

# INSTRUCTIONS FOR COMPLETING THE RESIDENTIAL NONRENEWAL & CANCELLATION DATACALL

# Reporting year 2024 (Experience years 2021, 2022, 2023)

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## INSTRUCTIONS FOR COMPLETING THE RESIDENTIAL NONRENEWAL AND CANCELLATION DATACALL

Pursuant to <u>RCW 48.02.060</u> and <u>48.02.065</u>, the Office of the Insurance Commissioner (OIC) directs completion of the Washington residential nonrenewal and cancellation datacall (hereinafter datacall). The purpose of this datacall is to collect basic quantitative and qualitative information on residential property policies in Washington.

Please submit both the <u>completed excel workbook AND the online survey</u> portions of the datacall. Both the excel workbook and the online survey must be submitted by <mark>September 26<sup>th</sup> at 5pm PST.</mark>

## **Reporting Threshold**

Companies <u>with combined total written premiums of \$1 million or greater</u> for Annual Statement Lines of Business 01 (Personal Fire) and 04 (Homeowners) in *either* 2021, 2022, or 2023, are directed to complete and submit this datacall for all experience years and additionally complete the survey.

For example, if 2021 Line 1 total written premium was \$400,000 and Line 4 was \$600,000, a report must be submitted for all experience years (2021, 2022, and 2023), <u>even if the combined 2021 or 2023 total written premiums were below the \$1 million threshold.</u>

## Scope

For this datacall, a policy of residential property insurance shall include dwelling and homeowner policies, except that it shall NOT include a tenant's policy, a renter's policy, or a policy insuring individually owned condominium units.

Except where specifically instructed otherwise, include the following residential property insurance policy forms: homeowners coverage forms similar to HO-2, HO-3, HO-5 & HO-8, etc., dwelling-fire/landlord protection coverage forms (excluding dwelling fire content only coverage) for residential structures of 4 units or less (e.g., DP-1, DP-2, DP-3), and mobile/manufactured homes coverage forms (e.g., HO-7); EXCLUDE Renters (e.g., HO-4) and Condo (e.g., HO-6) type policy forms.

## **Individual Submission**

The OIC will only accept individual company submissions. **No group submissions** are allowed. The data must be submitted by each **INDIVIDUAL company**.

## Confidentiality

Under <u>RCW 48.02.065(8)</u>, all data submitted as a part of this datacall are confidential by law and privileged and not subject to public disclosure under chapter <u>RCW 42.56</u>. The Commissioner may prepare and publish reports, analysis, or other documents using the data received from individual property and casualty companies so long as the data in the report is in the aggregate form and does not permit the identification of information related to individual companies. Any data in aggregate and anonymized forms are deemed open records available for public inspection.

## Communication

#### **General Questions:**

David Forte Senior Policy Advisor, Property & Casualty 360-725-7268 <u>datacall@oic.wa.gov</u>

## **Survey Submissions**

The purpose of the survey component of this datacall is to better understand which wildfire risk tools companies are using to determine wildfire risk and how they are used. Please complete the survey linked below by **September 26th at 5pm PST**.

#### Survey Link: https://washingtoninsurance.sjc1.gualtrics.com/jfe/form/SV\_3HRFzeK8tDdDybI

A PDF copy of the survey was sent with the worksheet template so you may review the questions and gather your answers prior to beginning the online survey. The link above will allow respondents to exit the survey and re-enter to finish later. Incomplete responses will be automatically submitted 1 week after the deadline has passed. The survey will only be available up until the submission deadline.

#### **Survey questions**

There are four sections to the survey. The first section contains questions about underwriting eligibility criteria related to wildfire exposure for new and existing policyholders. The second section contains questions about changes in underwriting locations due to wildfire risk. The third section contains questions about the wildfire tools used to assist underwriting decisions, and the fourth and final section has questions asking about any underwriting thresholds based on those tools described in the previous section.

