United Policyholders
Empowering the Insured

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November 6, 2025

Karen Winkel
Rules Coordinator
DCBS | Division of Financial Regulation
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RE: Insurance Premium IncreaseTransparency Notices Rulemaking Draft (pursuant to HB 2563)

Dear Ms. Winkel,

United Policyholders strongly supported HB 2563 and appreciates the opportunity to comment on the draft of the regulations that will implement the new law.

The current revised Definitions section states as follows:

836-XXX-XXX2 Definitions

HB 2563 (2025) SECTION 2. (3) states a clear and reasonable written explanation of a premium increase from an insurer must include all, but not more than four, of the factors that most significantly contributed to the premium increase. The Department of Consumer and Business Services defines this requirement to mean an insurer responding to a written request from an insured regarding a premium increase at renewal shall:

Following this section, the current revised subsections (a) and (b) of 836-XXX-XXX2 define this requirement to mean an insurer responding to a written request from an insured regarding a premium increase at renewal shall:

a. Provide not fewer than one factor that significantly contributed to the premium increase, as defined in subsection (2) of this section.

b. Provide information about as many as three additional factors that significantly contributed to the premium increase, as defined in subsection (2) of this section.

For clarity, we believe subsections (a) and (b) of 836-XXX-XXX2 should be amended as follows:

Current language:

a. Provide not fewer than the one factor that significantly contributed to the premium increase, as defined in subsection (2) of this section.

Suggested language:

a. Provide the specific factor that most significantly contributed to the premium increase as defined in subsection (2) of this section.

Current language (first sentence):

b. Provide information about as many as three additional factors that significantly contributed to the premium increase, as defined in subsection (2) of this section.

Suggested language (first sentence):

b. Provide information about no less than three additional factors, for a total of four, if applicable, that contributed to the premium increase.

836-XXX-XXX4

Periodic data reporting

This section does not distinguish between the premium increases that result from rate increases as opposed to premium increases resulting from increased coverage limits that are commonly applied on annual basis to all homeowner/property policies due to construction cost inflation. It is also common for automobile premiums to be impacted by changes in miles driven, changes in insured drivers, and changes in vehicles.

If the purpose of the reporting is to obtain meaningful information indicating the impact or effectiveness of this statute by measuring the number of inquiries as compared to the number of renewals with increased premiums, we believe the language should be clarified to require the insurer to report the number of policyholders who received a rate increase greater than 2% and the number of those policyholders who subsequently inquired about the cause of that increase.

Sincerely,

Joel Laucher, Program Specialist