Affordability and Availability Playbook Outline Choose an item.

- *Audience*: State Insurance Regulators, Legislators, and Policymakers
- *Purpose*: A resource for state insurance regulators to address the growing challenges of homeowners' insurance affordability and availability

PART I: Direct Consumer Impact, Macro Trends, and Factors Increasing Existing Risks

A. Overview:

i. **How the Insurance Market Regulatory Structure Shapes Insurance Solutions**

ii. **Reinsurance**

iii. **Climate change's role as a main factor for affordability and availability.**

iv. **Data Transparency and its Impact on Availability and Affordability**

   a. Proprietary Wildfire Maps Lead to Varied Standards and Risk Classifications.
   b. Flood Mapping Concerns and the Need for a Common Standard
   c. Continued access to NOAA and FEMA data for weather modeling

v. **Communication and Education gaps**

vi. **Influence of Adjacent Industries**

   a. HOAs
   b. Housing development and rebuilding costs

B. Homeowners' Insurance Availability and Affordability: Direct Consumer Impact

i. **Affordability and Availability Intro**

ii. **Policyholder Impact and Availability**

   a. Lack of or limited offering of insurance coverages and/or options
   b. Growing Protection Gap

iii. **Interconnectedness of homeowners insurance on related markets**

   a. Homeowners' insurance issues affect property, lending, and public finances.
   b. Landlords may raise rents due to higher insurance costs.
   c. Falling home values can hurt local economies.
   d. Affordable housing initiatives (informed by testimony in Colorado)

PART 2: Peril-Specific State Innovation and Action

A. Overview:

B. Cross-peril strategies

i. **Tort Reform**

ii. **Parametric Insurance**

iii. **Risk Mitigation and Incentives**

   a. Overview and role of incentive and grant programs (FORTIFIED, NFIP CRS)
   b. Premium incentives tied to verified mitigation action
   c. Emerging building technologies
   d. CIPR Playbook mitigation program resource and program

iv. **Public and Private Sector Collaboration**

a. Community-Based Catastrophe Insurance pilots
b. State-led risk pools and regional modeling consortia
c. Education campaigns with nonprofit and local partners
d. State programs to backstop risk (e.g., catastrophe funds)
e. Collaboration with emergency management and state agencies

v. **Technology and Data Innovation**

a. GIS/satellite-based risk scoring and post-disaster verification
b. AI for claims triage and fraud reduction
c. Climate model integrations with state affordability forecasting

vi. **Equity and Market Access**

a. Monitoring insurance deserts and coverage gaps
b. Addressing affordability in tribal, low-income, and rural regions
c. Balancing risk-based pricing with social protections

C. Hurricanes, Severe Convective Storms, Wind – Florida (FL), Mississippi (MS), Alabama (AL), Minnesota (MN), Wyoming (WY):

i. **Introduction**

a. Overview of perils and trends

ii. **Florida**

a. Reports
    i. IBHS Study Rating-the-States-report.pdf
b. Data Collection:
    i. Catastrophe Claims Data
c. Strategy, Initiatives, & Resources:
    i. My Safe FL Home,
    ii. Florida Public Hurricane Loss Projection Model,
    iii. Florida Wind Mitigation Programs (Adopted Forms)
    iv. Consumer Outreach and Educational Materials:
        1. Consumer education landing page,
        2. Plan, Prepare, Protect: Are You Disaster Ready?
        3. Demolish Contractor Fraud: Steps to Avoid Falling Victim
        4. Applying For Homeowners Insurance Guide
d. Partnerships:
    i. Citizens – Depopulation/Takeout Program
    ii. FLOIR: Takeout Company Approvals

iii. **Mississippi**

a. Reports
    i. 2024 Extreme Wind Conference
b. Data Collection:

c. Strategy, Initiatives, & Resources:
    i. Discontinued Strengthen MS Homes Grant
    ii. MWUA mitigation incentives
    iii. FORTIFIED premium discounts
    iv. Building code discussions, retrofit education, rural tornado-safe retrofits
    v. Risk pricing
    ii. Consumer Outreach and Educational Materials:
        1. Homeowner's Insurance Shopping Tool
        2. Consumer Hurricane Checklist
        3. MS Residential Property Insurance Underwriting Association
d. Partnerships:
    i. Windstorm Insurance Network (WIND)

