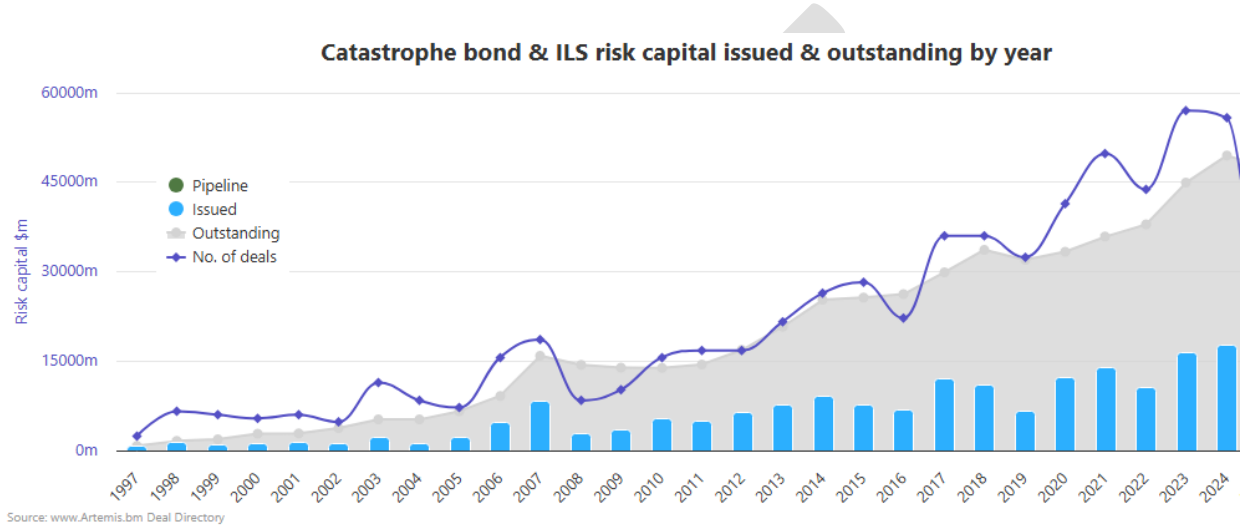


Date compiled April 20, 2024.
E&S = excess and surplus; property = the combination of fire, allied lines, homeowners and nonliability portion of the commercial multiperil business lines.
Entities are deemed excess and surplus writers if it has an active status of not licensed, eligible surplus lines or domestic surplus lines insurer within Schedule T - Exhibit of Premiums Written. Industry data excludes excess and surplus premiums written through Lloyd's of London.
Source: S&P Global Market Intelligence.

The chart above shows the E&S market share of premium totals by state.
Source: NAIC, S&P

ILS and Catastrophe Bonds

The number of Insurance Linked Notes and Catastrophe bonds issued and outstanding continues to rise which may be indicative of increased catastrophe risk and the risk being transferred outside the insurance industry.



Source: Artemis

Mitigation

This report is primarily an assessment of natural catastrophe risks. However, we believe that some mention of the key mitigation initiatives taken by states to reduce the impact of natural catastrophes is appropriate. This section describes some of the key initiatives taken by the NAIC and its member states.

In addition to the existing modeled losses and capital charge for Earthquake and Hurricane, in 2024 state insurance regulators require insurers to report their modeled losses for severe convective storms and wildfire for informational purposes only in the RCAT section. Also new in 2024 is the requirement for insurers to conduct scenario analysis and report the 2040 and 2050 Climate Conditioned modeled losses for hurricane and wildfire perils.

Many states have implemented mitigation programs in the form of fortified homes, strengthening rooves and grant programs to implement such home resilience modifications. Many states have numerous programs both within and outside of a state's insurance department. The programs are continuously evolving and it is a challenge to capture all of them. However, below are a few examples of wind mitigation programs:

States with established wind mitigation grant programs located within a department of insurance

State	***Name of program***	***Program website address***
Alabama	Strengthen Alabama Homes	https://www.strengthenalabamahomes.com/
Louisiana	Louisiana Fortify Homes	https://www.ldi.la.gov/fortifyhomes
Oklahoma	Strengthen Oklahoma Homes	www.strengthenoklahomahomes.com
South Carolina	South Carolina Safe Homes	www.doi.sc.gov/605/SC-Safe-Home/

States with authority to establish an operational wind mitigation grant program within the department of insurance

State	***Name of program***
Kentucky	Strengthen Kentucky Homes
Minnesota	Strengthen Minnesota Homes
Mississippi	Strengthen Mississippi Homes

States with wind mitigation grant programs not operated by a department of insurance

State	***Name of Program***	***Program website address***
Florida	My Safe Florida Home	http://www.mysafeflhome.co
North Carolina	NCIUA Strengthen Your Roof	http://www.strengthenyourroof.co

For more detailed state mitigation information please follow the links below:
Resilience-policy-playbook-addendum

Resilience-policy-resource-guide

The NAIC also has a Catastrophe Modeling Center of Excellence (COE) within the (CIPR), maintaining a neutral perspective to build insights from data in a non-partisan manner. The COE provides regulators with technical training and expertise regarding catastrophe models and information regarding their use within the insurance industry. The COE also conducts research utilizing outputs from catastrophe models to assess the risk of loss from natural hazards. Risk assessment is a foundational tool to identify potential economic and insurance market disruption which can be applied to support policy and legislative action to reduce the risk.

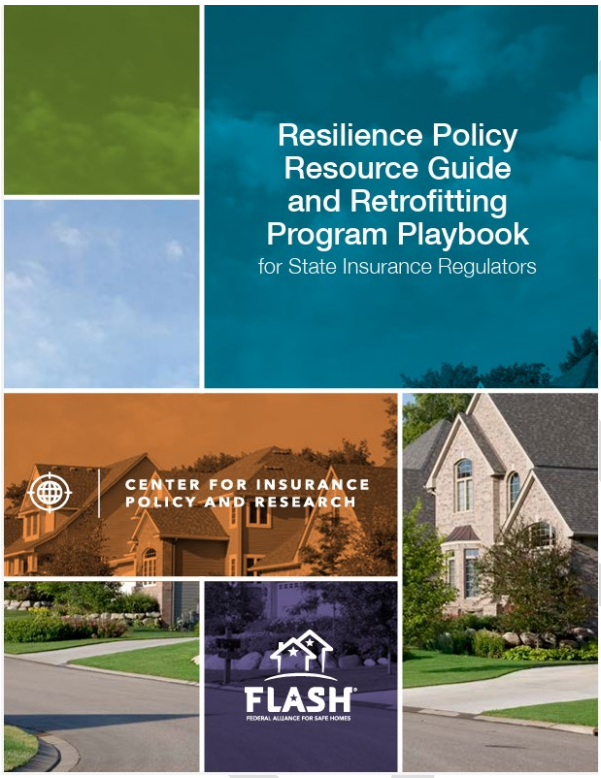
The Resilience HUB within the COE continues to work with States assisting them in the legislative and rule making process, designing, implementing and launching risk transfer programs such as grant programs to retrofit homes to minimize loss due to hurricanes, severe convective storms, hail, tornados and wildfire. For wind related perils, programs like these adopt a retrofitting standard to achieve a level of resilience such as the FORTIFIED™ Standard developed by the Insurance Institute for Business and Home Safety (IBHS). The FORTIFIED™ Standard, based on scientific research, approaches retrofitting using a systems approach, meaning the components that go into building a home are reliant upon each other. This approach ties the components of a structure together, creating a more robust structure and creates a sealed structure from water, wind intrusion and damage from hail. Additionally, departments of insurance are incentivizing consumers to retrofit their home by offering insurance premium discounts on homeowner's policies covering homes that have achieved standards adopted by program.

For states that are addressing mitigation from the destructive force of wildfire, states consider adoption of the IBHS Wildfire Prepared Home. This standard adopts elements of home protection such as creating a defensible space around a structure void of fuels for fire such as combustible shrubbery, wood fences connected to the structure, and the use of protective measures against embers that spread fire such as roofs and ventilation grates. These measures help prevent ember intrusion into a structure.

Departments of Insurance, through the Resilience HUB, work to adopt legislation or exercise authority of insurance commissioners to create additional incentives for consumers to retrofit their homes against loss. State insurance Commissioners are creating incentives to protect consumers as an alternative to retrofitting a home. State regulators across the country are adopting homeowner's policy FORTIFIED™ Roof endorsement to provide for the additional cost to upgrade a roof to the FORTIFIED™ Standard in the event of a roof replacement claim. In conjunction with consumer's using catastrophe savings accounts or other financial options to set funds aside for insurance deductibles or additional mitigation, create a level of resiliency for the consumer that will have lasting effects on the availability and affordability of insurance.

The CAT COE Resilience Hub is engaged with several partners in this space where collaboration is key to the success of establishing viable mitigation programs. The NAIC has a formal memorandum of understanding (MOU) with IBHS. In addition to collaborating on the technical aspects of mitigation programs, the partnership also provides opportunities to train and physically demonstrate to regulators solutions that are being sought after through science. The CAT COE and Resilience HUB in partnership with IBHS hosts trips to the IBHS Research Facility in Richburg, South Carolina, where regulators get insight into the FORTIFIED™ Program and current research that will have an impact on the built environment. Witnessing tests first-hand such as burn demonstrations, hail and wind tests demonstrate the effectiveness and complexity of the research being conducted as well as seeing how solutions are derived from product or building technique improvement.

The CAT COE and Resilience HUB have developed tools that are utilized by regulators regarding mitigation grant programs. Tools to assist regulators with planning and operation of mitigation programs are available through the CAT COE to departments of insurance. An example of one tool available to regulators is a collection of data and maps that help regulators develop an effective distribution strategy of where resources can be deployed geographically to realize the highest rate for potential return by reducing loss with the intent of reducing insurance premiums to consumers. The CAT COE developed a methodology, analysis and reporting format to assist regulators in determining the value of mitigation discounts applied to insurance premiums. This report is also useful in supporting legislative needs to justify the incentive, helping make insurance more affordable for consumers. Additionally, regulators have access to model legislation to assist commissioners developing regulatory authority for their program. Also, published research papers and findings for mitigation are also available to regulators through the CAT COE.



The CAT COE and Resilience HUB in collaboration with IBHS, Smart Home America, and the Federal Alliance of Safe Homes (FLASH), developed the Resilience Policy Resource Guide and Retrofitting Program Playbook (Playbook). Although the Resilience HUB uses and engagement team to work directly with states, providing planning and detailed guidance through the development of a mitigation grant program, this playbook is available to regulators and is designed to provide an overview of mitigation programs across the country. It gives a general understanding of how states approach the development of programs. The playbook highlights established programs, featuring specifics for those programs such as grant amounts and incentives offered for mitigation.

Appendix A: Risk Assessment Scale

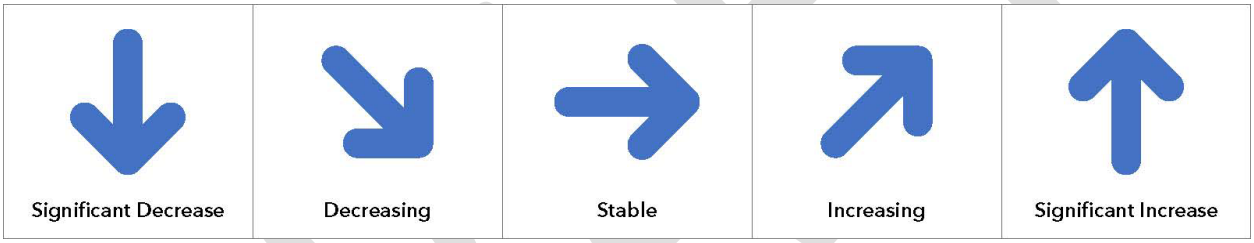
Risk Assessment Scale

Assessment levels are conducted on a four-tier scale consisting of High, Moderate-High, Moderate-Low, and Low. Assessments are based on current and historical risk indicators and expert judgment.

Low	Moderate-Low	Moderate-High	High

Trend Scale

The trend is a historical trend and is indicative of the level of risk. Trend levels are documented on a five-tier scale consisting of Significant Increase, Increasing, Static, Decreasing, or Significant Decrease. Trends are based on the changes in risk indicators and expert judgment.



Appendix B: Fair and Beach Plan PIPSO Data

For more details on Fair and Beach plans by state please follow the links below. For example, The PROPERTY INSURANCE PLANS COMPILATION OF EXPENSES AND ASSOCIATED RATIOS Report contains data on # of policies issued, premium written, loss and loss adjustment expenses for each state that has a plan. The Compendium report contains data on policy types, limits, rate structure and commission policy.

Note these links are on the NAIC's regulator only section of the NAIC's website. Otherwise, these reports are available by subscription.

Compendium of Property Insurance Plans

Compilation of Expenses & Ratios

Directory Property Insurance Plans

Market Penetration Reports

PIPSO Reports

Governing Committee Rosters

4. Discuss Disaster Preparedness Guide Summary

Attachment Four

–Commissioner Ricardo Lara (CA)

NAIC Disaster Preparedness Guide

December 2025

Disaster Preparedness and Response

Gather Data

- Insurance gaps.
- Company exposures.
- Contact information.

"Blue Sky" Communications

- Resilience information to consumers.
- Advocate for pre-disaster mitigation funding.

Know Your Support Structure

- Review the NAIC Disaster Response Program.
- Regularly communicate insurance information with local and state agencies.

Create "GO" Materials

- Packets for consumers.
- Pre-draft bulletins.

