Draft date: 11/10/26

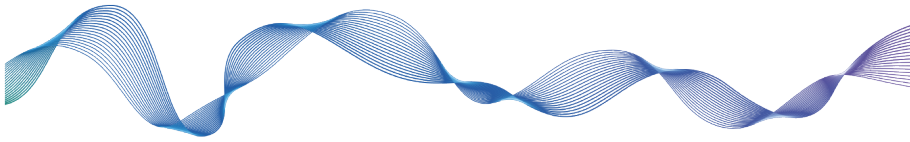
2026 Fall National Meeting
Dallas, Texas

JOINT MEETING OF THE HOMEOWNERS MARKET DATA CALL (C) TASK FORCE AND THE HOMEOWNERS MARKET REPORT (C) WORKING GROUP
Monday, November 16, 2026
4:00 – 5:00 p.m.
Convention Center—Grapevine CD—Level 3

ROLL CALL

HOMEOWNERS MARKET DATA CALL (C) TASK FORCE

NAIC Member	Representative	State/Territory
Michael Yaworsky, Chair	Michael Yaworsky	Florida
John F. King, Vice Chair	John F. King	Georgia
Mark Fowler	Dan Gates	Alabama
Peter M. Fuimaono	Elizabeth Perri	American Samoa
Charles Bassett	Tom Zuppan	Arizona
Jimmy Harris	Jimmy Harris	Arkansas
Ricardo Lara	Mike Peterson	California
Michael Conway	Michael Conway	Colorado
Joshua Hershman	George Bradner	Connecticut
Trinidad Navarro	Christina Miller	Delaware
Karima M. Woods	Angela King	District of Columbia
Scott Saiki	Jerry Bump	Hawaii
Dean L. Cameron	Shannon Hohl	Idaho
Ann Gillespie	Ann Gillespie	Illinois
Doug Ommen	Jared Kirby	Iowa
Timothy J. Temple	Adam Patrick	Louisiana
Sandra Darby	Sandra Darby	Maine
Marie Grant	Marie Grant	Maryland
Julia Dreier	Peter Brickwedde	Minnesota
Mike Chaney	Andy Case	Mississippi
Angela L. Nelson	Angela L. Nelson	Missouri
James E. Brown	Amber Thorvilson	Montana
Eric Dunning	Connie Van Slyke	Nebraska
Ned Gaines	Derick Dennis	Nevada
Susan Ochs	Susan Ochs	New Jersey
Jon Godfread	Blaine Bergstedt	North Dakota



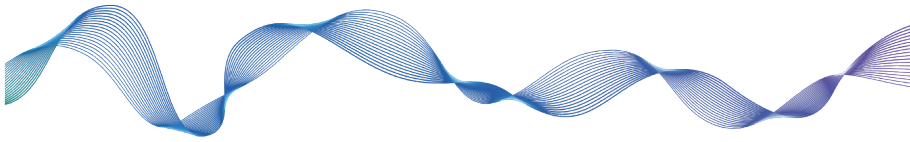
Remedio C. Mafnas	Charlette C. Borja	Northern Mariana Islands
Judith L. French	Stewart Trego	Ohio
Glen Mulready	Landon Hubbart	Oklahoma
TK Keen	Spencer Peacock	Oregon
Michael Humphreys	Michael Humphreys	Pennsylvania
Suzette M. Del Valle	Suzette M. Del Valle	Puerto Rico
Elizabeth Kelleher Dwyer	Matthew Gendron	Rhode Island
Michael Wise	Will Davis	South Carolina
Larry D. Deiter	Larry D. Deiter	South Dakota
Amanda Crawford	Mark Worman	Texas
Kaj Samsom	Rosemary Raszka	Vermont
Erin K. Hunter	Erin K. Hunter	West Virginia

NAIC Committee Support: Aaron Brandenburg

HOMEOWNERS MARKET REPORT (C) WORKING GROUP

Marie Grant, Chair/ Raymond A. Guzman, Chair	Maryland	Andy Case	Mississippi
		Eric Dunning	Nebraska
Angela L. Nelson, Vice Chair	Missouri	Sean Rosene	New Hampshire
Dan Gates	Alabama	Elouisa Tyler	New Mexico
Chad Bennett	Alaska	Alexander Vajda	New York
Lori Deaver Munn	Arizona	Blaine Bergstedt	North Dakota
Teri Ann Mecca	Arkansas	Stewart Trego	Ohio
Mike Peterson	California	Landon Hubbart	Oklahoma
Michael Conway/ Jason Lapham	Colorado	Spencer Peacock/ Cassie Soucy	Oregon
George Bradner	Connecticut	Michael McKenney	Pennsylvania
Angela King	District of Columbia	Elizabeth Kelleher Dwyer/ Matthew Gendron	Rhode Island
Nicole Crockett	Florida		
Emily Beets	Kansas	Rosemary Raszka	Vermont
Sanda Darby	Maine	Eric Lowe/ Zuhairah Tillinghast	Virginia
Matthew Mancini/ Jackie Horigan	Massachusetts		
		Simon Casson	Washington
Peter Brickwedde	Minnesota	Ellen Potter	West Virginia