#### Section 1: Changes to Wildfire Underwriting Eligibility Requirements

- 1. Has your company made any recent changes in underwriting eligibility requirements for new or existing policies, in relation to wildfire exposure in 2021, 2022, or 2023? If so, provide the date of last implementation. (Yes/No and Provide Date)
- 2. If you responded "Yes" to Question 1, describe the changes in eligibility requirements. (Free Response)

#### Section 2: Changes to wildfire Underwriting Locations

- 3. For new business: Are there locations where you are no longer writing business (changes from 2021 2023)? (Yes/No)
- 4. For new business: If there are locations where you are no long writing business, what ZIP codes are those locations in? Please select all that apply. (Select ZIP codes that apply)
- 5. For renewals: Are there locations where you are no longer renewing policies (changes from 2021 2023)? (Yes/No)
- 6. For renewals: If there are locations where you are no longer renewing policies, what ZIP codes are those locations in? Please select all that apply. (Select ZIP codes that apply)

#### Section 3: Wildfire Risk Tools

- 7. What database or other tool does your company primarily utilize to determine wildfire risk as of December 31, 2023 (Select One)
  - Fireline Score (Verisk)
  - CoreLogic Wildfire Risk Score (CoreLogic)
  - Zesty.ai
  - RMS (Moody's)
  - WSRB Protection Class (PC)
  - Building Code Effectiveness Grading Schedule (BCEGS)
  - Your company's internal/proprietary data (Please Explain)
  - Other data source/no model used (Please Explain)
- 8. Does your company use ANY of the following products for underwriting tools? (Check all that apply)
  - Fireline Score (Verisk)
  - CoreLogic Wildfire Risk Score (CoreLogic)
  - Zesty.ai
  - RMS (Moody's)
  - WSRB Protection Class (PC)

- Building Code Effectiveness Grading Schedule (BCEGS)
- Your company's internal/proprietary data
- Other data source/no model used (Please Explain)

#### Section 4: Wildfire Risk Scores

- 9. If you selected Fireline Score (Verisk), please provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for new and existing policies. (Number between 0-30)
- 10. If you selected CoreLogic Wildfire Risk Score (CoreLogic), please provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for new and existing policies. (Number between 1-100)
- 11. If you selected Zesty.ai, provide the highest Level 1 and Level 2 combination a dwelling can have and still be eligible for coverage, for both new and existing policies. (Numbers between 1-10)
- 12. If you selected RMS (Moody's), provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for both new and existing policies. (Number between 1-10)
- If you selected WSRB Protection Class (PC), provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for both new and existing policies. (Number between 1-10)
- 14. If you selected Building Code Effectiveness Grading Schedule (BCEGS), provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for both new and existing policies. (Number between 1-10)
- 15. If you selected internal/proprietary data or other in Question 4, provide the highest level of fire risk a dwelling can have and still be eligible for coverage, for both new and existing policies. (Select One)
  - A. Negligible/Low
  - B. Moderate
  - C. High
  - D. Very High/Extreme
- 16. Describe any exceptions to the above selected scores/level of risk. (Free Response)
- 17. Provide any additional comments or explanations about the selected wildfire model and/or risk scores. (Free Response)

#### Section 5: Nonrenewal and Cancellation Reasons

18. Please select any additional reasons [other than reasons provided in the Excel Workbook] your company internally tracks nonrenewals and cancellations on residential policies.

## Worksheets in Transmittal Workbook

There are seven worksheets in the transmittal workbook for the datacall:

- 1. <u>CompanyInfo</u>
- 2. <u>PolicyTypes</u>
- 3. <u>PolicyCounts</u>
- 4. Nonrenewals
- 5. <u>Cancellations</u>
- 6. <u>Reconcilliation</u>
- 7. Explanations

#### **CompanyInfo Worksheet**

There are 15 questions to answer in the "CompanyInfo" worksheet.