Rapid Assessment and Response

- Identify financially sensitive companies.
- Issue bulletins to insurers and notify local officials.
- Announce workshops or insurace villages to directly assist consumers.
- Activate a communications strategy to pre-empt misinformation.
- Contact major insurers in impacted areas.

Introduction

State insurance regulators play a crucial role in the initial response to a disaster and the long road to recovery. When policyholders face immediate questions, it is insurance regulators who must be prepared to engage with information, not only with insurers and policyholders, but with local government officials, the media, and state and federal partners.

This Disaster Preparedness Guide acknowledges that successful disaster response by state insurance regulators must be rooted in preparations long before the disaster strikes.

Disasters can occur anywhere. Even in states that have had recent disasters, each new event can bring new or compounding impacts. Being proactive today puts regulators in a position to:

- Pre-empt misinformation that moves rapidly through communities immediately after disasters.
- Hold insurance companies accountable to clear communication with consumers, rapid response to early payments for losses, and long-term engagement with the affected areas.
- Communicate and collaborate with government agency partners.
- Collect important information that can be used to track the progress of recovery.
- Provide crucial information to the public on how to rebuild with insurability as a priority.

Hawaii's Division of Insurance and North Carolina's Department of Insurance

Hawaii

- Wind-driven fires in Lahaina, Maui, 2023.
- As of two years post-fire, over 10,000 claims filed and over $3.4 billion in losses (Wildfire and Wind Claims Data Call).

North Carolina

- Tropical Storm Helene in 2024.
- 99% of homeowners did not have flood insurance (Helene Retrospective).
- Identify financially sensitive companies.
- Issue bulletins to insurers and notify local officials.
- Announce workshops or insurance villages to directly assist consumers.
- Activate communications strategy to pre-empt misinformation.
- Contact major insurers in impacted areas.

Pre-Disaster

By preparing a disaster response plan during calm periods ("blue skies"), state departments of insurance (DOIs) can reduce the pressure and confusion that often arise when a catastrophe strikes unexpectedly. Proactive planning ensures that the department is prepared to respond quickly and effectively, leveraging proven strategies and lessons learned from others.

Additionally, prior to any disaster, preparedness should be at the forefront of consumers' minds. A DOI can help consumers prepare for a disaster by providing them with helpful information. The NAIC offers resources for pre-disaster consumer education, including its Insurance Disaster Response Plan, a fillable PDF that provides information helpful to states.

Partnerships with private volunteer organizations can also be useful in coordinating a response following a disaster. A key contact, the Voluntary Organizations Active in Disaster (VOAD), is dedicated to serving communities throughout the disaster cycle.

> The NAIC maintains a collection of Consumer Insights for various perils, which states can use to educate consumers prior to a disaster.

Insurance Contact Information

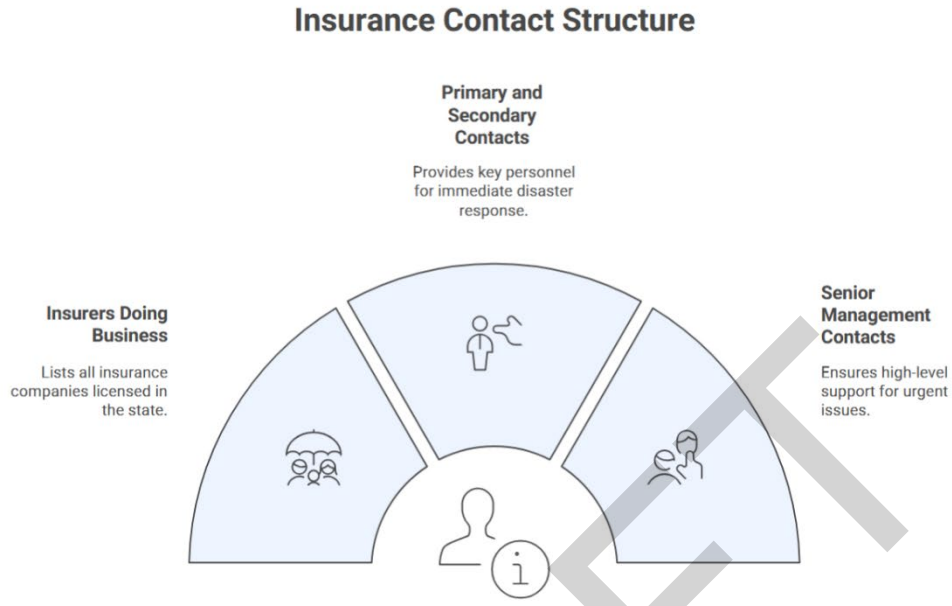
It is important for states to collect insurers' contact information and test communication methods in preparation for future disaster response and recovery efforts. States can maintain contact information obtained through an annual request in State Based Systems (SBS), another database, data calls, trade associations, or a Microsoft Outlook contact list. Some DOIs also utilize the Uniform Certificate of Authority Application (UCAA) Change of Mailing Address/Contact Notification Form, (NAIC Form 14) adding information for the Catastrophe/Disaster Coordination Contact .

> Appendix 3 of the NAIC Insurance Disaster Response Plan provides a fillable document that can be used to record insurance company contacts for insurers licensed to do business in the state.

A contact person for the insurer must be available so the DOI can make contact in the event of a catastrophe or disaster. This contact information should include:

- Non-admitted surplus lines insurers.
- Residual market insurers or Fair Access to Insurance Requirements (FAIR) Plans.
- Both high-level contacts for planning workshops in the immediate aftermath of a disaster and staff-level contacts who can provide important data for state insurance regulators to prioritize efforts.

These contacts should include individuals who can provide coverage data and loss statistics, by county or region, in a standardized format developed by the DOI. Furthermore, the insurer contact should be knowledgeable about the insurer's internal information systems and sources and authorized to access such systems.



While working at the assistance centers, roughly 62% of the DOIs completing the survey have access to an insurer's dedicated point of contact rather than an insurer's general phone line when fielding in-person questions from consumers at a recovery center. The length of time these dedicated lines are available depends on disaster information.

Exercises to Prepare for Future Disasters

Before disasters occur, it's essential to thoroughly assess risks. By recognizing dangers and weaknesses, DOIs can be better prepared to respond to emergencies, which helps save lives and reduce financial losses.

Engaging in some type of practice exercise in preparation for future disasters is recommended. While each DOI may not conduct a separate tabletop exercise, many of these types of exercises are carried out through a state's emergency management agency on an annual basis and may be available for a DOI to participate in. Check with the state emergency management agency in your state to see what they have available.

Mitigation Programs and Education

Some states operate mitigation programs that enable consumers and communities to take part in reducing disaster risk. Although these programs are generally not housed within the DOI, they are typically sponsored by the state.

For states that do not currently have a mitigation program but are interested in developing one, the NAIC's catastrophe risk resiliency advisor can work with the DOI to identify appropriate program models and provide strategies for addressing funding needs. For assistance, please contact Brian Powell at bpowell@naic.org. Additionally, NAIC resources can be found at Natural Catastrophe Risk Mitigation and Resiliency Resources and the NAIC Resiliency Map.

Partnering Early with Emergency Management and VOAD

Challenges created by disasters highlight the need to establish partnerships before a catastrophic event occurs. Because disasters affect entire communities, a collaborative approach is essential. Building strong partnerships across public safety functions can help reduce the fear, stress, and uncertainty that often arise during a crisis.

Effective planning also requires integrating emergency management agencies, as shared approaches and coordinated partnerships significantly improve disaster response.

After a catastrophic event, local volunteers are often the first to respond, helping lessen the impact. One key volunteer resource a DOI can engage with during blue-sky periods is the Volunteer Organizations Active in Disaster (VOAD). VOAD is a community-based network of volunteers that supports coordinated disaster preparedness and response efforts.

Prepare "GO" Packets

According to a state survey completed by 29 states, approximately 70% of the states did not have "GO" packets prepared. Preparing informational packets ahead of a disaster to distribute to consumers makes it easier for DOI staff to assist survivors following a disaster and serve as a trusted source of information. Items that might be included in a DOI's GO packet include:

- A post-disaster claims guide.
- A homeowners insurance guide.
- A trifold that explains how the consumer affairs division of a DOI helps consumers.
- A consumer affairs hotline business card.
- A DOI-branded notepad and pen for easy notetaking.

Recommendation: Ensure timely communication to prevent issues from escalating.

Recommendation: Create and maintain the DOIs "GO" procedures

On an outreach table, the DOI can include other brochures that are relevant to their individual situations, including:

- Auto and renters insurance guides.
- National Flood Insurance Program (NFIP) information.
- Consumer Information about Earthquake Insurance and Preparation.
- Draft bulletins prior to disasters occurring.
- Practice utilizing insurance market data to identify key insurance companies to contact in the immediate aftermath (for example, the property/casualty [P/C] insurance market share in your state)).
- Check consistency of language and timelines with neighboring states.
- Establish procedures for working with other state agencies.

Key Example: Recently, the Missouri Department of Commerce and Insurance released the Emergency Go-Kit Passport, a publication that guides consumers in creating a personal emergency packet. It outlines what to include—such as a family emergency plan, pharmacy and physician information, prescription details, and insurance policy documents—and provides tips for responding to floods, storms, and other emergencies.

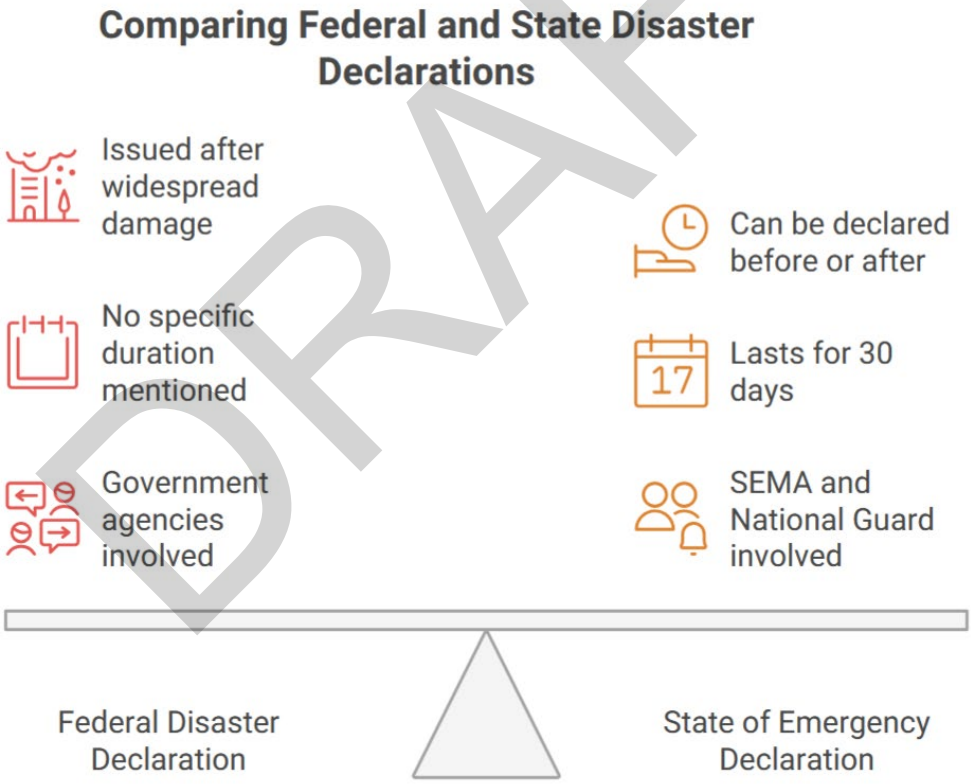
Post-Disaster

When a disaster strikes a community and challenges arise, communities expect federal aid to be available. This is made possible by the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). The Stafford Act allows the president to declare a major disaster or emergency, which opens a wide range of federal support, resources, and financial help. If a catastrophic event causes widespread damage, the president issues a federal disaster declaration.

The objective of the Stafford Act is to help states and local areas develop disaster preparedness plans, improve coordination between governments, encourage the use of insurance, and establish federal programs to assist communities and individuals in recovering from significant losses.

Federal assistance under the Stafford Act is designed to be supplementary, not primary. The entire declaration process is initiated only when a governor of a state or the chief executive of a federally recognized Indian tribal government determines that the severity and magnitude of an incident have overwhelmed their jurisdiction's capabilities.

When a state's governor declares a disaster, it remains in effect for 30 days, allowing the state's emergency management agency and the National Guard to work directly with local governments.



Recommendation: Understand the DOI's state rapid response laws and apply lessons learned to new or revised statutes.

The chart below is included in the NAIC's Insurance Disaster Response Plan, which provides the DOI with an idea of a disaster's severity and offers information about response levels and definitions. These response levels and definitions are valuable when planning how a DOI responds to a disaster, based on its severity.