NAIC Committee Support: Aaron Brandenburg/Libby Crews



AGENDA

1. Consider Adoption of the Task Force's Oct. 29, Oct. 14, and Summer National Meeting Minutes—*Commissioner Michael Yaworsky (FL)*	Attachments One, Two and Three
2. Consider Adoption of the Working Group's Oct. 16 Minutes —*Commissioner Marie Grant (MD)*	Attachment Four
3. Discuss Proposed Roadmap for the Homeowners Market Data Call Public Report— *Ray Guzman (MD) and Brad Gerling (MO)*	
4. Discuss Adding Surplus Lines Data for Future Homeowners Market Data Calls—*Commissioner Michael Yaworsky (FL)*	
5. Discuss Any Other Matters Brought Before the Task Force and Working Group—*Commissioner Michael Yaworsky (FL) and Commissioner Marie Grant (MD)*	
6. Adjournment	

Draft: 11/2/26

Homeowners Market Data Call (C) Task Force
E-Vote
October 29, 2026

The Homeowners Market Data Call (C) Task Force conducted an e-vote that concluded Oct. 29, 2026. The following Task Force members participated: Mark Fowler (AL); Charles Bassett represented by Tom Zuppan (AZ); Joshua Hershman represented by George Bradner (CT); Karima M. Woods represented by Jennifer Welch (DC);Scott Saiki represented by Jerry Bump (HI); Doug Ommen represented by Julie Mercer (IA); Dean L. Cameron represented by Shannon Hohl (ID); Timothy J. Temple (LA); Marie Grant (MD); Sandra Darby (ME); Peter Brickwedde (MN); James E. Brown (MT); TK Keen represented by Spencer Peacock (OR); Michael Humphreys represented by Michael McKenney (PA); and Michael Wise represented by Will Davis (SC).

1. Adopted its 2027 Charges

The Task Force conducted an e-vote to consider adoption of its 2027 Charges (Attachment X). The motion passed unanimously.

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

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Draft: 10/24/26

Homeowners Market Data Call (C) Task Force
Virtual Meeting
October 14, 2026

The Homeowners Market Data Call (C) Task Force met Oct. 14, 2026. The following Task Force members participated: Michael Yaworsky, Chair (FL); John F. King, Vice Chair, represented by Scott Sanders (GA); Charles Bassett represented by Tom Zuppan (AZ); Joshua Hershman represented by Wanchin Chou (CT); Karima M. Woods represented by Angela King (DC); Trinidad Navarro represented by Christina Miller (DE); Dean L. Cameron represented by Shannon Hohl (ID); Ann Gillespie represented by Julie Rachford (IL); Timothy J. Temple represented by Laura Gilmore (LA); Marie Grant (MD); Sandra Darby (ME); Julia Dreier represented by Peter Brickwedde (MN); Angela L. Nelson (MO); Jon Godfread represented by Blaine Bergstedt (ND); Eric Dunning represented by Connie Van Slyke (NE); Ned Gaines represented by Derick Dennis (NV); Glen Mulready (OK); TK Keen represented by Cassie Saucy (OR); Michael Humphreys represented by Michael McKenney (PA); Michael Wise represented by Will Davis (SC); Larry D. Deiter represented by Tony Dorschner (SD); Amanda Crawford represented by Nicole Elliott (TX); Kaj Samson represented by Zoie Y. Swaim (VT) and Erin K. Hunter represented by Ellen Potter (WV).

1. Received a Report from the Homeowners Market Report (C) Working Group

Commissioner Grant reported that the Homeowners Market Report (C) Working Group discussed potential data elements for a public report during its June 12 and Aug. 12 meetings and exposed proposed data elements for comment on Sept. 17. She said two comment letters were received and would be discussed during the Working Group's Oct. 16 meeting. Commissioner Grant said the goal of that meeting was to adopt the initial questions the public report would seek to answer and the initial data elements needed to answer those questions, recognizing that the elements could evolve as drafting progressed.