- 1. Enter your company's 5-digit NAIC Code. (Fill in the Blank)
- 2. Enter your company's 4-digit NAIC Group Code. (Fill in the Blank)
- 3. Enter the company's name. (Fill in the Blank)
- 4. Enter the street number and name of the company's primary mailing address to be used for any surface mail between the company and the Department. (Fill in the Blank)
- 5. Enter the city of the company's primary mailing address. (Fill in the Blank)
- 6. Enter the 2-digit state abbreviation of the company's primary mailing address. (Fill in the Blank)
- 7. Enter the ZIP Code of the company's primary mailing address. (Fill in the Blank)
- 8. Enter the name of contact primarily responsible for answering questions related to this data call. (Fill in the Blank)
- 9. Enter the title of the primary contact. (Fill in the Blank)
- 10. Enter the phone number of the primary contact. (Fill in the Blank)
- 11. Enter the e-mail address of the primary contact. (Fill in the Blank)

### **PolicyTypes Worksheet**

The "PolicyTypes" worksheet contains one question about the types of policy forms written by the company at any time over all the experience years. Only consider policies with premiums reported under Annual Statement Line 01 (Fire) or Line 04 (Homeowners).

Select all that apply from the following list of policy forms:

• Dwelling-Fire (e.g., DP-1, DP-2, & DOP-3)

- Including Landlord Protection Policies insuring up to 4 residential dwelling units.
- Homeowners (e.g., HO-2, HO-3, HO-5 & HO-8)
- Tenants/Renters (e.g., HO-4)
  - Including rented mobile homes and condos.
- Condominium-Unit Owner (e.g., HO-6)
- Mobile/Manufactured Homes (e.g., HO-7)

Companies that write **only** <u>Tenants/Renters and/or Condominium Unit-Owner type policies</u> should save and submit the workbook without proceeding further.

Companies that write any other policy form(s) should continue to the next worksheet. If your company writes Tenants/Renters and/or Condominium Unit-Owner type policies in addition to any of the other policy forms, be sure to exclude the experience of Tenants/Renters and/or Condominium Unit-Owner type policies when completing the remainder of the workbook.

### **PolicyCounts Worksheet**

The "PolicyCounts" worksheet collects the total count of the new, renewed, non-renewed, and cancelled residential insurance policies that occurred in each Washington ZIP code during the calendar years (January 1 – December 31) in 2021, 2022, and 2023.

As further instructed below, combine the experience from following residential insurance policy forms: Homeowners coverage forms similar to HO-2, HO-3, HO-5 & HO-8, etc., Dwelling Fire/Landlord Protection coverage forms (excluding dwelling fire contents only coverage) for residential structures of 4 units or less (e.g., DP-1, DP-2, DP-3), and mobile/manufactured homes coverage forms (e.g., HO-7).

In Sections A – G, report the experience from policies where your company provided primary fire coverage. For each non-renewal or cancellation reported in each ZIP code, provide details on the associated "NonRenewals" or "Cancellations" worksheet.

If your group is renewing business into an associated company within the group, do not double count the policies as both renewed in the sister company, and non-renewed in the original company. Rather, only report the policy as renewed in the sister company, and do not report the policy as non-renewed in the original company for that experience year. Only if the consumer declined the offer to renew into the sister company should a policy be counted it as non-renewed in the original company, and not reported by the sister company.

If the company sold or otherwise transferred policies to an unaffiliated insurance company, do not report those policies as non-renewed or cancelled. In the <u>Explanations</u> worksheet, inform the OIC of the name and NAIC of the company that took ownership of the policies, the date when sale or transfer of ownership occurred, and the total number of policies that were sold or transferred. Likewise, any

company taking ownership of policies from an unaffiliated insurance company should not count those policies as new business, but instead report the counts as renewals. In the <u>Explanations</u> worksheet, inform the OIC of the name and NAIC of the company that sold or transferred the policies, the date when sale or transfer of ownership occurred, and the total number of policies that were renewed into the company.

If the green cell below the header turns red, one of the entries in that column does not meet the fields requirements. Click on the green/red cell to view the requirements.

#### Section A – Policy Totals

This section automatically tallies the total sum of the number of new, renewed, and nonrenewed/cancelled policies with fire coverage that occurred within each of the reported experience years. Make sure that the totals accurately reflect the experience reported in the worksheet.

