

From: [Noah Davis](#)
To: [OIC Rules Coordinator](#)
Subject: RE: CR-102 (R 2021-07) Temporarily prohibiting the use of credit history on some personal lines proposed rule posted proposed rule posted
Date: Wednesday, October 6, 2021 1:13:00 PM

External Email

I write with respect to “**Temporarily prohibiting the use of credit history on some personal lines(R 2021-07)**”

As a result of this rule, my insurance carrier called me about a month+ ago to let me know of the rule change and then, as a result, my rates went up approximately \$60 a month.

The OIC already takes away the ability of insurers to be competitive (by preventing a whole host of special offers), and requiring that their rates be posted public and approved by the commissioner and that discounts be heavily regulated.

Now, with rates increasing across the board, the OIC is making insurance even more unaffordable.

IF the idea of the rule was to subsidize those with bad credit (despite the insurance agency having data to support their position that bad credit correlates to more or higher value claims), why penalize persons of limited means who have good credit? You know that a lot of the high end credit scores occur among a population that is 75 and older? Many in that populations have fixed income. So, instead of an “access to insurance issue (and lowering premiums across the board)” this rule has the unintended effect of increasing the cost of insurance to the detriment of tens of thousands if not hundreds of thousands of Washingtonians, from retired individuals to persons of limited means (despite their good credit).

Noah Davis | IN PACTA PLLC
☎ 206.709.8281 | F 206.860.0178
☎ 206.734.3753 (Direct)
✉ nd@inpacta.com | www.inpacta.com
33530 1st Way S. Suite 102
Federal Way WA 98003

From: WA OIC [<mailto:insurance.wa@public.govdelivery.com>]
Sent: Wednesday, October 06, 2021 11:01 AM
To: nd@inpacta.com
Subject: CR-102 (R 2021-07) Temporarily prohibiting the use of credit history on some personal lines proposed rule posted proposed rule posted

Office of the Insurance Commissioner



Temporarily prohibiting the use of credit history on some personal lines(R 2021-07) proposed rule posted

Thanks for your interest in rulemaking from the Washington State Office of the Insurance Commissioner.

We have released the proposed rule language on R 2021-07 to temporarily prohibit the use of credit history to determine premiums and eligibility for coverage in private automobile and homeowners, including renters, insurance for three years after the public emergency concludes.

We scheduled a public hearing on the rule:

- When: November 23 9:30 a.m.
- Where: [Register for the public hearing via zoom](#)

Comments on the proposed rule language are due November 22, 2021; please send them to rulescoordinator@oic.wa.gov.

For more information, including the proposed rule language (CR-102), please visit the rule's [webpage](#).

If you've received this message, you do not need to sign up for any other notice to receive updates on this rule.



Questions? [Contact us](#)

STAY CONNECTED:



SUBSCRIBER SERVICES:

[Manage Subscriptions](#) | [Unsubscribe All](#) | [Subscriber Help](#) |

This email was sent to nd@inpacta.com using GovDelivery Communications Cloud on behalf of: Washington State Office of the Insurance Commissioner · PO Box 40255, Olympia WA 98504-0255