Commissioner Grant said a drafting group led by Ray Guzman (MD) and Brad Gerling (MO) was analyzing the data and developing a draft report. She anticipated that the Working Group would present a roadmap at the Fall National Meeting and expose drafts as work progressed, with a goal of completing the final report by the 2027 Spring National Meeting. She also invited insurance department staff interested in participating in the drafting work to contact NAIC committee support.

Michael DeLong (Consumer Federation of America—CFA) asked when drafts of the report would be available. Commissioner Grant said it was too early to know when a draft would be available, as the data is still being finalized.

2. Received a Status Update on the Homeowners Market Data Call Filings

Commissioner Yaworsky provided an update on Homeowners Market Data Call (HMDC) filings. He reported that following the July 15 filing deadline, NAIC committee support and regulators contacted more than 750 companies through mid-September with questions about submitted data. Approximately 450 companies had refiled, while many others provided explanations. Some companies were still working to refile data, and the dataset was expected to be considered final by the end of October. Commissioner Yaworsky said finalization of the dataset would allow the Homeowners Market Report (C) Working Group to use the data in its public report.

Jennifer Post (Erie Insurance) raised a technical issue with submitting a revised filing through the Regulatory Data Collection (RDC) system because the original files needed to be cleared before the revised filing could be uploaded. Libby Crews (NAIC) offered to coordinate deletion of the original files so the company could complete its refiling.

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3. Received a Memo from the Drafting Group on the Future of the Data Call

Acting Superintendent Darby presented the drafting group's memo on potential improvements to future versions of the HMDC. She explained that the recommendations were intended to improve data consistency and provide more actionable underwriting and exposure information. Recommendations included requiring reporting by all companies within an insurance group, expanding the collection to surplus lines writers, standardizing mitigation discount definitions and reporting methodology, and clarifying and expanding policy form definitions with explanatory language and examples.

Darby also described additional potential data elements for consideration, including dwelling square-footage ranges; data on dog-bite exclusions, including whether they are breed-specific; and catastrophe-loss data. She noted that additions would need to be balanced against reporting burden and consistency.

Commissioner Yaworsky discussed the increasing role of surplus lines in homeowners markets and the technical challenges associated with incorporating surplus lines information because the data may reside outside standard market data systems. DeLong strongly supported including surplus lines writers and suggested considering information on multifamily and commercial placements, given rising costs affecting multifamily housing owners. Erica Eversman (Automobile Education & Policy Institute—AEPI) said she supported including surplus lines information and cited coverage difficulties with older properties.

Bradner said Connecticut had successfully obtained data from surplus lines insurers and suggested tracking whether companies offer fortified roof endorsements that replace damaged roofs to fortified standards. Acting Superintendent Darby agreed the endorsement indicator was valuable, noted that it had not been included in the memo, and said it could be added to the Drafting Group's considerations.

Commissioner Yaworsky asked NAIC committee support to investigate ways surplus lines data could be included in the HMDC and to report back at the Fall National Meeting as this task force considers revisions for the next iteration of the HMDC.

4. Discussed its 2027 Proposed Charges

Commissioner Yaworsky presented the Task Force's 2027 proposed charges for initial discussion. He said the charges were posted and would be sent to Task Force members the following week for consideration, with adoption anticipated by the end of October.

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

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Draft Pending Adoption

Draft: 8/22/26

Homeowners Market Data Call (C) Task Force
and the Homeowners Market Report (C) Working Group
Columbus, Ohio
August 12, 2026

The Homeowners Market Data Call (C) Task Force met in Columbus, OH, Aug. 12, 2026, in joint session with the Homeowners Market Report C) Working Group. The following Task Force members participated: Michael Yaworsky, Chair, and Nicole Crockett (FL); John F. King, Vice Chair (GA); Mark Fowler (AL); Peter M. Fuimaono (AS); Charles Bassett represented by Lori Dreaver Munn and Tom Zuppan (AZ); Ricardo Lara represented by Mike Peterson (CA); Michael Conway (CO); Joshua Hershman represented by George Bradner and Wanchin Chou (CT); Trinidad Navarro represented by Christina Miller (DE); Scott Saiki represented by Lance Hirano (HI); Dean L. Cameron represented by Randy Pipal (ID); Timothy J. Temple represented by Ron Henderson (LA); Marie Grant (MD); Timothy M. Schott and Sandra Darby (ME); Peter Brickwedde and Phil Vigliaturo (MN); Mike Chaney represented by Andy Case (MS); Ned Gaines represented by Gennady Stolyarov II (NV); Judith L. French represented by Stewart Trego and Tom Botsko (OH); TK Keen represented by Cassie Soucy (OR); Michael Humphreys (PA); Suzette M. Del Valle (PR); Elizabeth Kelleher Dwyer represented by Matthew Gendron (RI); Michael Wise represented by Will Davis (SC); Larry D. Deiter represented by Tony Dorschner (SD); Amanda Crawford represented by Marianne Baker (TX); Kaj Samson represented by Rosemary Raszka (VT); and Erin K. Hunter represented by Robert Grishaber (WV). The following Working Group members participated: Marie Grant, Chair, and Jamie Sexton (MD); Angela L. Nelson, Vice Chair, (MO); Mark Fowler (AL); Lori Dreaver Munn and Tom Zuppan (AZ); Mike Peterson (CA); Michael Conway (CO); George Bradner and Wanchin Chou (CT); Craig Van Aalst (KS); Jackie Horigan (MA); Timothy M. Schott and Sandra Darby (ME); Peter Brickwedde and Phil Vigliaturo (MN); Andy Case (MS); Emily Doherty (NH); Stewart Trego and Tom Botsko (OH); Cassie Soucy (OR); Michael Humphreys (PA); Matthew Gendron (RI); Dan Bumpus and Zuhairah Tillinghast (VA); Rosemary Raszka (VT); and Robert Grishaber (WV).