#### Section B – ZIP Code

Report for all Washington ZIP codes where business is written, renewed, non-renewed, or cancelled. Valid Washington ZIP codes are from 98001 to 99403. We will accept 98000 for policies where a valid ZIP code cannot be obtained. If there are a large volume of invalid ZIP codes, use the <u>Explanations</u> worksheet to describe the issue.

#### Section C – Experience Year

Report experience from 2021, 2022 and 2023. This includes all policies that were written new, renewed, or non-renewed/cancelled during each of those years. Be sure to include any policies non-renewed or cancelled in 2021, even if the policy was originally written new or renewed prior to 2021.

Note: Companies with combined total written premiums of \$1 million or greater for Annual Statement Lines of Business 01 (Personal Fire) and 04 (Homeowners) in either 2021, 2022, or 2023 are requested to complete this Survey for all experience years. Each ZIP code may have multiple entries, one for each of the responsive experience years.

#### Section D – Number of Policies With Fire Coverage Written New

Enter the total number of policies with fire coverage written new in the ZIP code during each of the experience years. All values should be whole numbers and positive. Do not use "-" for zero.

#### Section E – Number of Policies With Fire Coverage Renewed

Enter the total number of policies with fire coverage renewed in the ZIP code during each of the experience years. All values should be whole numbers and positive. Do not use "-" for zero.

Note: For specific instances where a policy was written new and renewed in the same year (e.g., 6-month policy), only count the policy as new (report under Section D only) to avoid doublecounting. Similarly, if a 6-month policy was renewed twice during the calendar year, only count it as one renewed policy here in Section E.

#### Section F – Number of Policies With Fire Coverage Non-Renewed

Enter the total number of policies with fire coverage that were non-renewed in the ZIP code during each of the experience years. All values should be whole numbers and positive. Do not use "-" for zero.

#### Section G – Number of Policies With Fire Coverage Cancelled

Enter the total number of policies with fire coverage that were cancelled in the ZIP code during each of the experience years. All values should be whole numbers and positive. Do not use "-" for zero.

#### **NonRenewals Worksheet**

The "NonRenewals" worksheet collects policy details about each policy with fire coverage that was nonrenewed (i.e., polices that expired at the end of the policy term) during each of the responsive experience years and included in the totals reported in the "PolicyCounts" worksheet.

#### Section A – Non-Renewed Totals

This section automatically tallies the total number of non-renewed policies reported in the worksheet based on the year of the effective date of the non-renewal. Make sure that the totals accurately reflect the experience reported in the worksheet.

#### Section B – Policy Number

Provide the policy number, which should not exceed 16 digits in length. You may use both alpha and numeric characters. Each row should have a unique policy number (i.e., the same policy number should not occur more than once) and should also not be repeated in the "Cancellations" worksheet (i.e., the same policy number should not be both cancelled and non-renewed).

#### Section C – ZIP Code

Report experience for all Washington ZIP codes where business was non-renewed effective as of 2021, 2022, or 2023. Valid Washington ZIP codes are from 98001 to 99403. We will accept 98000 for policies where a valid ZIP code cannot be obtained. If there are a large volume of invalid ZIP codes, use the <u>Explanations</u> worksheet to describe the issue. Each ZIP code may have multiple entries, one for each of the responsive experience years.

#### Section D – Address (street number and street name)

Report the address, both the street number and street name, for the property on the policy that was non-renewed. An example input would be 123 Main Street.

#### Section E – City

Report the city as seen on the address for the property on the policy that was non-renewed.

#### Section F – Effective Date of Non-Renewal

Enter the date when the coverage for the policy was non-renewed. The effective date of the non-renewal must have occurred in 2021, 2022, or 2023.

#### Section G - J - Reason for Non-Renewal

Each section header contains a potential reason that may have been included in the nonrenewal notice sent to the consumer. Place an "x" in the cell if the reason applied to the given non-renewal. Otherwise, leave the cell blank. You may select multiple reasons for any nonrenewal. If you mark any of the reasons in Sections H through O, then no explanation is necessary if you also select "Other" as an additional reason. If you selected "Other" as the ONLY reason for the non-renewal, an explanation must be provided with the verbatim language used in the notice in Section Q.

