NAIC/CONSUMER LIAISON COMMITTEE

Draft: 12/16/25

NAIC/Consumer Liaison Committee
Hollywood, Florida
December 8, 2025

The NAIC/Consumer Liaison Committee met in Hollywood, FL, Dec. 8, 2025. The following Liaison Committee members participated: Grace Arnold, Chair (MN); D.J. Bettencourt, Vice Chair (NH); Heather Carpenter (AK); Mark Fowler (AL); Jimmy Harris represented by Chris Erwin (AR); Peter M. Fuimaono (AS); Ricardo Lara (CA); Michael Conway (CO); Jared Kosky represented by Jim Caron (CT); Trinidad Navarro (DE); Michael Yaworsky represented by Christina Huff (FL); Dean L. Cameron represented by Randy Pipal (ID); Marie Grant (MD); Anita G. Fox represented by Renee Campbell (MI); Angela L. Nelson (MO); Mike Chaney represented by Aaron Cooper (MS); Jon Godfread (ND); Justin Zimmerman (NJ); Ned Gaines (NV); Judith L. French represented by Jana Jarrett (OH); Glen Mulready represented by Ashley Scott (OK); TK Keen (OR); Suzette M. Del Valle (PR); Cassie Brown (TX); Jon Pike (UT); Scott A. White represented by Zuhairah Tillinghast (VA); Patty Kuderer (WA); Nathan Houdek represented by Coral Manning (WI); Allan L. McVey represented by Rober Grishaber (WV); and Jeff Rude (WY).

1. Adopted its Nov. 14 and Summer National Meeting Minutes

The Liaison Committee met Nov. 14 and took the following action: 1) announced the reaffirmation of its 2025 mission statement for 2026.

Commissioner Bettencourt made a motion, seconded by Commissioner Fowler, to adopt the Liaison Committee's Nov. 14 (Attachment One) and Aug. 10 minutes (*see NAIC Proceedings – Summer 2025, NAIC/Consumer Liaison Committee*) minutes. The motion passed unanimously.

2. Observed Presentation of the Consumer Representatives' Excellence in Consumer Advocacy Awards

Carl Schmid (HIV+Hepatitis Policy Institute) presented the Bonnie Burns Excellence in Consumer Advocacy Award to Commissioner Godfread. Schmid acknowledged Commissioner Godfread's engagement with consumer representatives, his leadership during a challenging period in the insurance market, and his commitment to key issues, such as enhanced premium tax credits for health insurance. Schmid also recognized Godfread's contributions in advancing big data and artificial intelligence (AI) initiatives.

Amy Bach (United Policyholders—UP) presented the Brenda J. Cude Excellence in Consumer Advocacy Award to Michael Peterson, Deputy Commissioner for Climate and Sustainability at the California Department of Insurance (DOI). Bach commended Peterson's leadership in climate risk disclosure and his involvement with the Climate and Resiliency (EX) Task Force.

3. Received a Summary of the NAIC/Consumer Participation Board of Trustees Meeting

Commissioner Arnold said the Board of Trustees met Dec. 8. During this meeting, it appointed consumer representatives for 2026, with notifications expected in late December or early January and a public announcement in late January. The Board of Trustees discussed a 2026 scholarship program aimed at expanding consumer program recruitment. The Board of Trustees discussed enhancing procedures for handling consumer representatives' requests for action by directing these requests to the appropriate committee chairs for review and prioritization.

4. <u>Heard a Presentation From UP on California Wildfire Risk Reduction, the IBHS Certification Program, and a Sustainable Insurance Strategy</u>

Bach said California and Colorado are facing insurance availability and affordability issues in their homeowners marketplace. Bach said factors such as wildfires, hail, rising construction costs, disputes over rate adequacy, and the adoption of new technologies, including risk scoring and aerial surveillance, are contributing to the availability and affordability issues. Bach said a wide range of stakeholders, including state insurance regulators, insurance companies, lenders, and scientists are working together to develop solutions. The leading strategy centers on increasing the number of "hardened" structures, which are homes and businesses with enhanced roofs and defensible space that follow scientific and firefighting recommendations.

Bach referenced the following risk reduction initiatives: 1) establishing official standards for risk reduction and mitigation; 2) legally mandating that insurance models and rates account for mitigation efforts; promoting attractive landscaping that also meets safety standards; 3) identifying do-it-yourself and low-cost mitigation measures for property owners; 4) providing lists of qualified vendors to assist with risk reduction projects; 5) offering public and private financial assistance and matching grants to support mitigation; and 6) addressing concerns related to the removal of beneficial trees as part of risk reduction.