1. Adopted the Task Force's Spring National Meeting Minutes

Commissioner Fowler made a motion, seconded by Director Nelson, to adopt the Task Force's Spring National Meeting minutes (*see NAIC Proceedings – Spring 2026, Homeowners Market Data Call (C) Task Force*). The motion passed unanimously.

The Task Force also met May 20 in regulator-to-regulator session, pursuant to paragraph 3 (specific companies, entities or individuals) of the NAIC Policy Statement on Open Meetings, to discuss and decide to extend the data call due date to July 15.

2. Adopted the Working Group's June 12 Minutes

Commissioner Grant said the Working Group met June 12 to receive feedback from interested parties regarding the homeowners data call data elements and related metrics for inclusion in a public report.

The Working Group also met July 27, May 27, and May 13 in regulator-to-regulator session, pursuant to paragraph 3 (specific companies, entities or individuals) of the NAIC Policy Statement on Open Meetings, to discuss the homeowners data call metrics and data.

Gendron made a motion, seconded by Director Nelson, to adopt the Working Group's June 12 minutes (Attachment One). The motion passed unanimously.

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3. Received an Update on the Status of the 2026 Homeowners Market Data Call

Commissioner Yaworsky said the due date for the data call was July 15. He said there were about 880 companies that met the $50,000 premium threshold and were not surplus lines or otherwise excluded from the data call, and over 700 insurers had passed the initial validation checks. He said reminders were sent to insurers that did not file data or failed initial validations.

Yaworsky said the NAIC, as well as individual states, are conducting some additional validation checks to improve the quality of the data. He said companies will receive questions about their submitted data.

Yaworsky said state insurance regulators have access to the data through the NAIC, are using the data for state-specific purposes, and are also working with the Homeowners Market Data Call Report (C) Working Group on a public report.

Yaworksy said the regulator drafting group, which has been validating and analyzing data, has also discussed how the data call might be improved in future years. He asked that group to provide the Task Force with any recommendations by mid-September, after which the Task Force will discuss and receive feedback from interested parties later in the year, in advance of next year's data call.

4. Heard a Presentation on the Homeowners Report

Jeff Czajkowski (Center for Insurance Policy and Research—CIPR) said the *Examining Homeowner Property Insurance Market Dynamics* report was released Aug. 5. He said one of the main conclusions was that the overall homeowners market remains robust. At the same time, market adjustments have transpired, and homeowners are starting to see higher premiums and higher rates of nonrenewals. He said the analysis shows why it is important not to treat trends in homeowners insurance as a single national problem with a single national answer. He said a more detailed, data-driven view helps state insurance regulators separate broad trends.

Czajkowski said the report analyzes data from about 715 companies that wrote at least $50,000 in homeowners premium from 2018 to 2024. He said the report analyzes six MCAS homeowners policy data fields, including the number of policies in force at the end of the period, the dollar amount of direct premium written during the period, the number of claims closed with payment during the period, the number of company-initiated non-renewals during the period, the number of company-initiated cancellations that occur after the effective date, and the number of cancellations for nonpayment. He said the data was supplemented with additional NAIC financial data and is presented at the NAIC zone level for confidentiality.

Czajkowski said that of the 715 companies included in the report, about 50% are operating within any zone. He said there has been a slight increase in the number of companies operating in each zone since 2018, or it has remained relatively flat. He said the report shows a significant and diverse mix of both regional and national carriers operating in each zone.