Response Levels and Definitions

	Disaster Level 1	Disaster Level 2	Disaster Level 3	Disaster Level 4
Typical Damage	Exterior Damage to Private Property	Exterior Damage, Possibly Some Interior Damage, and Possibly Some Structural Damage to Private and Commercial Property. Infrastructure Damage to Telephone and Power Lines.	Exterior Damage, Interior Damage, and Structural Damage to Private and Commercial Property. Infrastructure Damage to Telephone and Power Lines. Temporary Interruption of Normal Public Services.	Significant to Massive Exterior, Interior and Structural Damage to Private and Commercial Property. Infrastructure Damage to Telephone and Power Lines and Possibly Cell Towers. Communications, Public Services Lost for Extended Time.
Insured Losses	Less than $100 Million	Between $100 Million and $1 Billion	Between $1 Billion and $10 Billion	Greater than $10 Billion
Types of Events	Rural Tornadoes Rural Hailstorms Rural Windstorms Local Flash Floods	Town-leveling tornadoes Suburban Hail and/or windstorms Area-wide ice storms Area-wide flash floods Rural & Residential Forest/Wildfires	Region-wide Region-wide ice storms Urban Tornadoes Major outbreak multiple tornadoes Urban Floods Urban/Suburban Fires Significant Blizzards Moderate earthquakes	Significant Earthquakes A major New Madrid EQ Significant record-breaking floods Major influenza outbreak
Geographical Extent	Localized	Localized to disbursed	Localized to widespread	Disbursed to widespread
Affected Population	Small	Small to Moderate	Small to Large	Moderate to Large
Examples	Hoisington, Kansas F4 Tornado (April 21, 2001) $43 Billion in Damages	La Plata, Maryland F4 Tornado (April 28, 2002) $100M in Damage	Nashville Flood (May 1, 2010) $1.5 Billion in Damages	Great Flood of 1993 (Missouri & Mississippi Rivers) $15–20 Billion in Damages
		Haysville/Wichita, Kansas F4 Tornado (May 3, 1999) $150 Million in Damage	Oakland/Berkeley Firestorm (October 19, 1991) $1.54 Billion in Damages	Northridge Earthquake (January 17, 1994) (Mag. 6.7 Mom. Mag.) $15 Billion in Damages
		Greensburg, Kansas EF5 Tornado (May 4, 2007) $153 million in Damage (Approx. 2,000 claims)	Tornado Outbreak in KC, Okla. City (May 2005) F3s & F4s $3.2 Billion	FEMA Estimate for a Mag. 7.7 Earthquake in Missouri: $30+ Billion in Damages

Managing Misinformation and Disinformation During a Disaster

In the wake of a catastrophe, misinformation and disinformation can spread rapidly, confusing and eroding the community's trust. It can also disrupt rescue and recovery efforts, jeopardizing lives.[1]

DOIs should help consumers distinguish between misinformation (unintended errors) and disinformation (deliberately false information), as well as how to rely on confirmed information from official sources.

The use of social media enables the rapid spread of misinformation and disinformation. When consumers or the media spread misinformation, some of the reasons include:

- The person reading the information does not take time to pause and determine the accuracy of content
- Misinformation can be catapulted by quick clicks
- The information itself sparks an emotional response in the person reading the misinformation

Key Example: In the days following the January 2025 Los Angeles–area wildfires, misinformation spread rapidly about insurers canceling policies after consumers lost their homes. Without prompt correction, this type of misinformation can erode confidence in claims being paid and create conditions where consumers are more susceptible to rushed decisions and fraud.

Misinformation:

The spread of false information can lead to unnecessary panic, fear, and confusion among affected populations. The result of misinformation can divert resources, delay critical actions, and undermine the efforts of first responders. Additionally, rumors and false information can lead people to take unnecessary risks (like ignoring evacuation orders or seeking unreliable sources of help.

Misinformation spreads quickly through social media and other online platforms, making it difficult to control the narrative during a crisis. When using social media as a communications tool, keep some best practices in mind.

A DOI's communications department should monitor social media for problematic rumors and other forms of misinformation and take action to counter them.

When a DOI is sharing information on social media:

- Keep the posts short.
- Cite evidence.
- Use clear language.
- Acknowledge uncertainties.

Ensure that local agencies and elected officials are part of your communication strategy, as they can disseminate information effectively and also serve as a source to communicate instances of misinformation about insurance.

[1] https://health.maryland.gov/preparedness/Pages/Countering-Misinformation-&-Disinformation-During-a-Disaster.aspx

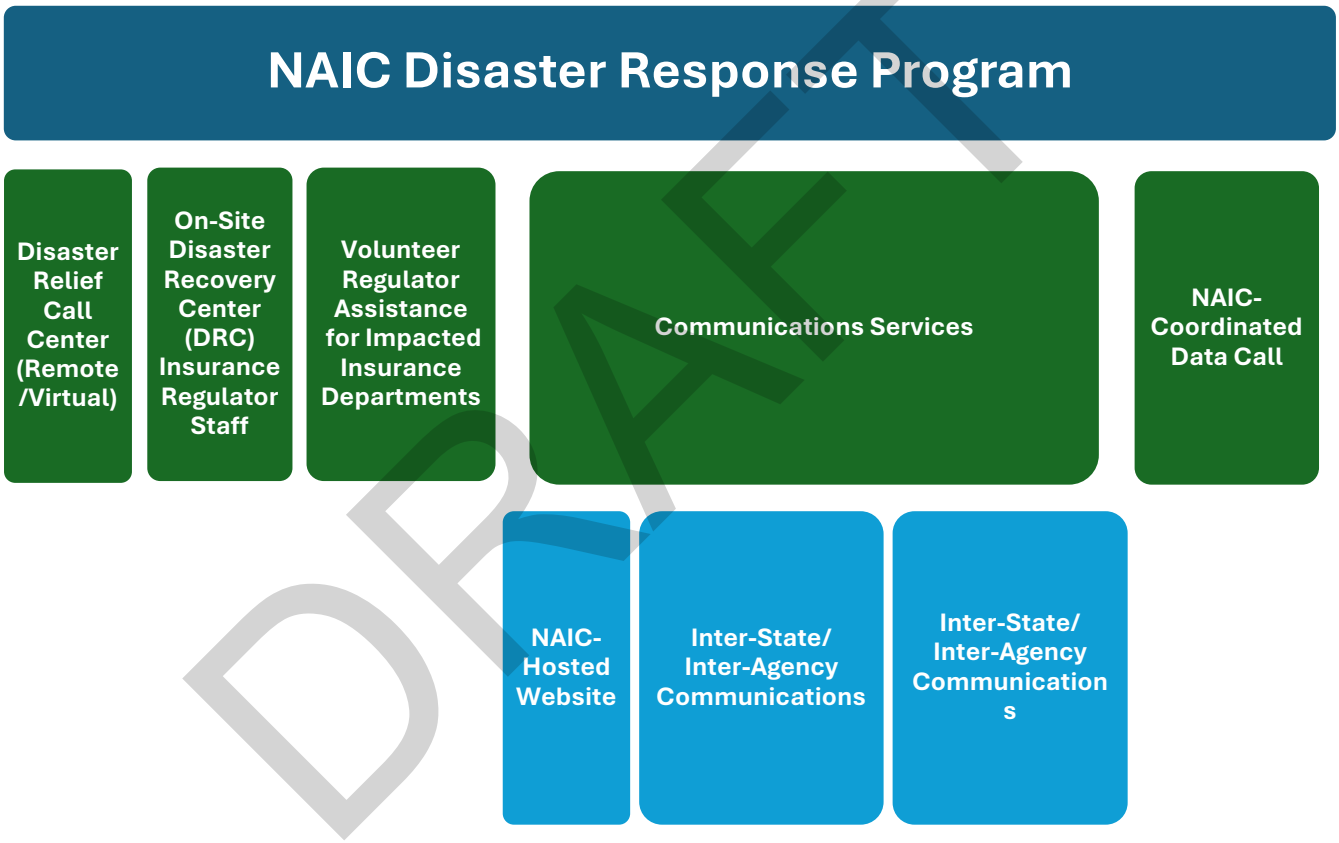
Key Example: The Washington State Office of the Insurance Commissioner created a 16-minute podcast that provides information about disaster preparation, as well as some of the questions volunteers received from policyholders while helping in the recovery of the Lahaina fires.

Am I Ready for a Natural Disaster?

What NAIC services are available to empower state regulators to be rapid responders?

The NAIC Disaster Assistance Program offers a range of services to any NAIC Member's DOI in need of additional support due to a catastrophic event. Every event is different, and the impact will vary by region.

The Disaster Assistance Program is tailored to address a diverse range of situations and needs. The diagram below illustrates the available assistance following a disaster.



Steps a DOI Should Take Prior to Requesting NAIC Support

The level of a disaster's impact may determine the support a DOI needs from the NAIC. Here is what a DOI should determine before contacting the NAIC:

Determining NAIC Support Needs Based on Disaster Impact

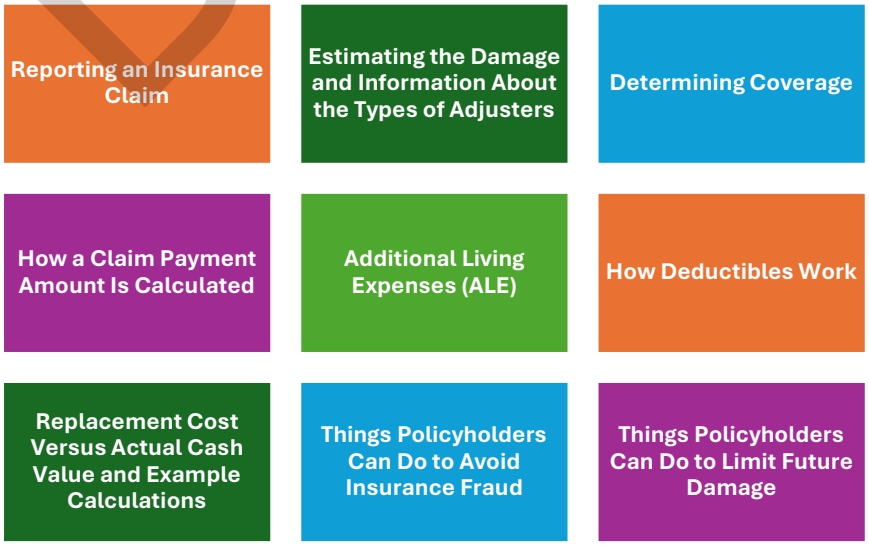
- Identify the DOI's critical staff and who will be coordinating with the NAIC.
- Assess the functionality of the DOI's systems and facilities after the event, i.e., phone, internet, other communications, and office.
- Evaluate access to power and critical infrastructure.
- Assess business impact analysis, i.e., the minimum the DOI needs to function.
- Consider the type of assistance the DOI may need, including call center overflow, on-site regulatory staff support, website, or remote office. The NAIC is also prepared to consider new services to meet the DOI's needs.
- Document how a trusted third party may access the DOI's communications systems, i.e., phone and internet.
- Prepare and provide talking points, frequently asked questions (FAQs), and jurisdiction guidelines (i.e., emergency adjuster licensing rules) that can be shared with call center staff and on-site disaster recovery center (DRC) volunteers.
- Share jurisdiction-issued bulletins and how the NAIC should handle them.

What Should Homeowners Do After a Disaster?

The NAIC Post-Disaster Claims Guide provides information in layman's terms that a consumer can use following a claim.

The guide not only provides textual information but also includes sections that offer details on adjuster types, payment methods, working with an insurance adjuster, handling claim denials, and calculating claim payment amounts based on deductible types. The guide also addresses actual cash value (ACV) and replacement cost value (RCV), providing examples of how both are calculated.

The Post-Disaster Claims Guide addresses the following:



Lessons From Recent State Regulatory Disaster Responses

There is no better place to understand the complex role regulators can play in a modern disaster response than by learning from the lessons of state regulator responses to recent disasters. Two geographically distinct jurisdictions that faced different catastrophes, protection gaps, and communication challenges were chosen to illustrate the immediate actions taken, resources allocated, challenges encountered, recovery outcomes, and lessons learned.

Hawaii Insurance Division Response Following the Lahaina Fire

Date of Event: Aug. 8–9, 2023

Throughout history, urban and suburban fires have typically involved the following key factors: 1) drought; 2) wind, 3) an ignition source often caused by human activity; 4) dense construction using materials that were not fire-resistant; and 5) a high concentration of combustible elements around structures.[2]

Wildfires occurring in built environments can be particularly destructive. The Lahaina Fire occurred in built environments. The fire originated in dry grasslands and spread rapidly into nearby communities, causing the loss of over 1,000 structures.[3]

Following the Lahaina wildfire, the Hawaii Insurance Division (HID) created a web page that included several handouts from its disaster recovery center (DRC). These handouts included:

- Fire claim information.
- Automobile fire and storm claim damage.
- FAQs on fire claims, including translated versions in 10 languages.
- NAIC Post-Disaster Claims Guide.

Does your DOI have information about the various perils on its website and handouts for consumers at DRCs?

If the disaster affected many consumers, authorize the temporary use of nonresident independent adjusters to assist with claims if necessary.

On **Aug. 9**, the Hawaii insurance commissioner authorized the temporary use of non-resident independent adjusters to assist with the increased claims workload resulting from the recent fires in the state. The intention of this action was to allow insurance companies to respond promptly to property owners' needs. However, the declaration does not apply to non-resident public adjusters, who charge fees to policyholders for assessing and evaluating claims.

[2] Insurance Institute for Business & Home Safety. (2023) *Suburban wildfire conflagration white paper* [White paper]. https:/ibhs.org/wp-content/uploads/Suburban_Wildfire_Conflagration_WhitePaper.pdf
[3] Ibid

On **Aug. 16**, the Hawaii insurance commissioner issued a memorandum urging insurers to be mindful of the residents who have lost their homes, businesses, and employment due to the wildfires. The insurance commissioner recommended insurers:

- Avoid cancelling or non-renewing policies due to non-payment during this time of hardship.
- Provide a grace period for premium payments.
- Offer structured payment plans for overdue premiums.
- Waive late fees and penalties.
- Extend deadlines for the completion of property and automobile inspections, as well as medical examinations.
- Continue to assist insured individuals for at least 60 days after the emergency ended, or as long as was reasonably feasible.

