



Roadmap to Recovery™  
Advocacy and Action  
Roadmap to Preparedness

December 3, 2025

Karen Winkel  
Rules Coordinator  
DCBS | Division of Financial Regulation  
[Karen.J.Winkel@dcbs.oregon.gov](mailto:Karen.J.Winkel@dcbs.oregon.gov) |

RE: Insurance Premium Increase Transparency Notices Rulemaking Draft (pursuant to HB 2563)

Dear Ms. Winkel,

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

Our first recommended edits address the language in the policyholder notification and are intended to provide a more logically ordered response using the existing language and additional language that more specifically details what information is being provided to the consumer (our recommended additional language is underlined).

Our second recommended edit pertains to the requirements for insurer periodic data reporting. Our suggestion is intended to more meaningfully identify the population of insureds that sought details regarding a rate increase as opposed to identifying the population of insureds that received a premium increase since virtually every insured homeowner receives a premium increase each year due to an inflation factor applied to the dwelling limits because of increased construction costs. Again, our recommended additional language is underlined:

First edits:

Policyholder Name, Policy Type, Policy Number, Policy Period, and Effective Date.

- Your premium increased at renewal and you inquired about the reason(s) that led to that increase.
- In response to your request, we are providing information regarding the factor(s) that contributed most significantly to the premium increase for the above captioned policy at renewal.

[www.uphelp.org](http://www.uphelp.org) [info@uphelp.org](mailto:info@uphelp.org)

*United Policyholders is a nonprofit 501(c) (3) organization, Tax ID 94-3162024.*

- The following is an explanation for the most impactful cause/each of the most impactful causes of your premium increase (insurers shall provide a clear and reasonable written explanation for up to the top four factors that significantly contributed to the premium increase along with a corresponding explanation).

- If you have any questions, please contact your insurance company/insurance producer via telephone ( ), email ( ), postal mail ( ), or visit your website ( ).

Second recommended edit:

### 836-054-0125 Periodic data reporting

(1) HB 2563 (2025) SECTION 2. (8) states, in part, “the department shall adopt rules to implement the requirements of this section, including but not limited to rules requiring periodic data reporting from insurers that issue qualified policies to evaluate the impact of the required notices...”

(2) This rule applies to insurers that offer qualified policies as defined in SECTION 2. (1) of House Bill 2563 E (2025), and the combined written premium of the qualifying lines is \$1,000,000 or greater for the calendar year being reported.

(3) Each insurer meeting the premium threshold indicated in section (2) must report to the Department of Financial Regulation (DFR) no later than April 30th, 2028, and every other year thereafter, the following information grouped by zip code:

- a. The total number of qualified policies as defined in SECTION 2. (1) of House Bill 2563 E (2025), where a policy renewal offer was made during the reporting calendar year where the renewal term premium was greater than the prior term premium.
- b. The total number of qualified policies where the premium increased from the group a. above for reasons other than an increase in the coverage amounts, that submitted a written request for an explanation for the premium increase.
- c. The percentage the premium increased for each policyholder from group b. above that submitted a written request for an explanation for the premium increase.
- d. Any other data DCBS determines necessary.

(4) Impacted insurers shall submit report information from the previous calendar year in a form and manner prescribed by the DFR set forth in the department’s website.

Respectfully submitted,

Joel Laucher, Program Specialist  
United Policyholders