Czajkowski said the report shows homeowners insurance companies in the admitted market absorbed a growing number of policyholders. He said that although the number of policies is growing, more than half of the companies that consistently operate in each zone are writing fewer policies. He said the companies that are increasing the number of policies are taking on more than those that are decreasing them. He said the analysis does not account for companies operating within a group, and some of the policy decreases may be due to group dynamics.

Czajkowski said homeowners property insurance markets are exhibiting relatively strong signs of availability and affordability stress, especially from 2022 to 2024. He said adjusted for inflation, the average direct written

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premium has increased from 2018, ranging from 18% to 43% across the country, resulting in average premium increases of 2.4% to 5.3% per year. He said the report adjusts the premium each year to 2025 dollar values to account for inflation and rising costs in the economy. He said that since 2018, the ratio of company-initiated non-renewals per 1,000 policies-in-force has been increasing in all zones, anywhere from 96% to 216%, with rates between 11.7 and 25.1 per 1,000 policies-in-force in 2024. He said in comparison to cancellations for nonpayment, these nonrenewals are about 30% to 50% of those nonpayment cancellations.

Czajkowski said nuances to the aggregate market and loss data exist and need to be better understood. He said while the homeowners property insurance market cannot fully be understood at the zone, state, or national level, this zone-level property market data can help provide context for localized disruptions. He said the report looks at premium increase in relation to median home values within the states to get an effective rate of homeowners insurance. He said the effect rate decreases can be seen from 2018 to 2022 due to housing values increasing at a more rapid pace than homeowners insurance premiums.

Czajkowski said the homeowners insurance market is complex and comprehensive, and it is important to have different regulatory views of the data. He said the report points out that more granular ZIP code data would be helpful in analysis. He said this report, along with the forthcoming homeowners market data call (HMDC) analysis, provides critical insights to policymakers and regulators that support potential actions or decisions in their communities.

Stolyarov asked whether the zone data could be disaggregated to further analyze this information on a more granular level. Commissioner Grant said this report is a foundational understanding of homeowners markets, and the potential future HMDC report could provide information at a state level. Czajkowski said while the MCAS data is available at the state level, which state regulators can use for their own analysis, this report needed to be aggregated due to confidentiality. Commissioner Yaworsky said Florida has built its own MCAS database and would be happy to support other states in utilizing the MCAS data.

Henderson asked whether the report accounts for losses from catastrophic events or catastrophic-loss-related inflation over time. Czajkowski said the losses are soaked into the data, but the report does not specifically address catastrophic losses.

5. Discuss the Potential Scope of the Public Homeowners Market Data Call Report

Commissioner Grant said the Homeowners Market Report (C) Working Group received feedback from five interested parties during its June 12 meeting. She said there was general agreement on many of the data elements that consumers would want to see in a public report. She said consumer groups urged as granular a release as possible, and the industry stressed the need to provide context for any release of metrics.

Commissioner Grant said there is general support for releasing most data elements at a national and state level, over time, and by policy type. For some elements, context should be provided; for instance, releasing average premiums per $1,000 of Coverage A rather than just an average premium figure without context around the amount of insurance being purchased. She said the Working Group has also discussed which factors influence pricing and how to build that context in a metric, such as affordability, rather than releasing figures in the abstract.

Crockett said that on July 28, the Florida Office of Insurance Regulation (OIR) submitted comments to the Working Group on a national report framework. She said the recommendations center on ensuring the national report provides a clear and meaningful picture of homeowners insurance markets across the country. She said the OIR recommends organizing the data in two primary themes: availability and affordability. She said the data should not be viewed in isolation, as every state has a unique risk profile that significantly influences premiums and

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market conditions. She said the OIR recommends pairing key metrics with broader state-specific factors, such as catastrophe exposure, economic conditions, reinsurance costs, litigation environment, and market structure. Crockett said the OIR encourages the Working Group to use state-level data as the foundation of the national report while allowing states to leverage their more granular data for their own regulatory and policy purposes. She said the proposed affordability and availability metrics are intended to help identify important trends in premiums, coverage, consumer retention, and ensure appetite over time. She said the Working Group should consider other existing and forthcoming NAIC reports covering similar issues to avoid duplication and ensure consistency.

Brickwedde said he agreed with the idea of organizing around affordability and availability. He said it would be helpful to contextualize consumers' ability to afford insurance and use it, including the cost-sharing involved in filing a claim. He agreed that the Working Group should consider the work happening in other NAIC groups and publications to remain consistent.

Director Nelson suggested either defining the term "affordability" very carefully or using a different word when analyzing cost metrics in the report. Darby agreed with this point and said it was considered during the analysis period of the previous data call.