Issue a memorandum or bulletin to insurers if necessary.

Draft bulletins or examples that can be used in the event of a disaster happening in the future.

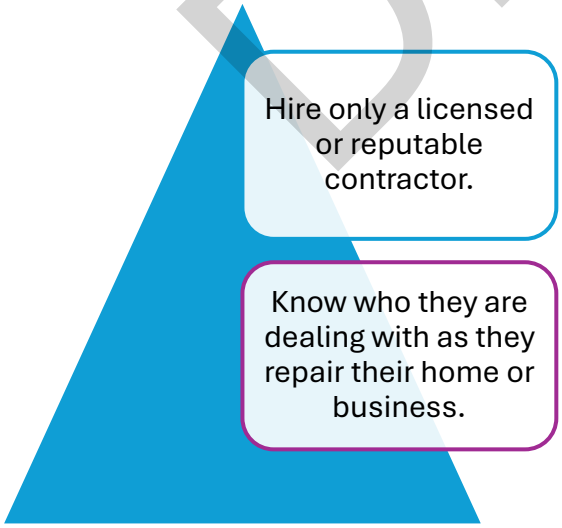
On **Sept. 1**, the HID issued a memorandum requiring insurers to report financial information regarding claims related to wildfire and wind damage (a data call).

This financial insurance information collected from these calls is used to monitor the solvency of domestic insurers. Additionally, data calls are commonly used by state insurance departments to determine the total number of claims and insured losses due to a disaster. The data collected is based on aggregate data for lines of business covered by the insurers.

Because the recovery period for the Lahaina Fire was expected to take a significant amount of time, on **Sept. 14**, the HID issued Memorandum 2023-5A, which encouraged insurers to extend additional living expenses (ALE) to 36 months, subject to policy limits. ALE varies among insurers but is often 12 months from the date of the event.

Policyholders were encouraged to contact their insurance company to determine if it would provide at least 36 months of ALE coverage, as well as to obtain information on any applicable policy limits. The HID also encouraged policyholders to be prudent in budgeting for the use of ALE benefits. If other federal or state resources are available, the division recommended using them before ALE, if possible.

Through a recovery process, consumers should be reminded to:



To learn more about the communications the HID used following the Lahaina Fire, check out Fire Claim Information, Licensed Contractor Information, and Checks on Businesses.

NAIC-Funded Regulator Support for Hawaii's DRC

Volunteers all resided in the Western Zone. The NAIC funds covered travel expenses, including airfare, lodging, and food.

From **Aug. 17, 2023, through Jan. 7, 2024,** the HID sent over 30 staff members to assist at the DRC established by the Federal Emergency Management Agency (FEMA) from Aug. 17 to Sept. 4. Beginning Sept. 5, the NAIC funded 19 regulators from seven different jurisdictions to assist with setting up another DRC onsite in Hawaii. Volunteers consisted of two to four regulators at a time, who traveled for one to two weeks to assist with staffing the DRC.

During this time, the Hawaii insurance commissioner met regularly with the NAIC to assess needs, which were then communicated to the NAIC officers.

Data Call

The HID issued a data call beginning on **Sept.16** through the NAIC. The first report covered the period beginning Aug. 31. The data was updated and collected on the 15th of each month, as well as at the end of every month, through Jan. 15, 2024. Additionally, two more data calls were completed, one on July 10, 2025, and the other on Jan. 12, 2026.

Updates to the reported data call information were posted to the HID website.

Outreach Events

- The HID staffed the DRC at Maui College from **Aug. 17 to Sept. 4** and Lahaina Civic Center from **Sept. 5 to Jan. 7, 2024**.
- The HID created two Insurance and Banking Assistance Center (IBAC) events, **Aug. 26–27 and Sept. 1–2,** in Whalers Village. These events allowed consumers to connect with insurers and provided insureds with assistance to facilitate the claims process. HID staff were available daily to provide in-person guidance and resources at the FEMA DRC.
- HID staff participated in the Federal Resource Fair on **Aug. 26**, where they assisted residents who lost personal documents in the fire, such as insurance policies.
- On **Sept. 5**, HID staff attended a business forum in Kapalua addressing the wildfire's impact on local businesses.
- HID staff attended the Filipino Resource Fair on **Sept. 23** to support those impacted by the Maui fires.

Immediate Response from the Industry

Before a disaster strikes, insurers help people prepare for risks such as flooding, wildfires, and hurricanes. Every part of the country needs protection against the risks it faces.

Following a disaster, insurers play a critical role in emergency response efforts, surging into impacted areas to assist customers and deploy all available resources to process claims. After a disaster, many insurers also participate in "insurance villages," which are established by a state agency, such as the state DOI, allowing insurers to work directly with customers to assist with claim filing.

Insurance is about so much more than writing a check; it's about helping people rebuild their lives following a disaster. An insurer's primary concern following a disaster is to assist its customers in rebuilding their lives and restoring their property. Insurers play a crucial role in emergency response efforts by deploying claims adjusters to areas affected by catastrophic events to expedite the recovery process.

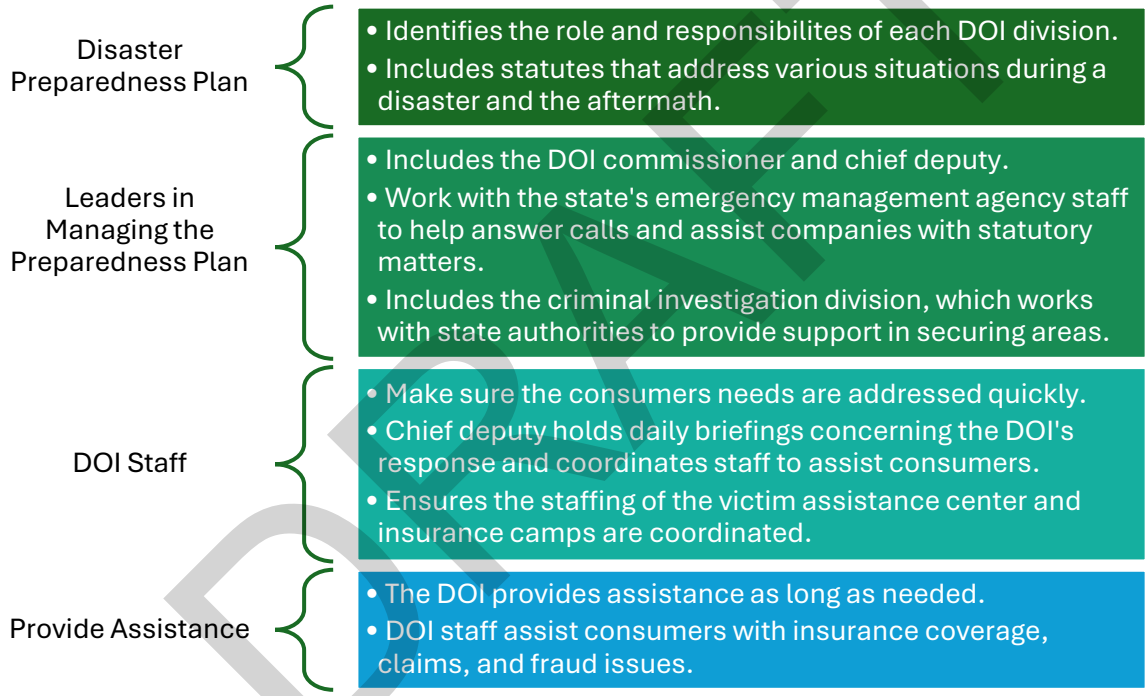
North Carolina Department of Insurance: Hurricane Helene

Date of Event: Sept. 27, 2024

Hurricane Helene devastated much of western North Carolina and significant portions of the surrounding Southeast, including Florida, Georgia, South Carolina, Tennessee, and Virginia. The mountain regions were hit hardest. There, record-breaking rainfall triggered catastrophic flooding, caused more than 2,000 landslides and mudslides, and washed out entire communities' infrastructure, destroying homes, cutting power and communications, and leaving many towns isolated.

In response to Hurricane Helene, the North Carolina DOI (NCDOI) coordinated with law enforcement agencies, emergency management, fire departments, rescue squads, charities, churches, and civic groups to do everything it could at the state and local level to assist the victims. The NCDOI's consumer assistance department was on the ground for three weeks to help with insurance claims and other needs.

Preparing for a Disaster – NCDOI Coordinates Efforts in Preparing for a Disaster



Community Outreach Prior to a Disaster

The NCDOI provides outreach to its communities before any type of disaster. During the outreach, the DOI:

Education	• The NCDOI educates the public on disaster preparedness.
Distribution of Materials	• The NCDOI provides public information to consumers at community events, fairs, festivals, and on its website. • Suggests that catastrophe insurance adjusters take a course on state-specific items in policies, developed by the agent services division of the NCDOI. • The NCDOI provides a free flood continuing education course to agents, adjusters, public adjusters, realtors, architects, and engineers.
Coordinate Efforts	• Ensure that consumers and licensees can reach the the NCDOI. • Its telephone system allows NCDOI employees to take calls remotely.

NCDOI Actions Following a Disaster

A web page was created and updated with information about the NCDOI's recovery efforts following the Hurricane Helene.

Needs Assessment	• The commissioner visits the disaster area (if possible), and insurance needs are assessed.
Insurance Camps	• Insurance camps are set up if there is widespread catastrophic damage. • These camps serve as a centralized hub where multiple insurance companies can set up a mobile office. • Insurance companies are able to assist survivors with their specific insurance claims.
Victim Assistance Center	• This center is set up amid localized damage, where assistance is needed for a longer period of time. • It serves as a centralized hub where survivors can receive specific assistance from multiple agencies, community assistance groups, and volunteer organizations.

Bulletins Issued Prior to Hurricane Helene

On **Aug. 6,** the NCDOI issued Bulletin Number 24-B-08 in anticipation of a severe weather event.

The NCDOI issued Bulletin Number 24-B-12 on **Sept. 25** to insurers, reminding them of health benefit plan compliance requirements for operations under a state of emergency, specifically for obtaining extra prescriptions during a state of emergency or disaster.

Post-Disaster Response

Victim Assistance Centers

Three victim assistance centers (VACs) opened in Boone and Banner Elk on **Oct. 8, 10, and 11**, to aid those affected by Hurricane Helene. Additional VACs were open in the towns of Jefferson, Sugar Grove, and Beech Mountain, **Oct. 15–17**. These centers were open from 9 a.m. to 4 p.m. each day, with NCDOI staff on hand to offer their expertise and assistance to the public.

In opening the VACs, the NCDOI coordinated with law enforcement agencies, emergency management, fire departments, rescue squads, charities, churches, and civic groups to provide assistance to victims. The NCDOI also continued to host events to support policyholders with their insurance claims after the VACs closed.

The VACs were crucial in helping the NCDOI directly reach the people in need. The NCDOI continued to operate these VACs as needed to provide valuable resources and support to storm victims.

Insurance Camps

The NCDOI opened two insurance camps on **Oct. 23–24** to enable collaboration with insurers on the ground, providing storm victims with direct access to their insurance companies.

Local, state, and federal agencies responding to Hurricane Helene were also present and participated in the insurance camp. The camps were open to the public and credentialed media.

After the camps closed, the NCDOI continued to coordinate with its partners in law enforcement, emergency management, fire and rescue, charities, churches, and civic groups to assist victims. The NCDOI hosted future events to assist with insurance claims and other matters as needed.

Medicare Special Enrollment Period

The NCDOI implemented a Special Enrollment Period (SEP) to allow anyone affected by the disaster who missed the Medicare election period to make changes for the duration of the disaster, plus an additional two months. The normal Medicare Enrollment period ran from Oct. 15 to Dec. 7, with coverage taking effect January 1, 2025.[4]

Bulletins Issued After Hurricane Helene

On **Oct. 2,** Bulletin Number 24-B-15 - Relief for Insureds Affected by Tropical Storm Helene (COUNTIES AMENDED) was issued to amend counties listed in previous bulletins.

[4] Special Enrollment Period for Medicare Recipients Affected by Helene's Damage | N.C. Cooperative Extension. https://transylvania.ces.ncsu.edu/2024/10/special-enrollment-period-for-medicare-recipients-affected-by-helenes-damage/

The NCDOI issued Bulletin Number 24-B-17 - Hurricane Helene Data Call on **Oct. 17** to all insurers writing property/casualty (P/C) coverage in North Carolina to make them aware of a data call resulting from Hurricane Helene claims.

On **Oct. 28,** Bulletin Number 24-B-13 - Tropical Storm Helene Disaster Declaration was issued, providing stay of proof of loss requirements and premium and debt deferrals. This bulletin also amended the list of included counties.

On **Oct. 31,** Bulletin Number 24-B-18 - FEMA Related Coverage Inquiries – Helene was issued, reminding insurers of the requirements of N.C. General Statute § 58-36-115 regarding policyholder inquiries seeking financial assistance from FEMA. It advised that insurers should not take underwriting actions, such as consent to rate adjustments or policy modifications, in response to flood-related claims or inquiries on homeowners insurance policies when no coverage exists.