Bach said education is a key component to these efforts. She said these initiatives should include teaching property owners about mitigation techniques, strengthening building codes and their enforcement, and developing consumer-friendly certification programs that help homeowners demonstrate risk reduction to insurance companies. Bach also stressed the importance of inviting insurance company representatives to tour communities that have shown dedication to risk reduction.

Bach said there has been growth in Firewise certification and grant programs. Bach said Firewise certification is expanding quickly, with 1,000 Firewise USA communities in California. Bach said nearly half of these communities have been established since 2023. Colorado ranks third nationally for Firewise communities, and both states are pioneering grant programs that facilitate easier access to mitigation assistance for households.

Bach said UP recently received a grant to develop an interactive statewide map featuring preparedness resources. UP is also conducting ongoing homeowner surveys in California and Colorado to better understand consumer needs and challenges. Bach said UP collaborates with agencies to deliver webinars, publish educational materials, and conduct outreach, and it remains open to further partnerships to advance these efforts.

5. <u>Heard a Presentation from the CFA Titled “Penalized: The Hidden Cost of Credit Scores in Homeowners Insurance Premiums”</u>

Michael DeLong (Consumer Federation of America—CFA) presented a joint report prepared in collaboration with the Climate and Community Institute (CCI). The report analyzed more than 600,000 homeowners insurance quotes to assess how credit scores influence insurance premiums. DeLong said insurance companies consider numerous factors when pricing policies, including socioeconomic indicators such as credit scores. DeLong said using credit scores results in unfair discrimination against certain consumers.

DeLong said the study used data from Quadrant Information Services and controlled for 157 characteristics representative of a typical homeowner. Insurance quotes were generated for three distinct credit score levels: low (approximately a 630 FICO score), medium (approximately a 740 FICO score), and high (approximately an 820 FICO score). The dataset covered roughly 57% of the homeowners insurance market.

DeLong said consumers with low credit scores face a significant financial penalty, paying nearly $2,000 more annually for homeowners insurance. DeLong said this is an increase of 99% over those with high credit scores.

DeLong said consumers with medium credit scores pay, on average, $792 more per year (39% higher), when all other factors are held constant. DeLong said the higher premiums contribute to the number of uninsured homeowners.

DeLong said the impact of credit scores varies by state and said California, Maryland, and Massachusetts are the only states that prohibit the use of credit scores in determining homeowners insurance premiums. In most other states, DeLong said the use of credit scores can increase the cost of homeowners insurance from 40% to 150%. DeLong said the analysis reflects that having poor credit is, on average, more costly than living in a high disaster risk area. The data indicated that a low credit score homeowner in a safe region pays as much for insurance as a high credit homeowner in an area prone to disasters. DeLong said this indicates that homeowners with low credit scores are effectively subsidizing those with high credit scores in riskier locations.

DeLong said the reliance on credit scores in insurance pricing disproportionately affects African Americans, Latino Americans, and younger homeowners. DeLong said historical and ongoing discrimination has led to lower-than-average credit scores among these groups, which further limits their access to homeownership and wealth-building opportunities.

DeLong recommended all states prohibit the use of credit scores in homeowners insurance pricing. Additional recommendations include adopting a Homeowners Insurance Bill of Rights to enhance transparency and consumer protection and mandating public disclosure of insurer pricing models, including data on denied quotes and coverage.

Director Nelson raised concerns regarding the accuracy of the report, which indicated a low credit score increases premiums by $2,403. Director Nelson said this amount exceeds Missouri's average statewide premium of $2,050. Additionally, Director Nelson questioned the consistency of the medium credit penalty, listed as $1,038, in comparison to the statewide average premium. Director Nelson referenced data from ZIP code 63107, an area recently affected by tornadoes, highlighting a 73% uninsured rate and an average premium of $723.16. Director Nelson encouraged states to conduct their own investigations into the impact of credit scores on homeowners insurance and educate consumers about how credit scores affect their insurance costs.

6. <u>Heard a Presentation from the AKF, DREDF, NAMI, and RIPIN Titled “Health Consumer Protection Priorities During Uncharted Times”</u>

Jennifer Snow (National Alliance on Mental Illness—NAMI) said her organization is hearing from consumers who are struggling to afford health insurance and access to health care. She said a recent NAMI survey found that one in five people report poor mental health, with top reasons being uncertainty about the future, financial worries, and health concerns. Snow said consumers are facing high premiums, with one consumer indicating that insurance for a family costs almost as much as their mortgage, and another consumer indicating they cashed in a life insurance policy to pay more than $1,000 a month for medications. Snow said barriers like prior authorization, limited provider networks, and limits on covered services make it hard for people to use their insurance.