Soucy said some states may have data skewed by highly concentrated population centers, and there may need to be consideration of breaking the data down by counties with different population sizes to account for rural counties. Commissioner Grant said the current procedure for a public report is authorized at the state level.

Kenneth Klein (NAIC Consumer Representative) said the Working Group should consider the speed at which it releases the data, and that while offering context is important, it would slow down the release of data. Commissioner Yaworsky said when referring to contextualizing the data, the report is not looking to offer a preferred narrative of the data, but rather to ensure the data is framed in a way the public can understand. Director Nelson said the first iteration of a report on the data call may take longer as it is shaped, but future iterations will be easier and expedited.

Bradner said an example of this context is being able to inform the public about the importance of deductibles and their role in determining the portion of risk for any loss event.

Commissioner Grant said the next steps for the Working Group are to build a straw proposal of report metrics for interested parties to comment on. She said that proposal would be followed by a Working Group meeting in September.

Having no further business, the joint meeting of the Homeowners Market Data Call (C) Task Force and the Homeowners Market Report (C) Working Group adjourned.

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Draft: 10/24/26

Homeowners Market Report (C) Working Group
Virtual Meeting
October 16, 2026

The Homeowners Market Report (C) Working Group of the Homeowners Market Data Call (C) Task Force met Oct. 16, 2026. The following Working Group members participated: Marie Grant, Chair (MD); Angela L. Nelson, Vice Chair (MO); Erick Wright (AL); Teri Ann Mecca (AR); Michael Peterson (CA); Michael Conway (CO); George Bradner (CT); Tina Ching (DC); Rebecca Smid (FL); Caleb Huntington (MA); Sandra Darby (ME); Peter Brickwedde (MN); Blaine Bergstedt (ND); Sean Rosene (NH); Alexander Vajda (NY); Stewart Trego (OH); Shelly Scott (OK); Spencer Peacock (OR); Michael McKenney (PA); Matthew Gendon (RI); Eric Lowe (VA); Rosemary Raszka (VT); and Simon Casson (WA). Also participating was Nicole Elliott (TX).

1. Received Comments on Proposed Data Elements

Commissioner Grant said the Working Group received two comment letters on the proposed data elements that were exposed for comment from Sept. 17 through Oct. 9.

Erica Weyhenmeyer (National Association of Mutual Insurance Companies—NAMIC) asked that the report clearly define its methodology and cautioned that paid losses relative to reported premium should not be interpreted as a measure of profitability or rate adequacy. She also requested neutral framing of changes in coverage and deductibles and emphasized safeguards for confidential company information. Weyhenmeyer opposed the public release of underlying ZIP code-level data, whether raw or combined form, and recommended publication of aggregated and anonymized metrics.

Jonathan Misk, representing the office of U.S. Sen. Sheldon Whitehouse, urged the Working Group to consider releasing more granular data, including county- or ZIP code-level and year-by-year information, to allow users to identify localized trends in insurance availability, cost, and climate risk. He said that aggregated and anonymized data at those levels could protect company confidentiality and expressed concern that multi-year averages could obscure when and where trends occur.

Commissioner Grant explained that the report was structured as a state-by-state report and that states could choose to expand public reporting below the state level with their own approval. Director Nelson emphasized that decisions about granularity must reflect each state's laws and confidentiality obligations. Commissioner Grant noted that public release below the state level would require separate state-level approval.

2. Adopted Questions for the Public Report to Answer and Initial Data Elements

Aaron Brandenburg (NAIC) reviewed the proposed questions and initial data elements for the public report. He described measures addressing availability, including the number of companies, policies in force, new writers, nonrenewals, cancellations, and claims frequency and severity. He said proposed cost measures included average premium per $1,000 of coverage, losses paid by peril relative to direct written premium, deductible ranges, and changes between replacement cost and actual cash value coverage. He also reviewed measures of market competitiveness and concentration, including insurer counts, market concentration measures, leading writers and market share, premium variability, and residual market data. Proposed geographic and catastrophe-related measures would connect policies in force with third-party catastrophe models and Federal Emergency Management Agency (FEMA) risk information and examine per-peril claims and company entries and

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exits. Brandenburg said many dollar-based measures would be adjusted for inflation and that multi-year averages were proposed to reduce volatility.

Commissioner Grant explained that the questions and data elements would provide an initial roadmap rather than limit the Drafting Group from adding elements or considering different visualizations as analysis progressed.

Nicole Elliott (TX) asked that the Working Group consider interactive presentation formats, such as dashboards, rather than relying only on a static report. Commissioner Grant said the final format had not been determined and that the Drafting Group would consider dashboarding and other presentation options.