H. Insurer initiated nonrenewal- insurer ceased to offer a specific line of coverage

- I. Insurer initiated nonrenewal- Insurer withdrew from Washington state market
- J. Insurer initiated nonrenewal- other reasons
- K. Insured initiated nonrenewal

#### **Cancellations Worksheet**

The "Cancellations" worksheet collects policy details about each policy with fire coverage that was cancelled (i.e., policies that expired prior to the end of the policy term) during each of the responsible experience years and included in the totals reported in the "PolicyCounts" worksheet.

#### Section A – Cancelled Totals

This section automatically tallies the total number of cancelled policies reported in the worksheet based on the year of the effective date of the cancellation. Make sure that the totals accurately reflect the experience reported in the worksheet.

#### Section B – Policy Number

Provide the policy number, which should not exceed 16 digits in length. You may use both alpha and numeric characters. Each row should have a unique policy number (i.e., the same policy

number should <u>not occur more than once</u>) and should also not be repeated in the "NonRenewals" worksheet (i.e., the same policy number should <u>not be both cancelled and non-renewed</u>).

#### Section C – ZIP Code

Report experience for all Washington ZIP codes where business was cancelled effective as of 2021, 2022, or 2023. Valid Washington ZIP codes are from 98001 to 99403. We will accept 98000 for policies where a valid ZIP code cannot be obtained. If there are a large volume of invalid ZIP codes, use the <u>Explanations</u> worksheet to describe the issue. Each ZIP code may have multiple entries, one for each of the responsive experience years.

#### Section D – Address (street number and street name)

Report the address, both the street number and street name, for the property on the policy that was cancelled. An example input would be 123 Main Street.

#### Section E – City

Report the city as seen on the address for the property on the policy that was cancelled.

#### Section F – Effective Date of Cancellation

Enter the date when the coverage for the policy was cancelled. The effective date of the cancellation must have occurred in 2021, 2022, or 2023.

#### Section G - I – Reason for Cancellation

Each section header contains a potential reason that may have been included in the cancellation notice sent to the consumer. Place an "x" in the cell if the reason applied to the given cancellation. Otherwise, leave the cell blank. **You may select multiple reasons for any cancellation**. If you mark any of the reasons in Sections H through N, then no explanation is necessary if you also select "Other" as an additional reason. If you selected "Other" as the ONLY reason for the cancellation, an explanation must be provided with the verbatim language used in the notice in Section O.

G. Insurer initiated Cancellation - due to nonpayment of premium.

- H. Insurer initiated Cancellation other reasons.
- I. Insured initiated Cancellation.

#### Reconciliation

The "Reconciliation" worksheet compares the number of non-renewals and cancellations reported on the "PolicyCounts" worksheet against the numbers reported in the "NonRenewals" and "Cancellations" worksheets. There are two tables to review, one for non-renewals, and one for cancellations.

Each table automatically calculates the (1) total number of non-renewals/cancellations reported in "PolicyCounts" worksheet for each of the experience years, the (2) total number of policies reported on the "NonRenewal" or "Cancellation" worksheets (based on the year of the effective dates of the non-renewals or cancellations), and the (3) difference between the totals in (1) and (2). If the (3) difference cell is non-zero, enter an (4) explanation to reconcile any differences between the worksheets.

#### **Explanations**

Use the worksheet "Explanations" to provide explanations or supplementary details with regard to any of the questions or data submitted.

## **Submitting the Excel Workbook**

Upon completion of the Excel workbook, **please rename "Nonrenewaldata\_NAIC Number.xlsx" replacing "NAIC Number" with your NAIC Number**. For example, if your company NAIC number is 12345, the workbook should be renamed as Nonrenewaldata\_12345.xlsx. The file will fail to process if it is not named correctly.