Shamus Durac (Rhode Island Parent Information Network—RIPIN) said RIPIN operates the state’s health insurance consumer assistance program and that RIPIN is receiving calls from consumes who are confused by recent federal changes, including the expiration of enhanced premium tax credits. Durac said Medicaid unwinding after the COVID-19 emergency is a useful analogy for what is happening in the marketplace today. Durac said that when extended Medicaid ended, millions of consumers lost coverage and were confused about the changes. Durac said consumers are facing similar issues now. Durac said consumers are experiencing higher premiums, dropping out of coverage, or buying non-Affordable Care Act (ACA)-compliant products without realizing the risks. Durac said consumers who lose coverage may face high bills, switch to plans with higher deductibles, or buy limited benefit products that do not cover pre-conditions without always understanding the differences.

Silvia Yee (Disability Rights Education and Defense Fund—DREDF) said everyone has health care needs, especially people with disabilities. Yee said changes in federal advisory recommendations, like the Advisory Committee on Immunization Practices (ACIP), could create gaps in vaccine and preventive care coverage. Yee said this is of particular concern for people with chronic conditions or disabilities who may not be able to take certain vaccines or must rely on vaccinated caregivers. Yee said states should consider expanding immunization authorizations beyond ACIP, expand who can administer vaccines, and ensure nondiscriminatory benefit design.

Deborah Darcy (American Kidney Fund—AKF) provided some options for states to mitigate coverage losses, including codifying ACA protections, such as zero-cost preventive services, dependent coverage to age 26, and prohibitions on gender rating. Darcy said states can use health insurance assessments, general revenues, tobacco taxes, and user fees to fund subsidies. Darcy said Colorado created a $100 million fund to reduce premiums, which successfully encouraged insurers to return to the market. Darcy said states can also simplify enrollment processes, use data to target outreach, use prepopulated applications, and conduct audits to identify and reduce administrative barriers. Darcy emphasized the importance of educating consumers about the risks associated with non-ACA-compliant insurance products and suggested that states consider adopting standardized benefit designs and updating guaranteed issue protections to further safeguard consumers.

Commissioner Lara described California's initiatives to preserve access to preventative care, especially vaccinations, in response to federal policy changes that have reduced such access. Commissioner Lara cited legislation requiring insurers to adhere to Department of Public Health guidelines, ensuring coverage of preventative services without cost sharing. Lara said federal rules from the Department of Health and Human Services (HHS) conflict with antidiscrimination protections, particularly impacting the LGBTQ+ community. Commissioner Lara said states may need to serve as "safe havens" for vulnerable communities, similar to the role some states play regarding abortion care. Commissioner Lara acknowledged the efforts of states like California in safeguarding rights and maintaining access to affordable, quality care, but he emphasized that federal developments are undermining these achievements.

Commissioner Conway said there is a shortage of mental health providers in Colorado, noting that Colorado has attempted to streamline credentialing requirements as a strategy to address this issue. Conway said he is interested in learning from successful approaches implemented in other states and continued efforts aimed at improving access to mental health providers and advancing consumer protections.

7. Heard a Presentation on How Flawed Death Records Make It Difficult to Locate Beneficiaries of Unclaimed Benefits

Richard M. Weber (Life Insurance Consumer Advocacy Center—LILAC) said there are significant challenges in the process of identifying beneficiaries for unclaimed life insurance benefits. Weber said that only 16% of U.S. deaths are recorded in the federal Death Master File (DMF), a database that insurers rely upon to determine whether a policyholder has passed away. Weber discussed the origins of the DMF, explaining that the database was initially developed to prevent improper Social Security payments. Over time, Weber said privacy concerns led to significant reductions in the database's completeness. Weber said 95% of U.S. deaths were reported to the database in 2010 to just 16% of U.S. deaths today. Weber said this limited reporting puts millions of families at risk of experiencing delays or even losing access to benefits that are rightfully theirs.

Weber said the NAIC Life Insurance Policy Locator (LIPL) is a valuable tool designed to help families locate benefits, particularly when they lack sufficient information to file a claim. However, Weber said the NAIC service has several limitations. Weber said insurers do not consistently promote the LIPL to consumers. Weber said the LPL does not contain a comprehensive database of all life insurance policies and depends on consumers to initiate requests. As a result of these limitations, Weber said many beneficiaries remain unaware of the existence of policies or how to access the LIPL.