Commissioner Grant said the report Drafting Group would be co-chaired by Ray Guzman (MD) and Brad Gerling (MO) and the adopted questions and elements would serve as a starting point and could evolve as data and analysis developed.

Director Nelson made a motion, seconded by Commissioner Conway, to adopt the proposed questions and initial data elements (Attachment --). The motion passed unanimously.

Commissioner Grant said the Working Group expected to have a roadmap and report outline for the Fall National Meeting and was working toward a final public report by the 2027 Spring National Meeting. Commissioner Grant reiterated that the Working Group would continue developing the report through the Drafting Group and future public discussions as the analysis progressed.

Having no further business, the Homeowners Market Report (C) Working Group adjourned.

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4. Discuss Adding Surplus Lines Data for Future Homeowners Market Data Calls

Commissioner Michael Yaworsky (FL)

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

8

November 11, 2026

Commissioner Michael Yaworsky, Chair
Homeowners Market Data Call (C) Task Force
National Association of Insurance Commissioners

Commissioner Marie Grant, Chair
Homeowners Market Report (C) Working Group
National Association of Insurance Commissioners

Re: Proposed Enhancements to the Homeowners Market Data Call for the 2027 Data Collection – Inclusion of Surplus Lines Writers

Dear Commissioner Yaworsky, Commissioner Grant and members of the Homeowners Market Data Call (C) Task Force and Homeowners Market Report (C) Working Group:

The American Property and Casualty Insurance Association (APCIA), the National Association of Mutual Insurance Companies (NAMIC) and the Wholesale & Specialty Insurance Association (WSIA) ("Trades") would like to thank the Homeowners Market Data Call Drafting Group for its work on the October 13, 2026, memorandum, "Proposed Enhancements to the Homeowners Market Data Call for the 2027 Data Collection," and would like to thank the Task Force for the opportunity to comment. The surplus lines market plays an important role in providing insurance for hard-to-place, unique or high capacity (i.e., high limit) risks. Often called the "safety valve" of the insurance industry, surplus lines insurers fill the need for coverage in the marketplace by insuring those risks that are declined by the standard underwriting and pricing processes of admitted insurance carriers.

Although the number of homeowners seeking coverage in the surplus lines market has grown in recent years, homeowners lines still comprise a relatively small percentage of the surplus lines market. Over the past 10 years, surplus lines insurers' share of total homeowners premium written by property and casualty insurers rose from 0.9% in 2015 to 2.2% in 2025[1]. AM Best attributes this limited increase to changing climate conditions and population shifts to coastal and other areas that have been subjected to severe weather, resulting in loss experience for homeowners multiperil insurance being increasingly volatile.[2]

The memorandum recommends expanding the data collection to include surplus lines writers participating in the homeowners' market. The trades understand regulators' interest in a more complete picture of homeowners insurance availability, particularly because the surplus lines market has stepped in to provide coverage for certain risk profiles. The trades would like to help explore, in the short term and in the long term, what information is available from the surplus lines market and how it can be provided. Since surplus lines insurers operate under a different regulatory framework than admitted insurers, much of how they record their underwriting elements is conducted in a different manner.

[1] 2026 AM Best Market Segment Report on Surplus Lines page 19.
[2] Id.

Surplus lines policies are highly customizable and may contain different manuscript endorsements from risk to risk, meaning data may not be standardized even within the surplus lines book. Pricing, deductibles, and terms are set at the policy level and often reflect manuscript or proprietary forms rather than standard ISO-style forms (e.g., HO-3, HO-5, etc.). Historically, surplus lines homeowners business has not been recorded or systematized in the structure the current homeowners market data call (HMDC) requires.

The structure of some surplus lines programs differs from traditional admitted insurance operations. Depending on the program, policy, underwriting, and claims information may be maintained by the insurer and one or more program administrators or service providers. The insurer remains responsible for responding to requests from its domiciliary regulator, but assembling a new dataset may require coordination across these systems and organizations. Establishing clear reporting specifications and reasonable implementation periods will allow insurers to develop appropriate collection and validation processes and help ensure regulators receive reliable and comparable information.

Admitted and surplus lines businesses typically operate as separate legal and operational entities with distinct systems, processes, and data needs. For a surplus lines insurer, a data call that is structured similarly to an admitted market request may therefore require creation of an entirely new reporting operation, including systems for collecting data from internal operations, program administrators and other third parties, validating that information, and converting it into the required reporting format.

With these points in mind, the trades respectfully request the Task Force consider the following parameters and alternative measures. We believe they would provide data that meets regulatory objectives and allow surplus lines writers to respond to prospective data calls in a way that works for both regulators and the industry.