The NCDOI issued Bulletin Numbers 24-B-15 - Additional Relief for Insureds Affected by Tropical Storm Helene and 24-B-16 - Additional Relief for Insureds Affected by Tropical Storm Helene (COUNTIES AMENDED) on **Nov. 14** and were sent to insurers and other entities offering health benefit plans to North Carolina residents. This advisory was in addition to Bulletin Numbers 24-B-12 - Extra RX During State of Emergency and 24-B-13 - Tropical Storm Helene – North Carolina Operations, as well as Advisory 24-B-15 - Relief for Insureds Affected by Tropical Storm Helene.

Providers, such as pharmacies, should be able to focus on helping insured individuals or those recovering from disasters instead of focusing on audits. The NCDOI requested that insurers direct any contracted pharmacy benefit managers, third-party administrators, or entities contracted to conduct pharmacy audits to immediately suspend these audits for a minimum of 30 days.

Insurance Company Phone Numbers and Agent Lookup

The NCDOI posts a listing of insurance company names, as well as other regulated entities and their corresponding phone numbers on its website and provides a help number for policyholders who cannot find their insurance company and phone number on the list.

The NCDOI also provides a link to the NAIC SBS on its website, allowing policyholders to look up their insurance agent's information, including their phone number and other relevant details.

Dashboard Information, North Carolina Emergency Management website:

When Tropical System Helene hit North Carolina in late September 2024, the western Appalachian region was hit the hardest. The region experienced significant flooding, mudslides, and widespread destruction. This was one of the deadliest and most expensive storms ever seen in the region.

The North Carolina State Emergency Response Team created a dashboard that illustrates the storm's impact and the resulting response from the team. Recovery information through December 11, 2024 is available. The dashboard provides users with charts, maps, and other information related to the event and response efforts.

By visiting the North Carolina Emergency Management website and clicking on “Visit the Helene Retrospective Dashboard” button, the user can see the impact of the storm as well as the response by the North Carolina State Emergency Response Team (SERT). The recovery information is provided **through December 11, 2024**, unless stated otherwise. Users can view each of the functional areas and see maps, charts, and other information that provide details about the event and response.

Disaster Mediation Program

Some, but not all states have established mediation programs.

Eligible individuals who have had a homeowners insurance claim partially or completely denied can request a mediation conference where an independent mediator with no connection to the insurance company will facilitate discussion between the insurance company and the policyholder to help them reach a resolution.

What Is a Disaster Mediation Program?

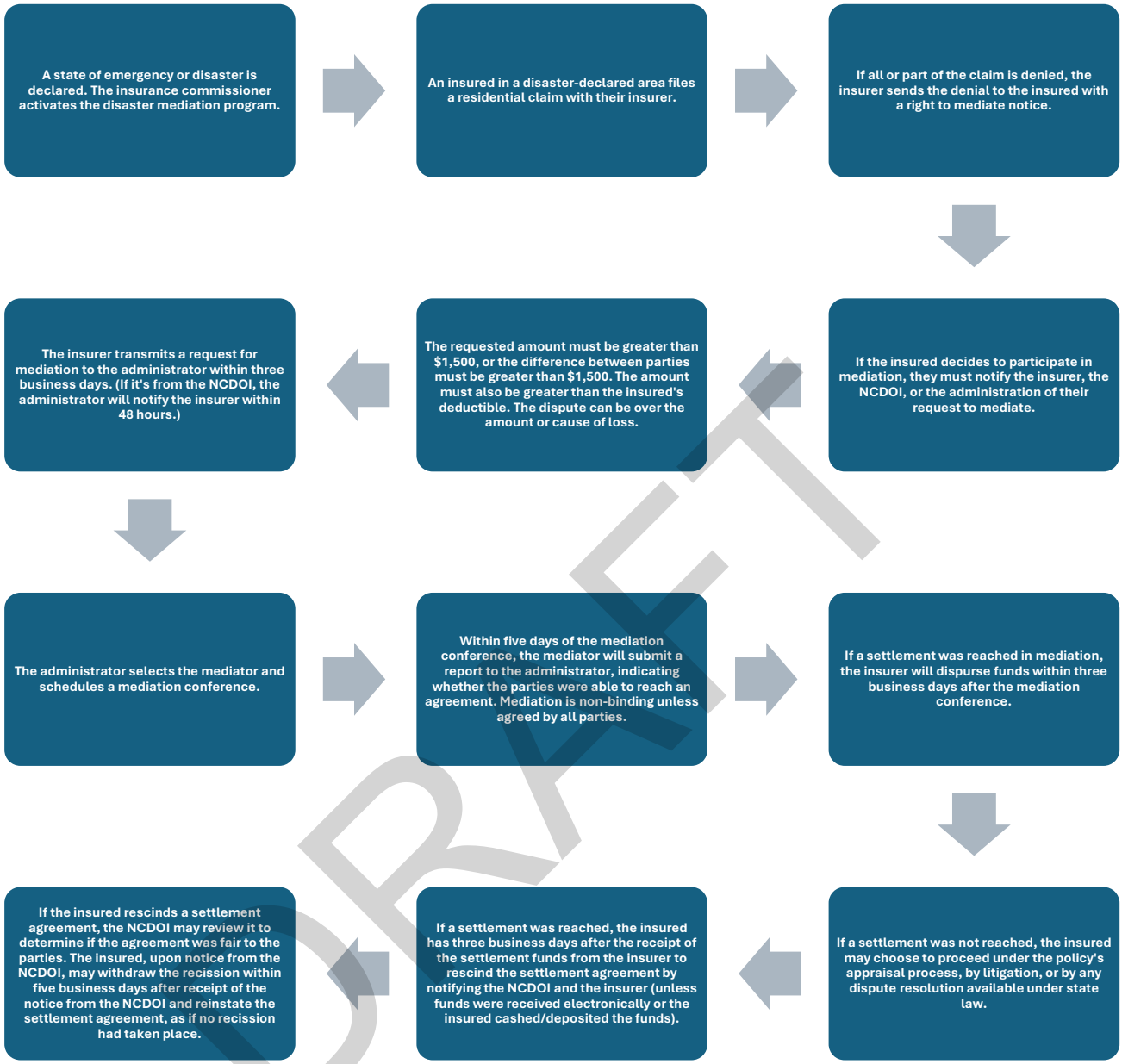
A Disaster Mediation Program is an alternative option for consumers to facilitate the fair and timely handling of disputed residential property insurance claims arising from certain natural disasters.

It gives a consumer the right to attend a mediation conference with their insurance company to resolve such claim disputes. An independent mediator, with no connection to the insurance company, will oversee the mediation conference.

During the mediation conference, a neutral mediator is present to help the consumer and the insurance company reach an acceptable resolution to the disputed claim. However, the mediator cannot make a decision regarding the settlement of the claim.

In North Carolina, the insurance commissioner is permitted to issue an order activating a disaster mediation program following a state of disaster declared by the governor or the president.

North Carolina Disaster Mediation Conference Requirements



5. Hear a Presentation on Private Flood Insurance and Discuss the Flood Insurance Blueprint

Attachment Five

–Aaron Brandenburg (NAIC) and Mike Peterson (CA)

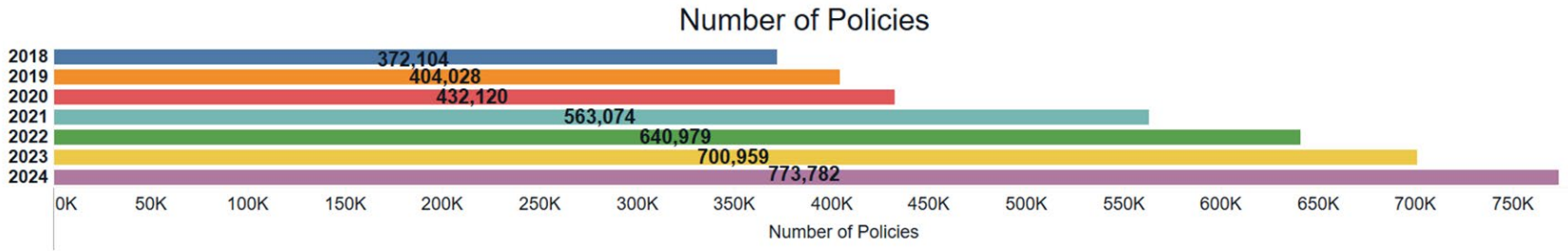
Private Flood Insurance Data

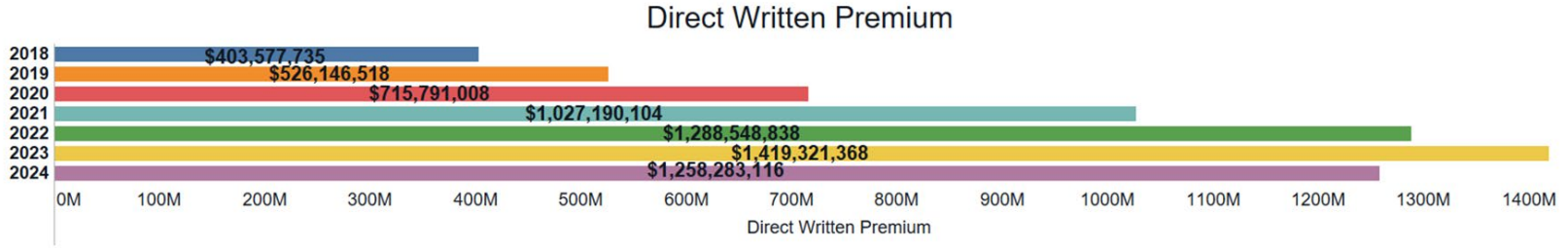
Climate and Resiliency (EX) Task Force

Dec. 9, 2025

Private Flood - Commercial and Residential (from Annual Statement Supplement)

- Includes Standalone and Endorsements
- 773K Policies in Force at end of 2024
- $1.25 Billion in DWP for 2024

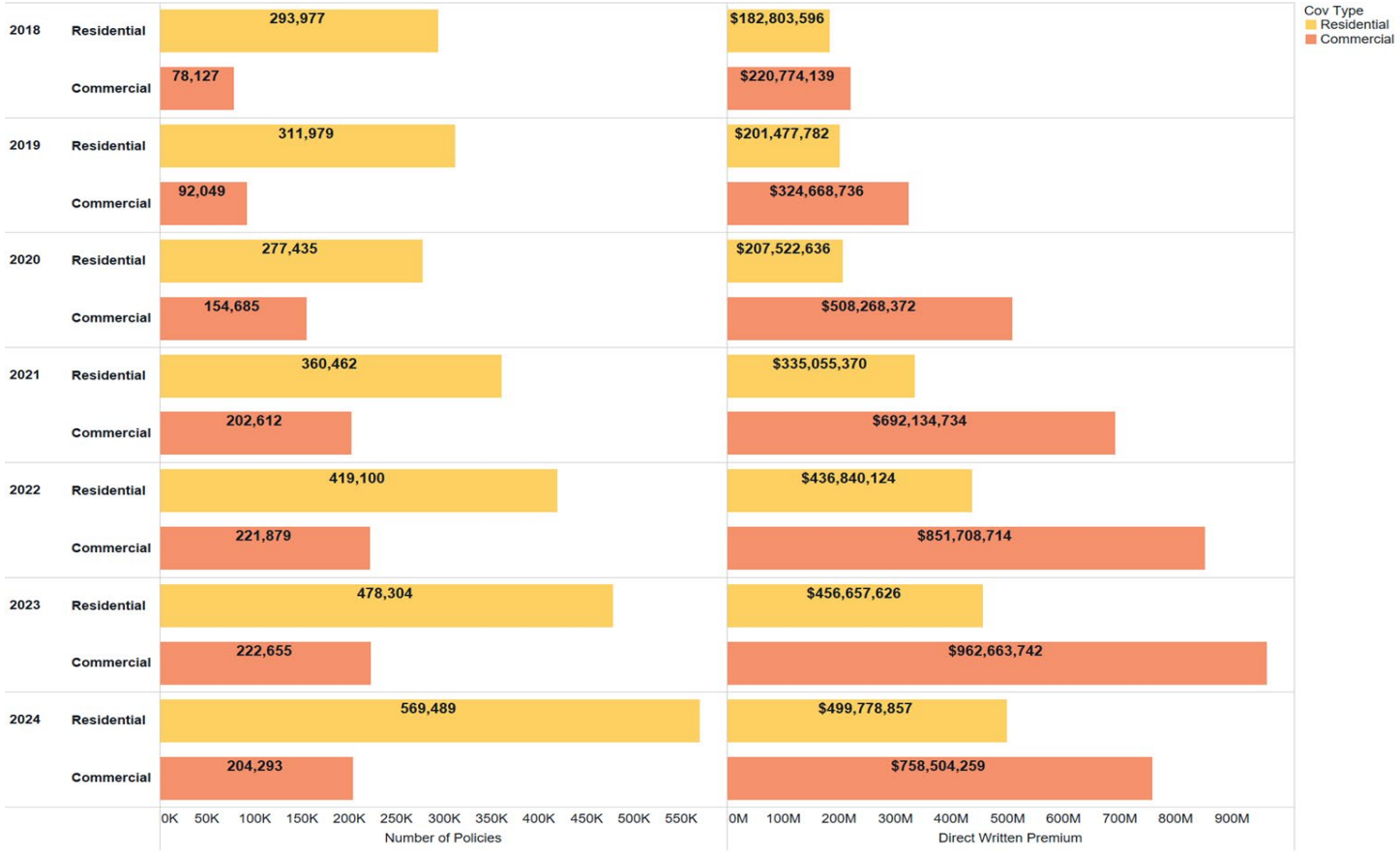




Policies and Premiums – Commercial and Residential

Number of Policies

Direct Written Premium



State Comparisons

- Highest Loss Ratios (2024): SD, IA, ME, NH, TN **(see map)**
- States with most residential premium written (2024): FL, TX, NJ, CA, NY
- Highest Losses (2024): FL, CA, TX, NC, NY
- 27 insurer groups wrote over $1M in residential premium in 2024
  - Largest writers wrote $101M and $96M

