

## **HOMEOWNERS MARKET DATA CALL (C) TASK FORCE**

Homeowners Market Data Call (C) Task Force Aug. 12, 2025, Minutes

Homeowners Market Data Call (C) Task Force May 12, 2025, Minutes (Attachment One)

## Draft Pending Adoption

Draft: 8/20/25

### Homeowners Market Data Call (C) Task Force Minneapolis, Minnesota August 12, 2025

Homeowners Market Data Call (C) Task Force met in Minneapolis, MN, Aug. 12, 2025. The following Task Force members participated: Michael Yaworsky, Chair (FL); Ann Gillespie, Vice Chair (IL); Ricardo Lara represented by Michael Peterson (CA); Michael Conway represented by Jason Lapham (CO); Marie Grant represented by Raymond A. Guzman (MD); Angela L. Nelson and Jo A. LeDuc (MO); Michael Humphreys and Michael McKenney (PA); Elizabeth Kelleher Dwyer represented by Matthew Gendron (RI); Michael Wise (SC); Larry D. Deiter represented by Tony Dorschner (SD); Cassie Brown, Marianne Baker, and Nicole Elliott (TX); and Scott A. White and Eric Lowe (VA). Also participating were: Lori Dreaver Munn (AZ); Wanchin Chou and George Bradner (CT); Ann Gillespie and Nicole Crockett (FL); Robert L. Carey (ME); Christian Citarella (NH); Peter Brickwedde and Phil Vigliaturo (MN); Justin Zimmerman (NJ); and Tom Botsko (OH).

#### 1. Adopted its May 12 Minutes

The Task Force met May 12. During this meeting, the Task Force took the following action: 1) reviewed its 2025 purpose and charges; 2) heard from Kay Noonan (NAIC) regarding confidentiality protections and data sharing; 3) heard an overview from Jeff Czajkowski (NAIC) on Center for Insurance Policy and Research (CIPR) research to assist the launch of Oklahoma's Strengthen Oklahoma Homes pilot; and 4) heard from the Data Call Drafting Group.

The Task Force also met Aug. 4, June 16, June 2, and April 28 in regulator-to-regulator session, pursuant to paragraph 3 (specific companies, entities, or individuals) of the NAIC Policy Statement on Open Meetings.

Director Nelson made a motion, seconded by Director Deiter, to adopt the Task Force's May 12 minutes (Attachment One). The motion passed unanimously.

#### 2. Discussed Potential Revisions to the Homeowners Market Data Call Template and Definitions

Commissioner Yaworsky said proposed revisions to the homeowners data call template and definitions were exposed Aug. 6 for a public comment period ending Sept. 8. A summary document describes the process and changes. The Drafting Group has been reviewing the data collected since it was received in June 2024 and has worked with companies to understand and improve the data quality moving forward. The Drafting Group, led by Sandra Darby (ME) and Eric Lowe (VA), held weekly meetings with regulators to discuss how to improve definitions and data elements and consider what other elements might be needed.

Commissioner Yaworsky said the Task Force provided feedback on those recommendations and is now accepting input from interested parties. The new template collects additional policy forms, such as renters, condominium owners, and mobile home. Premium and policies in force, as well as coverage limits, are being asked on an "as of Dec. 31" basis, which the Task Force hopes will be easier for insurers to submit. Losses and claims are split by peril. Mitigation discounts are split by type of mitigation discount and collected on an average percentage discount rather than an aggregate dollar amount.

Commissioner Yaworsky explained that the data template notes that regulators are catching up with at least 2023 and 2024 data, but depending on timing, may request 2025 data in the next iteration as well. In addition, the Task Force is seeking feedback on how to collect square footage of dwellings data. That data point will not be included

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on the next data call, but regulators want to hear from companies how this data element could be requested and submitted by companies.

Commissioner Yaworsky said that this iteration of the data call, though it includes new elements, has been pared down from what the Drafting Group originally discussed and considered. He noted that in future years, additional elements may be added to the data call. He said comments on the template and definitions are due Sept. 8. The Task Force hopes to meet in open session in late September to discuss the comments.

Michael DeLong (Consumer Federation of America—CFA) said he is pleased the Task Force is proposing to collect data policy forms that cover renters, condominium owners, and mobile home. He also said that the CFA welcomes the collection of data on mitigation discounts broken down by the type of mitigation discount. There is a desire to have information on how many consumers are participating in these programs, how many are getting discounts, and to what extent those discounts are helping markets and lowering costs.

DeLong said data from residual markets should also be collected in the data call, as more consumers are enrolled in these plans in recent years. He said these homeowners tend to face the highest risks and highest premiums, and any picture of the homeowner's insurance market is going to be incomplete without them. DeLong also urged the Task Force to commit to making this data, or at least some of the data, public for policymakers, researchers, and advocates.

Ken Klein (Individual Consumer Advocate) said collecting good data on the adequacy and availability of coverage in the property/casualty (P/C) insurance space has been his primary research for a decade. He agreed that residual markets should be included and the data, even if aggregated, should be made public. He also said extended replacement cost (ERC) endorsements and incurred losses should be collected. He also said data on homes that are categorized as a total loss would be valuable, as well as catastrophe versus non-catastrophe losses. Klein said data on the insurance company's estimate of what would be the adequate amount to completely reconstruct a home would be valuable, as well as whether this matches Coverage A.