Please upload the renamed Excel workbook to Box (<u>Click Here for Box upload link</u>) by the submission deadline. Please reach out to <u>datacall@oic.wa.gov</u> with any questions.

## **Definitions and Examples of Non-Renewals and Cancellations**

In order to ensure accurate reporting for this datacall, the following provides definitions and examples of the terms "Non- Renewals" and "Cancellations". Please note that this is not an all-inclusive list of how non-renewals and cancellations can be defined. However, these are presented to help with understanding the distinction between the two terms.

#### **Non-Renewals**

- For purposes of this datacall, non-renewals are defined as policies that naturally expired having reached the <u>end</u> of the term for which the policy was issued or the end of the period for which a premium has been paid.
- Non-Renewals can also be defined as:
  - Any policy sent a notice by the insurer to the named insured that the insurer is unwilling to renew the policy for reasons specific in such notice.
  - A current policy where a renewal offer was rejected by the consumer, and the policy naturally expired at the end of the policy period.

#### **Cancellations**

- For purposes of this datacall, cancellations are defined as policies that were terminated <u>prior to the end</u> of term for which the policy was issued or the end of the period for which a premium has been paid.
- Cancellations can also be defined as:
  - Any request to terminate coverage by the consumer during a policy term, unless the termination request is at the end of the policy term, in which case it should be deemed a non-renewal.
  - Termination of coverage by an insurer prior to the end of the policy term for reasons specified in such notice.

#### Non-Renewals and Cancellations are distinguished by TIMING.

If the expiring term is fully completed and policy coverage has ceased – it is to be reported as a **non-renewal**.

If the policy coverage expired prior to the completion of the current term, it is to be reported as a **cancellation**.

#### Please be sure to understand this distinction to avoid double counting for these items.

Below are multiple examples and scenarios which have been designed to illustrate how these data elements need to be reported.

#### A new policy that was written effective March 1, 2021 for a 1-year term.

1. If a request was made to cancel the policy due to the sale of the home on August 1, 2021 (5 months later).

Number of New Policies in 2021 = 1 Number of Cancelled Policies in 2021 = 1

2. The policy was renewed on March 1, 2022, but the consumer requests to cancel the policy April 1, 2022.

Number of New Policies in 2021 = 1 Number of Renewed Policies in 2022 = 1 Number of Cancelled Policies in 2022 = 1

#### An existing policy was offered a renewal on December 1, 2021 for a 1 year term.

3. If the policy lapsed on December 1, 2021 due to non-payment of premium, but then the consumer reinstated the policy within 15 days after the policy lapsed.

Number of Renewed Policies in 2021 = 1

Number of Non-Renewed Policies in 2022 = 0

- Given that the insured paid the premium and the policy was subsequently reinstated, it should count as a "renewed" policy in the original calendar year assuming there were no gaps in coverage. Even though the premium was paid by the consumer after the lapse of the policy period, it should still be counted as though the renewal happened in a timely fashion assuming there were no gaps in coverage.
- 4. If the consumer accepts the first renewal offer (on Dec 1, 2021), but the company decides to non-renew the policy a year later, on December 1, 2022.

Number of Renewed Policies in 2021 = 1 Number of Renewed Policies in 2022 = 0 Number of Non-Renewed Policies in 2022 = 1

## If your company writes 6 month term residential dwelling policies: A new policy that was written effective February 1, 2021 for a 6 months term (renewal date August 1, 2021)

1. The consumer accepts the renewal offer on August 1, 2021, but rejects the second renewal offer on February 1, 2022.

Number of New Policies in 2021 = 1

Number of Renewed Policies in 2021 = 0 (Avoid double counting a policy as both new and renewed in same year)

Number of Non-Renewed Policies in 2022 = 1

2. The consumer accepts the renewal offer on August 1, 2021, but canceled the policy in December 2021.

*Number of New Policies in 2021 = 1* 

Number of Renewed Policies in 2021 = 0 (Avoid double counting a policy as both new and renewed in same year) Number of Cancelled Policies in 2021 = 1