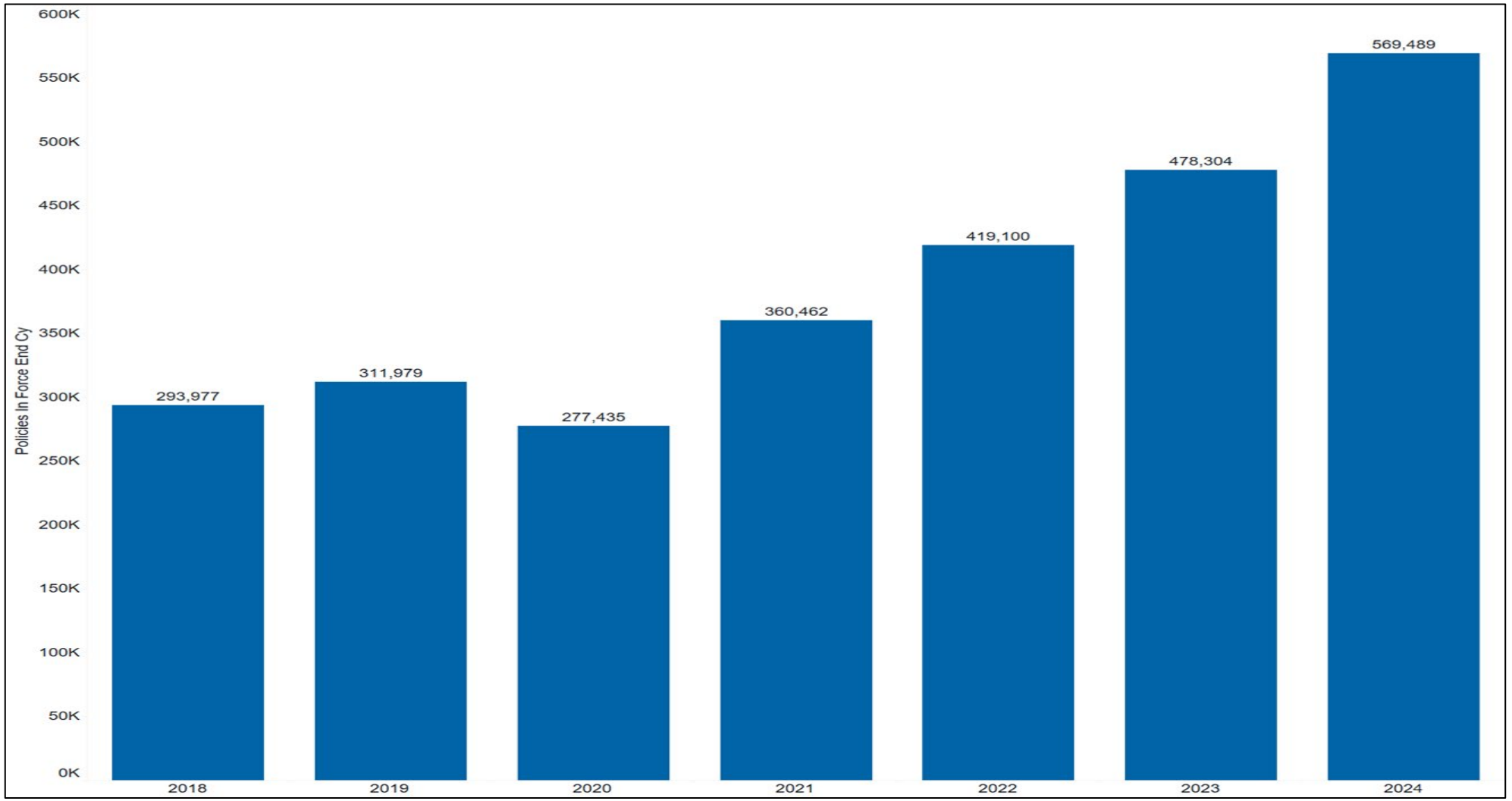
Private Flood Top 15 Insurers - Residential

- $370M in 2024
- Over 81% of Direct Written Premium

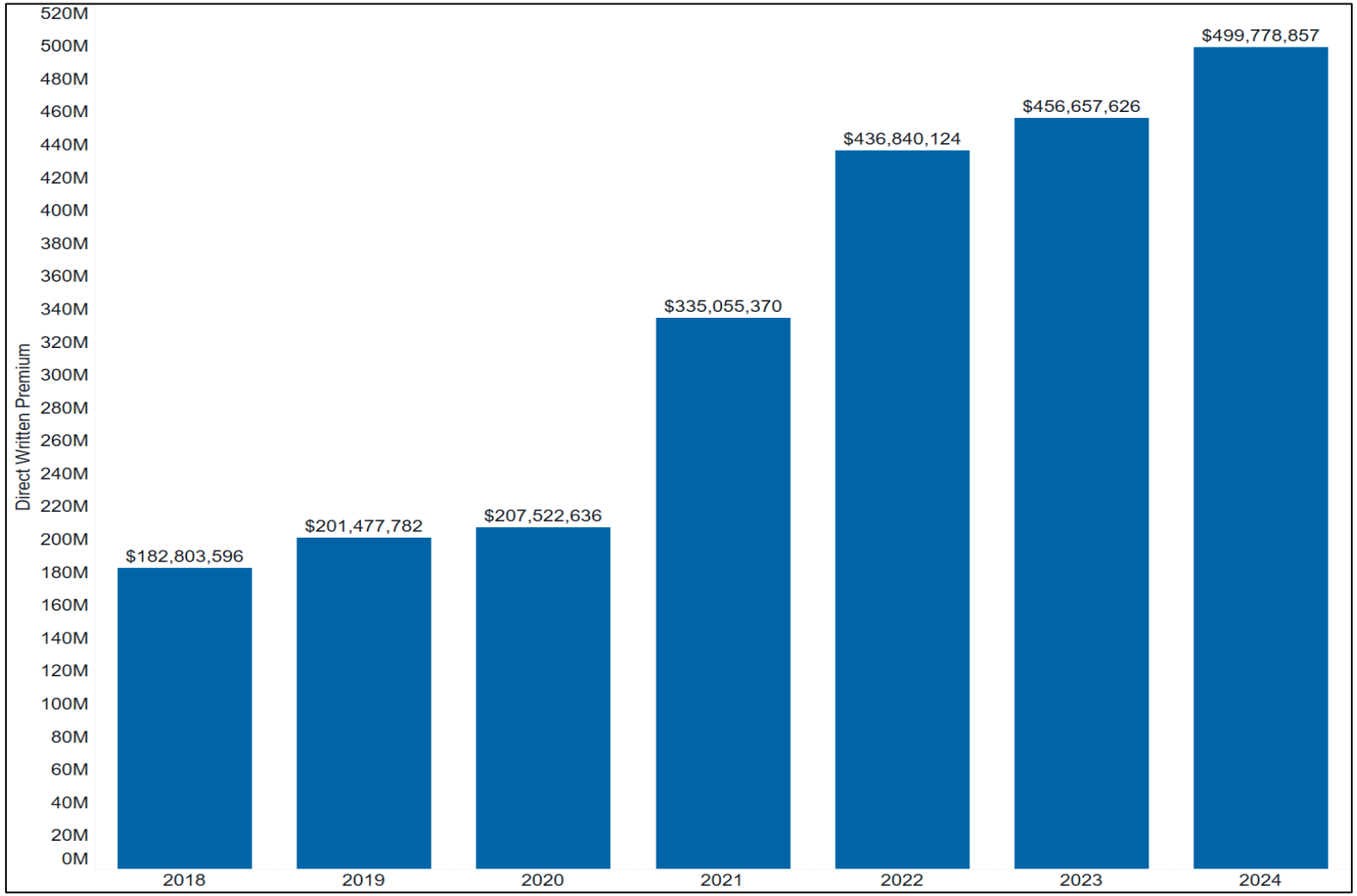
Direct Written Premium Market Share

NAIC Company Code	Company Name	Market Share
36940	Indian Harbor Ins Co	17.59%
41807	Transverse Specialty Ins Co	14.08%
20281	Federal Ins Co	8.76%
19437	Lexington Ins Co	5.90%
29742	Integon Natl Ins Co	5.33%
12873	Privilege Underwriters Recp Exch	5.18%
20338	Palomar Specialty Ins Co	3.81%
16188	Trisura Specialty Ins Co	3.54%
19402	AIG Prop Cas Co	3.38%
31690	Mapfre Pan Amer Ins Co	2.98%
42781	Direct Gen Ins Co	2.95%
11090	Incline Cas Co	2.14%
10389	Agent Alliance Ins Co	1.97%
23337	American European Ins Co	1.76%
20079	National Fire & Marine Ins Co	1.76%

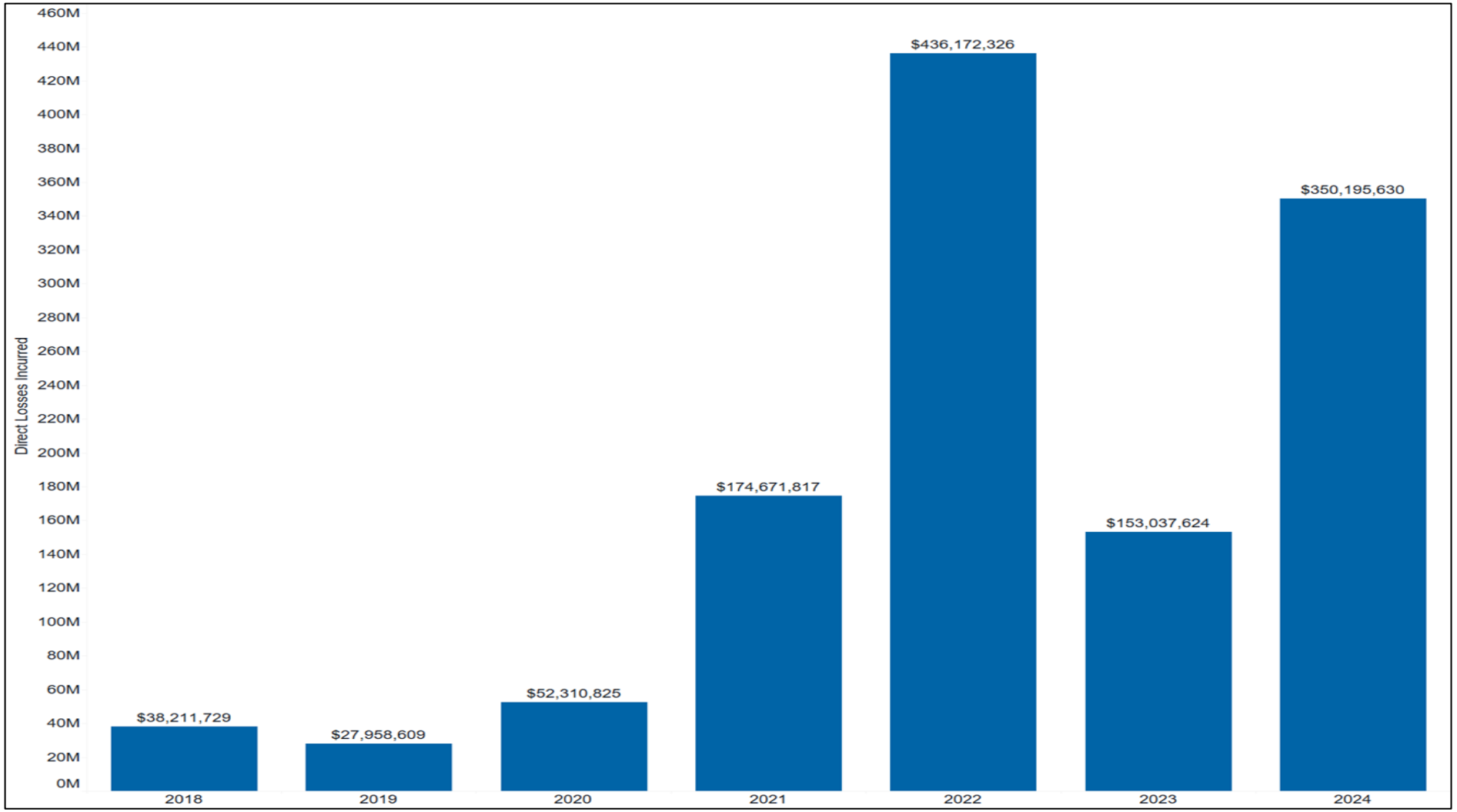
Private Flood Policies in Force - Residential