Weber recommended that the NAIC promote enhanced data collection and implement more rigorous standards to ensure that beneficiaries can be located and receive the benefits to which they are entitled. Weber said there are trillions of dollars in life insurance and retirement benefits at stake.

Having no further business, the NAIC/Consumer Liaison Committee adjourned.

SharePoint/NAIC Support Staff Hub/Committees/Committee Folders/CONSUMER CMTE/2025/Cons Liaison/2025 Fall/Cons Liaison Min 12.8.25.docx

Draft: 12/2/25

NAIC/Consumer Liaison Committee
E-Vote
November 14, 2025

The NAIC/Consumer Liaison Committee conducted an e-vote that concluded Nov. 14, 2025. The following Committee members participated: Grace Arnold, Chair (MN); D.J. Bettencourt, Vice Chair (NH); Heather Carpenter (AK); Mark Fowler (AL); Ricardo Lara represented by Lucy Jabourian (CA); Andrew N. Mais represented by Kurt Swan (CT); Karima M. Woods represented by Sharon Shipp (DC); Michael Yaworsky represented by Sheryl Parker (FL); Scott Saiki (HI); Dean L. Cameron (ID); Ann Gillespie (IL); Marie Grant (MD); Anita G. Fox represented by Renee Campbell (MI); Angela L. Nelson represented by Jeana Thomas (MO); Mike Chaney represented by Ryan Blakeney (MS); Mike Causey represented by Angela Hatchell (NC); Jon Godfread represented by John Arnold (ND); Justin Zimmerman (NJ); Alice T. Kane represented by Margaret Pena (NM); Ned Gaines (NV); Kaitlin Asrow represented by Robert Kasinow (NY); Glen Mulready represented by Donna Dorr (OK); Michael Humphreys (PA); Cassie Brown represented by Randall Evans (TX); Scott A. White represented by Zuhairah Tillinghast (VA); Patty Kuderer represented by Andrew Davis (WA); Nathan Houdek represented by Sarah Smith (WI); and Allan L. McVey (WV).

1. Adopted Reaffirmation of the Committee's Mission Statement for 2026

The Committee conducted an e-vote to reaffirm the Committee's mission statement for 2026.

The mission of the NAIC/Consumer Liaison Committee is to assist the NAIC in its mission to support state insurance regulation by providing consumer views on insurance regulatory issues. The Liaison Committee provides a forum for ongoing dialogue between NAIC members and NAIC consumer representatives. The Liaison Committee's activities in 2026 are closely aligned with the priorities of the NAIC/Consumer Participation Board of Trustees.

A majority of the Committee members voted in favor of reaffirming its mission statement. The motion passed.

Having no further business, the NAIC/Consumer Liaison Committee adjourned.

NAIC/American Indian and Alaska Native Liaison Committee
E-Vote
November 26, 2025

The NAIC/American Indian and Alaska Native Liaison Committee conducted an e-vote that concluded Nov. 26, 2025. The following Liaison Committee members participated: Jeff Rude, Chair (WY); Glen Mulready, Vice Chair (OK); Heather Carpenter (AK); Trinidad Navarro represented by Christina Miller (DE); Dean L. Cameron represented by Shannon Hohl (ID); Remedio C. Mafnas (MP); James E. Brown (MT); Jon Godfread represented by John Arnold (ND); Ned Gaines (NV); TK Keen (OR); Larry D. Deiter represented by Frank Marnell (SD); and Jon Pike (UT).

1. Reaffirmed its Mission Statement for 2026

The Committee conducted an e-vote to reaffirm its mission statement for 2026.

The mission of the NAIC/American Indian and Alaska Native Liaison Committee is to provide a forum for ongoing dialogue between NAIC Members and the American Indian and Alaska Native communities concerning insurance issues of common interest. Specifically, the Liaison Committee will provide a forum for an exchange of information and views on issues surrounding the availability of insurance for American Indian and Alaska Native consumers and tribal interests, an opportunity for American Indian and Alaska Native groups to bring insurance consumer protection issues to the attention of NAIC Members, and a dialogue on best practices for dealing with insurance issues unique to sovereign tribal nations.

A majority of the Committee members voted in favor of reaffirming its mission statement. The motion passed.

Having no further business, the NAIC/American Indian and Alaska Native Liaison Committee adjourned.