Commissioner Lara emphasized the overall value of this data as extremely valuable for understanding markets in real time, as catastrophes are happening, for planning purposes, communication purposes, and responding in real time to the press, consumers, governors, and legislators. He said California used the data to try to understand the exposure of the insurance companies that were directly impacted in the specific areas. California was able to use that information to plan consumer workshops within a couple of days.

Erica Weyhenmeyer (National Association of Mutual Insurance Companies—NAMIC) and Lisa Brown (American Property Casualty Insurance Association—APCIA) said the changes look substantial enough that insurers would need ample lead time to make the necessary system changes in order to fully respond to the data call.

### 3. Discussed its Next Steps

Director Gillespie explained that the Task Force is still discussing authority, confidentiality, and data sharing issues. At this point, it is likely that states will request the data according to the business written in their state. The Task Force will need to decide on a consistent threshold of data being requested from insurers. The Task Force will evaluate comments on the revised template and definitions and approve a final version. The Task Force will then share information about how the data will be collected and from what companies.

Director Gillespie said the Task Force's goal is to move judiciously and make sure the data call is done right. The work could be completed later in the fall, with data requested through data year 2024 to be submitted early next year, or the data call might not be issued until early 2026, allowing regulators to request data through data year

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2025, and ask for that data perhaps in May or June of next year. Ultimately, the Task Force hopes to get on a regular cycle of when data is requested and submitted, and when enhancements are reviewed and improved.

Superintendent Carey said it would be beneficial to collect data years 2023 and 2024 earlier and not wait until 2025 data is available in 2026. He asked the Task Force to consider a two-phase approach.

Having no further business, the Homeowners Market Data Call (C) Task Force adjourned.

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Draft: 6/12/25

Homeowners Market Data Call (C) Task Force  
Virtual Meeting  
May 12, 2025

The Homeowners Market Data Call (C) Task Force met May 12, 2025. The following Task Force members participated: Michael Yaworsky, Chair (FL); Ann Gillespie, Vice Chair (IL); Ricardo Lara represented by Kate Amano (CA); Michael Conway (CO); Marie Grant (MD); Angela L. Nelson (MO); Michael Humphreys represented by Michael McKenney (PA); Elizabeth Kelleher Dwyer represented by Matthew Gendron (RI); Michael Wise (SC); Larry D. Deiter represented by Tony Dorschner (SD); and Scott A. White represented by Eric Lowe and Jessica Baggarley (VA).

1. Reviewed Its Purpose and 2025 Charges

Commissioner Yaworsky reviewed the formation of the Task Force, stating that the 2024 Property & Casualty Market Intelligence (PCMI) Data Call was an effort to collect granular data about individual markets to help regulators better understand homeowners markets. For 2025, the data call has been reimagined to be tailored to the specific needs of the states. The Task Force was formed to provide guidance and oversight in a transparent manner with feedback from members, the public, and regulated entities. The data will be responsibly used in a variety of ways, as it is collected to ensure all parties involved have an understanding of it. Commissioner Yaworsky said the Task Force will also provide oversight to the data collection process and set guardrails and processes related to authority and confidentiality of the data. The intention is to keep this process open and transparent and ask for feedback from the industry and other participants during the process.

Commissioner Yaworsky said the Task Force's 2025 charges are to: 1) oversee development and delivery of periodic communication to the NAIC membership on issues related to the Homeowners Market Data Call; 2) develop a framework for the Homeowners Market Data Call, including data collection authority, confidentiality protections, and data sharing between states and the NAIC; 3) consider recommendations from the regulator-only drafting group and interested party input and approve any changes to the current scope and content of the data call for 2025; 4) oversee continued development of regulator tools and training related to the data call; and 5) develop a national analysis report, for regulators only, with support from the Center for Insurance Policy and Research (CIPR), and consider the nature and extent of such a national analysis report that may be suitable for public release.

Commissioner Yaworsky said this call would include information on the framework of the data call as well as potential changes to the data template.

2. Heard Background on Confidentiality Protections and Data Sharing

Kay Noonan (NAIC) stated that the goal in supporting the data collection for the states is to ensure the data collected is used as directed by the states. In response to objections last year to domestic regulators' authority to collect national data and support the multi-state cooperation as much as possible, the Task Force is discussing the possibility that the collection of ZIP code-level data will be based on the authority of the state where that policy is located. There is broad authority in state law to collect information as part of either a market conduct or financial surveillance exercise on behalf of the states, and as always, the NAIC will look at the collecting states to identify the authority and to provide the NAIC with direction on how that data should be used and shared.

Noonan stated the NAIC understands the critical importance of making sure company-specific data is treated with confidentiality, as it should be under the collecting authority. Under the law that allows for the market conduct or financial surveillance purposes, the NAIC is identified as a permissible recipient of confidential information, and, as in the past, the NAIC is prepared to enter into the appropriate confidentiality agreements with the states to make sure that confidentiality is protected. The agreements would identify the nature of the data being collected, the authority, and the confidential nature of the data, as well as define the permissible uses of that data and the tasks that the NAIC is asked to carry out in regard to that data. The agreements would also allow for data sharing at the direction of the collecting state.