1. Jurisdiction and Authority

The authority to collect surplus lines data lies with the domestic regulator of a U.S. surplus lines insurer. This approach is consistent with the structure of surplus lines regulation, under which a nonadmitted insurer's solvency is overseen by its state of domicile and the placement of nonadmitted insurance is regulated by the insured's home state under the Nonadmitted and Reinsurance Reform Act of 2010 (NRRA), 15 U.S.C. § 8201 *et seq*. We appreciate that this was acknowledged on the Task Force's recent call and are hopeful that this is a good starting point for collecting the data. We respectfully ask the data call instructions and any accompanying regulatory correspondence state that surplus lines data shall be collected from the insurer's domiciliary regulator and the authority cited.

2. Timing and Prospective Application

Because of how surplus lines data is internally maintained, the trades recommend that the comprehensive reporting requirements for surplus lines insurers apply prospectively. Surplus lines carriers historically have not obtained the same level of information required for admitted-market statistical reporting.

The systems used to collect and disseminate 2027 data have largely already been built, which makes meaningful implementation changes to accommodate surplus lines writers impractical for the 2027 cycle. Surplus lines insurers likewise need lead time to identify where the requested data resides, build or modify the systems and processes needed to capture it, and coordinate with the wholesale brokers and underwriting managers. We ask the Task Force to consider the following prospective timeline:

2027: Agree on a reporting template and governance for surplus lines insurers.
2028: First year in which data is collected under the new framework.
2029: First year in which surplus lines data is reported.

The trades recognize that regulators may wish to have some information on surplus lines homeowners business before the full framework is in place. Should the Task Force pursue an interim approach for 2027, WSIA proposes to work together with the Task Force and/or Drafting Group to develop some targeted high-level data elements. WSIA is already consulting with our members on which elements could feasibly be reported for 2027 using their current system, with the goal of giving regulators a useful snapshot of surplus lines homeowners coverage.

3. Alien Surplus Lines Insurers

The parameters described above relate to U.S.-domiciled surplus lines insurers. Alien surplus lines insurers, which are domiciled outside the United States, have no U.S. domestic regulator and are approved through the NAIC International Insurers Department (IID). If the NAIC is seeking data from alien surplus lines insurers, the IID framework should be used, and representatives of alien insurers, including Lloyd's and the International Underwriting Association (IUA), should be consulted before requirements are established.

4. Data Elements

Even if the data is requested through appropriate jurisdictions (domestic regulators and IID) and appropriate lead time is provided, specific fields in the current HMDC template for admitted insurers may be difficult to record or may simply not be applicable to surplus lines policies. The trades are working with its members to sort the HMDC elements into four groups: those that can be reported today, those that could be reported prospectively with adequate lead time, those that may prove inapplicable in the context of a surplus lines policy, and those that might be impossible to report even with adequate lead time. The trades will provide detailed feedback to the Task Force and asks the Task Force to consider which HMDC elements would be most useful and practical for regulatory purposes in a surplus lines context.

5. Additional Considerations

Group reporting. The memorandum also recommends reporting by all companies within an insurance group. We ask the Task Force to clarify that this recommendation does not extend to affiliated surplus lines insurers before a surplus lines reporting framework is adopted, so that the group reporting requirement does not inadvertently bring surplus lines insurers into the 2027 collection.

Existing data sources. We encourage the Task Force to consider whether existing sources could meet a portion of regulators' informational needs and reduce duplicative reporting. The trades would be happy to provide additional information and resources to that effect.

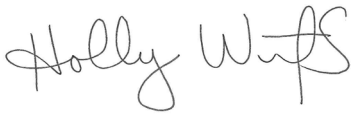
Context for analysis. The surplus lines market provides coverage for risks the admitted market is unable or unwilling to write and operates with freedom of rate and form. As a result, metrics such as state-required mitigation discounts, policy form classifications, and cancellation and nonrenewal practices may not be directly comparable to admitted-market data. The trades suggest that surplus lines data be reported and analyzed separately from admitted data so that it supports an accurate understanding of the homeowners market.

APCIA, NAMIC and WSIA would again like to thank the Drafting Group and the Task Force for their work to improve the Homeowners Market Data Call. The trades ask for the opportunity and time to work with our surplus lines carrier members to propose reporting mechanisms and data elements that will allow them to respond to a data call. The trades wish to collaborate with the regulators and NAIC staff and is ready to meet to begin these important discussions. Thank you for the opportunity to comment, and please let us know if you have any questions.

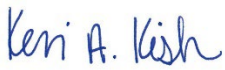
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