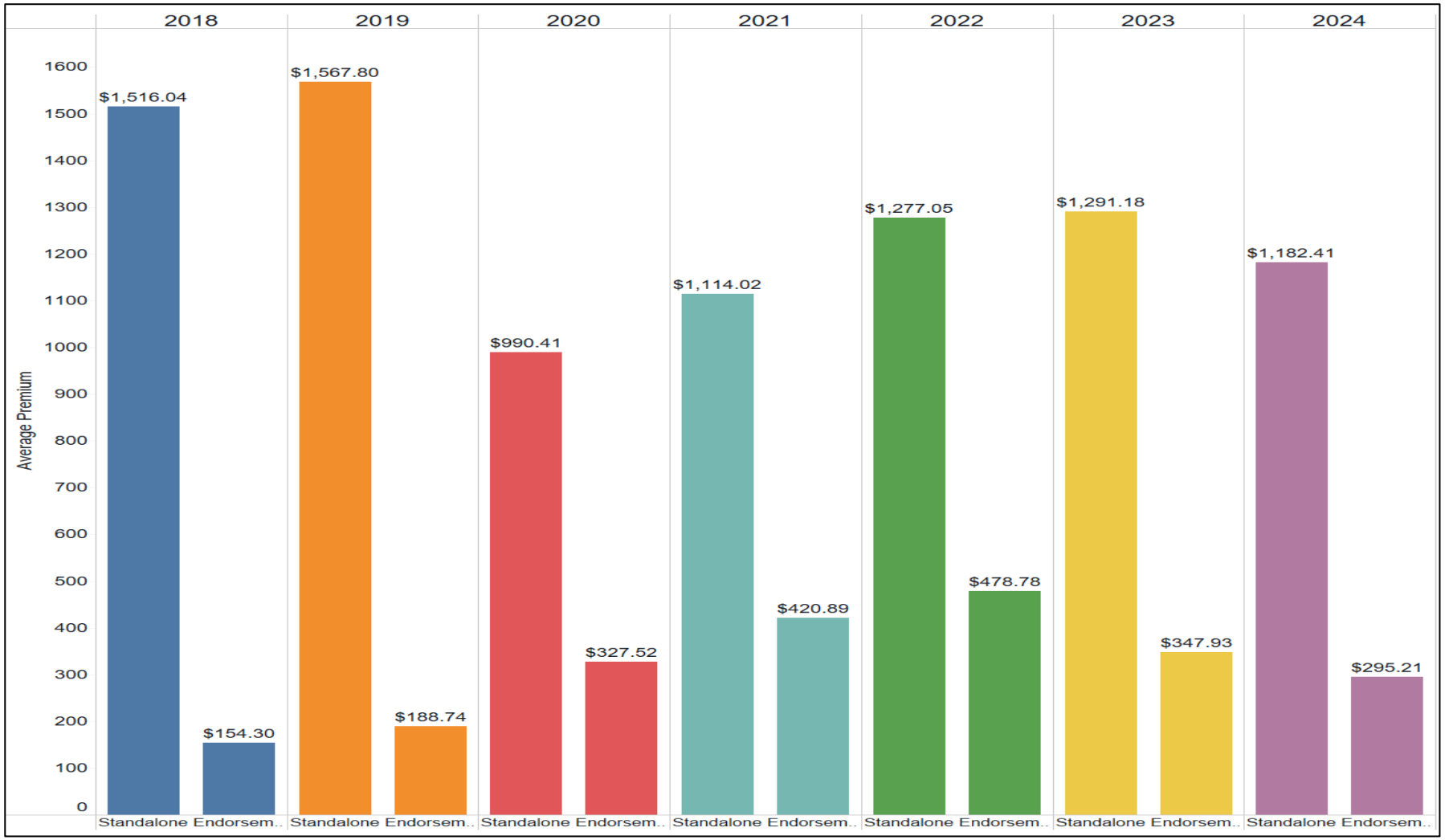
Private Flood Direct Written Premium - Residential



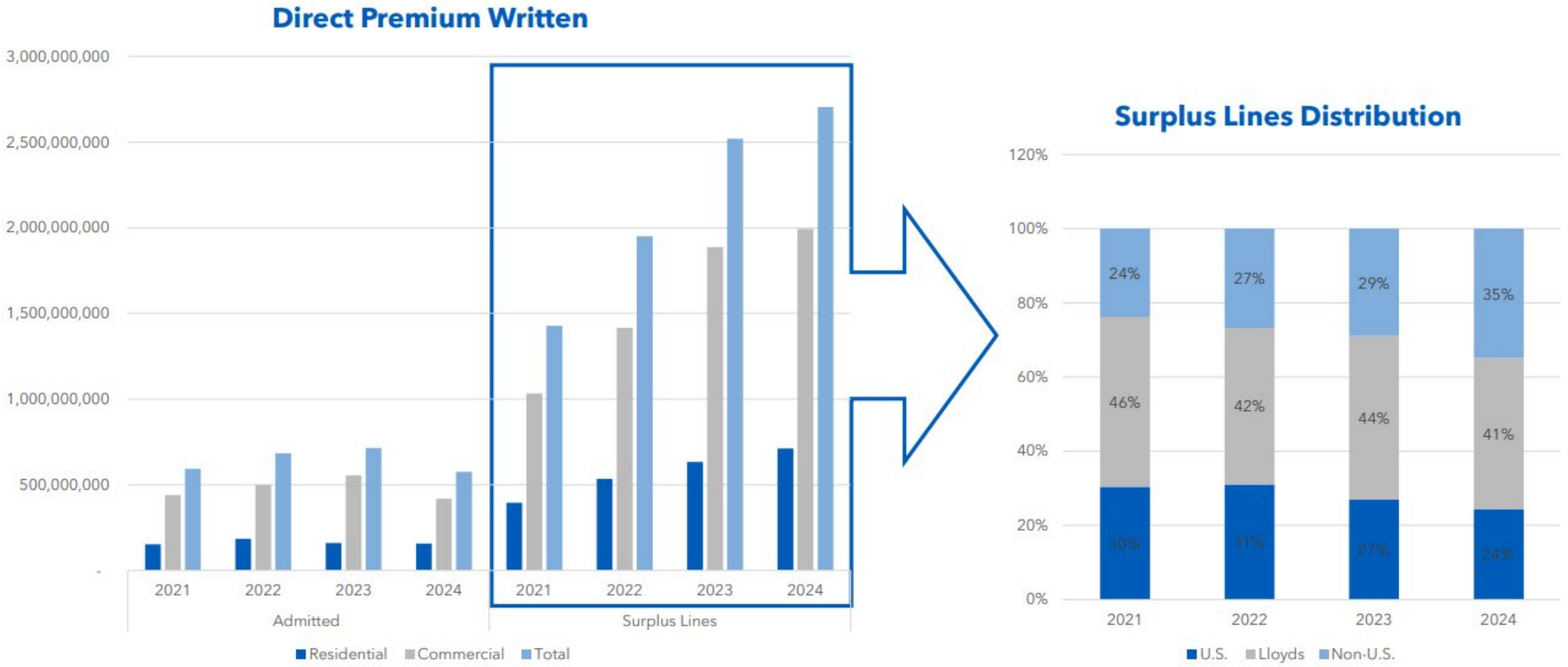
Private Flood Direct Losses Incurred - Residential



Private Flood Average Premium - Residential



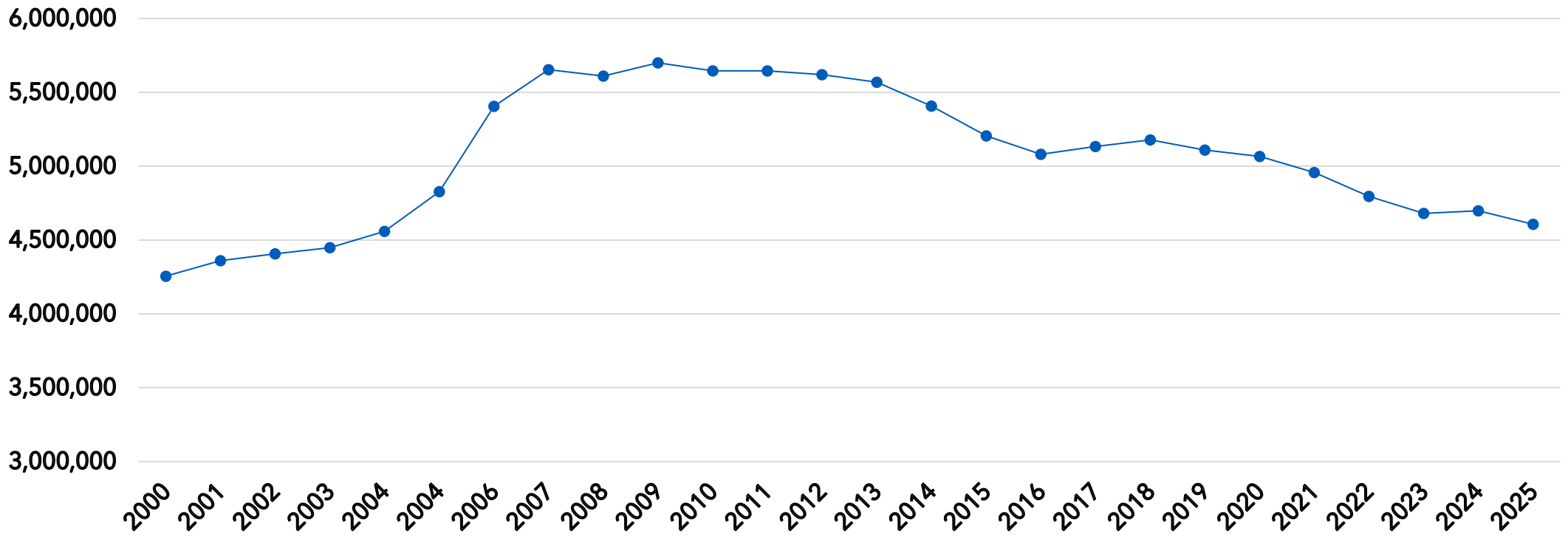
Surplus Lines



Private Flood Market w/Surplus Lines

Private Flood							
	U.S. Domestic 2024		Non-U.S. 2024		Total Surplus Lines 2024	Total Admitted & Surplus Lines 2024	Total Admitted & Surplus Lines 2023
	Admitted	Surplus Lines	Lloyd's Syndicates	Alien Companies			
Total Direct Premiums Written	$575,808,990	$660,051,120	$1,102,281,706	$942,433,209	$2,704,766,035	$3,280,575,025	$3,234,688,860
Residential	$157,047,036	$319,929,397	$353,892,232	$37,621,321	$711,442,950	$868,489,986	$793,552,406
Commercial	$418,761,954	$340,121,723	$748,389,474	$904,811,888	$1,993,323,085	$2,412,085,039	$2,441,136,454
Number of Policies in Force	452,144	311,708	192,277	83,044	587,029	1,039,173	895,758
Residential	299,757	259,648	164,239	34,502	458,389	758,146	624,813
Commercial	152,387	52,060	28,038	48,542	128,640	281,027	270,945
Number of Claims Reported	851	1,684	5,402	3,200	10,286	11,137	7,138
Residential	554	1,482	2,474	932	4,888	5,442	2,996
Commercial	297	202	2,928	2,268	5,398	5,695	4,142

NFIP Policies in Force

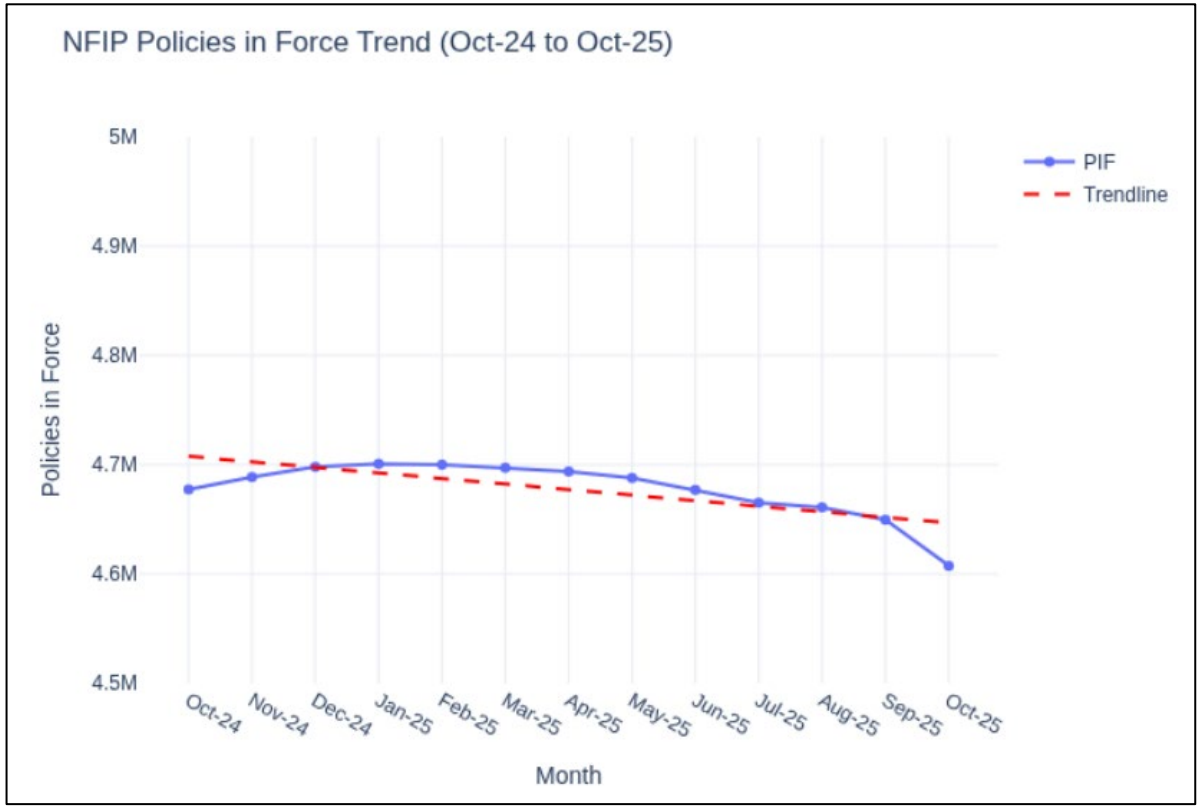


National Flood Insurance Program

- Outside of Florida and North Carolina over the last year, there's been negative growth in the NFIP.