Noonan said that, at this point, unlike last year, it is not anticipated that there will be sharing of data with the Federal Insurance Office (FIO); however, the FIO does have statutory data collection authority. If the FIO chooses to exercise its authority in this regard, one of its requirements is to first coordinate with the states. The NAIC would make every effort to look for direction from the states if there is a request from the FIO and coordinate that to the extent asked by the states.

Noonan restated that the goal is first and foremost to meet the specific needs of the states and then look to the states for any direction on state or national reporting or any data analysis that the NAIC may be asked to do. A national aggregate report may be anticipated, in which case the NAIC would look to the Task Force, as well as the terms of any of the specific agreements, as to what that report should entail.

Commissioner Yaworsky opened the call to questions. Birny Birnbaum (Center for Economic Justice—CEJ) expressed his concern about confidentiality in the use of the market conduct examination authority to collect the data. Birnbaum stated that there are many parties who have an interest in looking at what is happening in insurance markets, including consumers and local, state, and federal government entities. He said the idea that the state insurance regulator has the sole ability to interpret and utilize that data is deeply flawed. He said the CEJ urges the public release of data and the use of a statistical agent authority to collect the data.

### 3. Heard Case Study on Use of Data from Strengthen Oklahoma Homes

Jeff Czajkowski (CIPR) shared an overview of research done by the CIPR to assist Oklahoma in thinking through the launch of its Strengthen Oklahoma Homes pilot program, leveraging this data and other third-party data collected as a part of the process. Oklahoma has been working with the Catastrophe Modeling Center of Excellence (COE) to establish the resiliency program. They wanted to determine exactly which ZIP codes to launch the pilot program in. To start with, they identified the metropolitan area of Oklahoma City, which is the most populated portion of the state. To assist them, the CIPR looked at data from the Homeowners Market Data Call, including 219,000 policies in 121 ZIP codes and nearly \$700 million of direct premium written.

A framework was created to look at losses within those ZIP codes in order to understand how leveraging the Insurance Institute for Business & Home Safety (IBHS) fortified standards might help to lower losses. ZIP codes were ranked and overlaid with third-party information to better understand risks. Other metrics that signal market stress were evaluated, including rising premiums, non-renewals, and cancellations. Ultimately, Oklahoma was able to use this framework to identify seven ZIP codes where it could focus on 100 homes within the program. Czajkowski said a similar exercise was done with Tulsa for a pilot program. He said Oklahoma has found the data from the Homeowners Market Data Call valuable in implementing the Strengthen Oklahoma Homes program.

#### 4. Heard from the Data Call Drafting Group

Lowe said the Task Force's Data Call Drafting Group has been reviewing data since it was first due in June 2024 and is following up with companies when there are data issues. He said the group has reviewed all data elements and corresponding definitions, focusing on those that required refiled data or clarifying questions and explanations from companies. The primary goal is to update the data template and definitions to continue collecting valuable data for regulators while considering the challenges faced by companies with certain data elements last year. He said the data template will be better aligned with other NAIC data collection efforts. Lowe said the Drafting Group plans to complete the review and send an updated template and definitions document to the Task Force for review by the end of May.

Jennifer Rupp (Erie Insurance Group) asked if definitions would be aligned with the Market Conduct Annual Statement (MCAS). Lowe said the data call is hybrid in that separate definitions may align with different existing datasets. Commissioner Yaworsky also noted that the Innovation, Cybersecurity, and Technology (H) Committee has a Data Call Study Group that is looking at a unified data dictionary.

Ken Klein (Individual Consumer Advocate) said an academic paper comparing earthquake policy take-up rates in Canada to those in the U.S. found that the U.S. take-up rates were lower due to consumer distrust of insurance companies and government agencies. He said if the goal is to make good policy informed by data, the impact will be amplified if the data is made public so it can be verified by interested parties and consumers can trust it.

Birnbaum asked what the most significant data issues were in the prior data call. Lowe said defining policy forms was difficult for some companies. He said there was also confusion over policy exclusions. He said instructions and definitions are being improved. Birnbaum said it sounds like companies struggled with how they rolled up data, so it would make sense to submit data at a transactional level and have a statistical agent or the NAIC roll that data up. Birnbaum asked if the Task Force has considered leveraging statistical plans. Lowe said the statistical data Virginia receives is at a summary level, but he would find transactional data valuable in the future.

Birnbaum said he would like to present to the Task Force. He asked if the public could provide input on the definitions. Commissioner Yaworsky said the Task Force will be looking for feedback from all parties. He also noted that data quality tends to be lower in the early stages of a data call and will improve over time.

Lisa Brown (American Property Casualty Insurance Association—APCIA) asked if existing definitions would be used for the data call. Lowe said the data call is a hybrid data call, but it will rely on existing definitions wherever possible.

Having no further business, the Homeowners Market Data Call (C) Task Force adjourned.

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