- NFIP Policies decreased 1.5% (54,149 policies) from October 2024 to October 2025.
  - Economy
  - Govt. shutdown
  - Quiet hurricane season/flood season
  - NFIP stopped advertising

NFIP Number of Policies
October 2024 through October 2025



Attachment Five

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Flood Insurance Blueprint

Mike Peterson, California Dept of Insurance
December 9, 2025
Presentation - NAIC Climate and Resiliency Task Force

NAIC Flood Insurance Blueprint

- Launch a national initiative to increase awareness of flood risk and risk mitigation recommendations
- Close protection gaps by growing private flood insurance options
- Create new partnerships with universities in state jurisdictions to conduct localized risk assessments and risk mitigation strategies
- Build stronger communication with state and local governments to support more effective risk awareness
- Expand advocacy for state and federal funding to reduce flood risks.

Attachment Five

Visual from ***Scientific American,*** 2022

NAIC Flood Insurance Blueprint

- Risk Awareness Initiative
- Risk mitigation planning and funding
- Flood Insurance Market Data
- Catastrophe Modeling Research
- Interagency Workstreams
- University Partnerships
- Innovative products

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Flood Insurance Blueprint

Mike Peterson, California Dept of Insurance
December 9, 2025
Presentation - NAIC Climate and Resiliency Task Force

7. Hear an Update from the Center for Insurance Policy and Research (CIPR) Catastrophe Risk Management Center (COE)

–Jeff Czajkowski (NAIC) & Brian Powell (NAIC)

Attachment Six

CAT COE Training for Regulators

CAT 101 (Beginner) ✓ → **CAT 201 (Intermediate)** ✓ → **Future Courses (Application)**

Available Now

Basics of CAT Modeling

Available Now

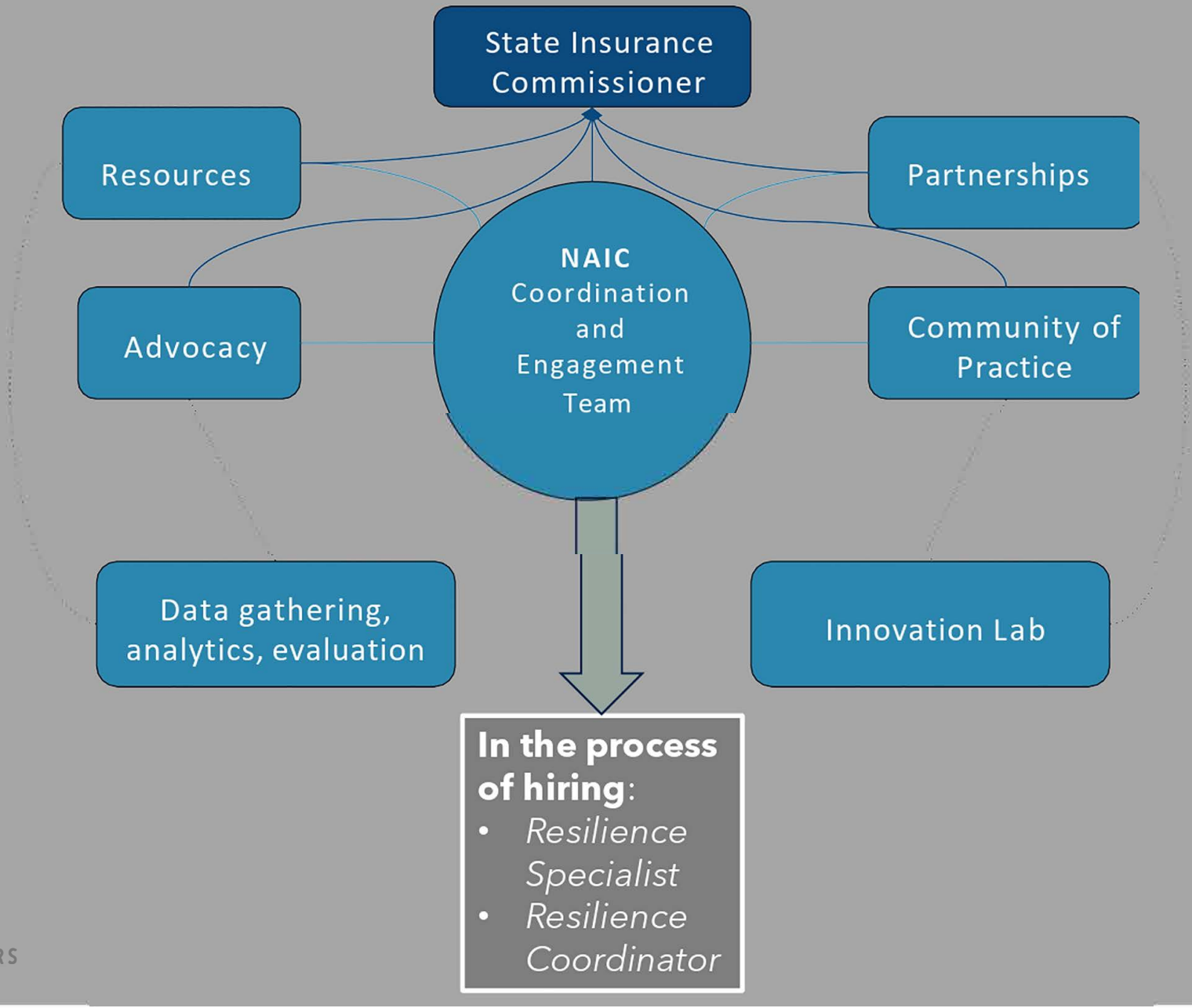
Basics of Severe Convective Storm Modeling

Under Development

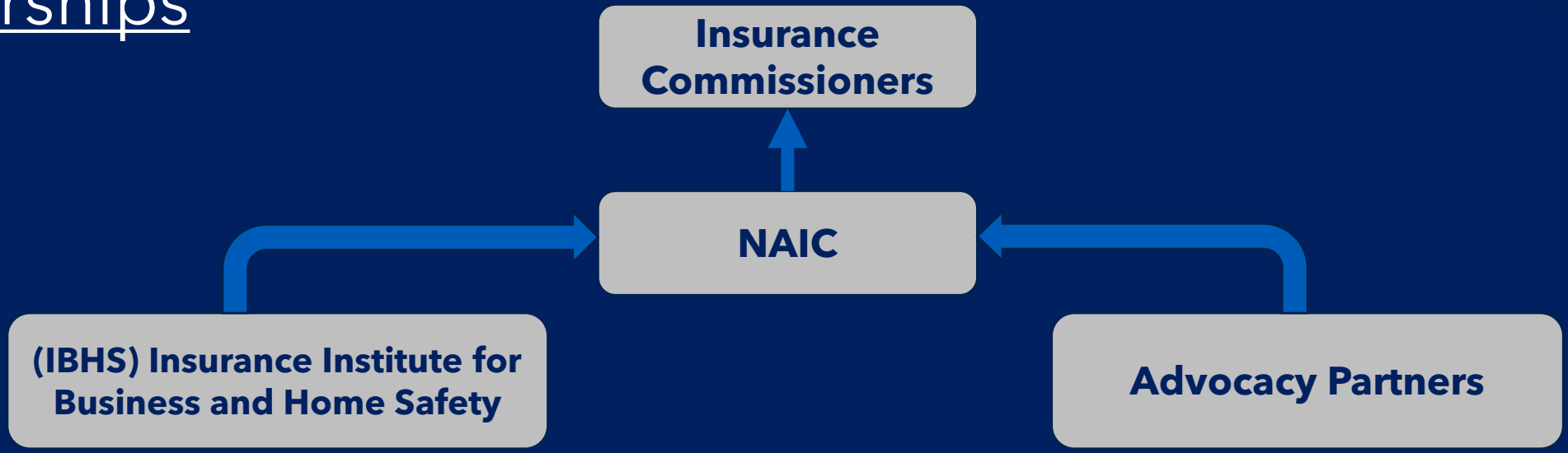
- CAT & Climate Risk Course for Financial Regulators
- Use of CAT Models in P&C Rate Filings
- Reinsurance & Alternative Risk Transfer
- Resilience

Resilience HUB

Mitigation and Resilience Assistance



Partnerships



- Defined role to play for the success of a program.
- Tools/capabilities/resources that compliment each other and are necessary for the success of a program
- Have successfully helped establish mitigation grant programs across the country.
- Through this partnership, states have continuous support.

Attachment Six

Status of State Level Mitigation Grant Programs across the US as of 12/1/2025

Supporting existing DOI mitigation grant program in operation

1. Alabama
2. Louisiana
3. South Carolina (*Does not use the IBHS Fortified™ standard*)
4. Oklahoma

Existing non-DOI mitigation grant programs

1. Florida*
2. North Carolina**

*Florida Department of Financial Services
** Wind Pool program

Authority to establish a DOI mitigation grant program

1. Arkansas
2. Kentucky
3. Maine
4. Minnesota
5. Mississippi
6. New Mexico

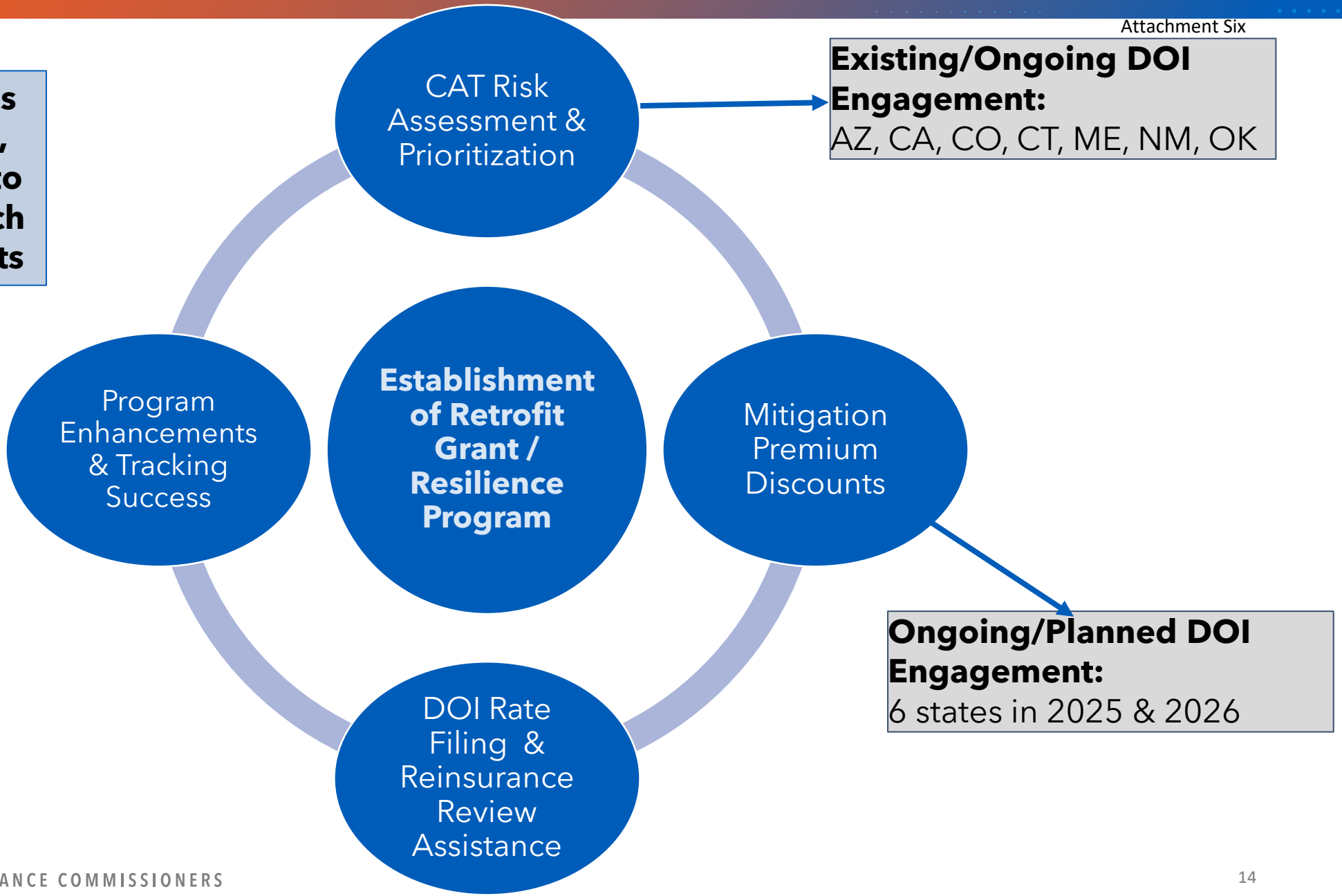
Working with states planning wildfire mitigation programs:

- Washington
- New Mexico

Working with states that exceed mitigation measures for concerns in their own market:

- Connecticut
- Maine

NAIC's CAT COE has the technical skills, tools, and training to assist DOIs with each of these components



Existing/Ongoing DOI Engagement:
AZ, CA, CO, CT, ME, NM, OK

Ongoing/Planned DOI Engagement:
6 states in 2025 & 2026