iv. Alabama

a. Reports
    i. FORTIFIED Homes Study
    ii. Affordable Homeowners Insurance Commission Report
    iii. Coastal Insurance Working Group Report
b. Data Collection:
    i. Hurricane Sally data call
    ii. Property Insurance Clarity Act requires insurers to report annual data
c. Strategy, Initiatives, & Resources:
    i. 25% of Alabama coastal homes now meet Fortified or better standards
    ii. Strengthen Alabama Homes
    iii. Premium Discounts-FORTIFIED
    iv. Tax incentive for home mitigation (retrofit deduction, CSA)
    v. Consumer Outreach and Educational Materials:
        1. County Safe Rooms
        2. Presentations to community groups statewide.
        3. Sends staff to Disaster Recovery Centers following major storms
        4. Hands out info packets at major events
        5. Consumer's Guide to Homeowners Insurance and website tools
d. Partnerships:
    i. Alabama Insurance Underwriting Association
    ii. The Hurricane Insurance Issues Task Force is considering an insurance referral service for coastal homeowners

v. Minnesota

a. Reports
    i. Homeowners Report
    ii. Minneapolis Fed survey report
b. Data Collection:
    i. Insurers are required to submit homeowners' insurance data annually

c. Strategy, Initiatives, & Resources:
    i. FAIR plan, required fire insurance, coverage up to replacement value, and limited cancellation reasons.
    ii. Requires replacement cost coverage, adjustable limits, and bans rate adjustments based on specific factors.
    iii. Strengthen Minnesota Homes Grant Program
    iv. Minnesota is planning to require discounts for FORTIFIED roofs
    v. Consumer Outreach and Educational Materials:
        1. Disaster Information Center
d. Partnerships:

vi. Wyoming

a. Reports
b. Data Collection:
    i. Data calls for rules on the top 7 homeowner's insurers
c. Strategy, Initiatives, & Resources:
    i. Some insurers provide free water detection devices to homeowners to lower water claims.
    ii. Consumer Outreach:
        1. Consumer's Guide to Home Insurance and a Home Insurance Shopping Tool
        2. DOI website tools and monthly PSAs
d. Partnerships:
    i. Regulatory communication with P/C trades

D. Tornadoes – Alabama (AL), Iowa (IA), Oklahoma (OK), Mississippi (MS)

i. Introduction

a. Tornado trends

ii. Alabama

a. Reports:
    i. Affordable Homeowners Insurance Commission Report (2012)
    ii. Hurricane Sally IBHS Study
b. Data Collection:
    i. Annual insurer reporting via SB 210.
    ii. Post-catastrophe claims data calls
c. Strategy, Initiatives, & Resources:
    i. Strengthen Alabama Homes Grant Program
    ii. Mitigation discounts (20–60%).
    iii. Catastrophe Savings Accounts
    iv. AIUA (Wind Pool) coverage.
    v. Consumer Outreach and Educational Materials:

        1. Deployment of mobile help centers
        2. Post-tornado consumer bulletins and hotline.
        3. Community safe rooms
  d. Partnerships:
    i. IBHS and Smart Home America for FORTIFIED
    ii. FEMA and AEMA collaboration
    iii. ACIIR, PCIAA, AL DOI, and SHA partnered to create the "2016 Tornado Preparedness Guide & Insurance Tips."

iii. Mississippi

  a. Reports:
    i. Clarity Act data sets (HB 739)
  b. Data Collection:
    i. Clarity Act database
    ii. NAIC catastrophe data calls
    iii. Post-event loss tracking
  c. Strategy, Initiatives, & Resources:
    i. Strengthen MS Homes grants (FORTIFIED Roof).
    ii. MEMA Safe Room Grant Program.
    iii. Consumer Outreach and Educational Materials:
        1. Tornado Claims Bulletin, consumer alerts, and annual Severe Weather Preparedness Weeks
        2. Claims and Preparedness Guides and Home Inventory Tools
        3. In-person help at Disaster Centers
        4. Safe room education
  d. Partnerships:
    i. MID and MEMA coordination
    ii. Collaborate with FEMA's HMA to provide additional safe room funding
    iii. Smart Home America program alignment
    iv. 2024 Tornado/Wind Conference

iv. Iowa

  a. Reports:
  b. Data Collection:
  c. Strategy, Initiatives, & Resources:
    i. State strategy and initiatives, not specific to the IA DOI
        1. Enhanced Mitigation Plan
        2. Natural Hazard Mitigation Loan Program
        3. Disaster Housing Assistance Fund
        4. Public Safe Room Grants
        5. Iowa Individual Disaster Assistance Grant Program (IIAGP)
        6. Proposed Strengthen Iowa Homes program
    ii. Consumer Outreach:

1. Consumer Connection bulletins
2. Claims guide circulation post-disaster
3. DRC representatives for on-site claim help
4. Rural Disaster Case Advocacy by Community Agencies

d. Partnerships:

i. State and IA State University partnerships
ii. Iowa (HSEMD) and Finance Authority on resilience loans.
iii. Iowa qualifies for additional FEMA disaster mitigation funding due to its Enhanced Mitigation Plan.

v. Oklahoma

a. Reports:

i. Tornado Damage Mitigation: Benefit–Cost Analysis of Enhanced Building Codes in Oklahoma

b. Data Collection:

i. Pre and Post Disaster Data Calls

c. Strategy, Initiatives, & Resources:

i. SoonerSafe Safe Room Rebate Program
ii. OK-MAP program
iii. OKReady grant program
iv. Prior National Tornado Summits- Insights
v. Consumer Outreach:
   i. Bulletins, such as the "Are You Ready for Storm Season?"
   ii. Fraud prevention guides
   iii. Distribute pre-storm public awareness tools
   iv. Mulready Minutes Podcast
   v. Onsite post-disaster resource centers (MARCs)
   vi. Statewide public education campaigns and early warning investments

d. Partnerships:

i. OK, OID and OEM cooperation
ii. OK OID partners with IBHS to administer the SOH program
iii. The UCO, OEM, and OID partner on the "Get Ready" campaign

E. Wildfire (California, Wyoming, Colorado, Washington)

i. Introduction

a. Wildfire, drought, wildland-urban interface (WUI) discussion and trends.

ii. California

a. Reports

i. Sustainable Insurance Roadmap
ii. Climate Insurance Report
   1.

b. Data Collection:
    i. The DAR Division gathers and reports wildfire-related insurance data, supporting the Sustainable Insurance Strategy.
c. Strategies, Initiatives and Resources
    i. Modernization of the FAIR Plan
    ii. Consumer Outreach and Engagement
        1. Partnership Initiative providing monthly webinars
        2. Local Climate Planning Hub
        3. Safer from Wildfires Consumer FAQ
        4. Home Insurance Finder
        5. Developing pilot wildfire insurance options
d. Partnerships
    i. University of California, California State University, and other research institutions to examine risk assessment and risk reduction measures.
    ii. Public Wildfire Catastrophe Model Strategy Group
    iii. NAIC Climate and Resiliency Task Force
    iv. National Climate Resilience Strategy for Insurance
    v. International Association of Insurance Supervisors (IAIS)

iii. Wyoming

a. Reports:
    i. Wildfire risk is analyzed in broader state plans
    ii. The Wyoming State Forestry Division's 2020 Forest Action Plan
    iii. State Mitigation Plan that identifies wildfire as a key hazard
    iv. 2024 Wyoming Wildfire Update to legislators
    v. 2023 Insurance Commissioner's briefing
b. Data Collection
    i. Wyoming Wildfire Risk Assessment Portal (WYWRAP)
    ii. The DOI informally tracks via complaints and agent feedback
b. Strategies, Initiatives, and Resources
    i. Internal capacity building/hiring
    ii. Coordinates with the State Fire Marshal and Forestry Division
    iii. The State Forestry Division's "What is your risk?" campaign
    iv. Wildfire Mitigation Grants through WSFD
    v. Consumer Outreach and Educational Materials
        1. Brochures and online resources on preparation and claims.
        2. Urges consumers post-wildfire to review coverage
        3. "Insurance fairs"
        4. The Insurance Commissioner urges regular home insurance reviews in local media
        5. "Wildfire and Homeowner Insurance FAQ" webpage
        6. Annual "Wildfire Preparedness" workshops in high-risk areas
c. Partnerships

i. Western Governors’ Association and informal regulator networks
ii. The State Forestry Division and DOI liaison working group

iv. Colorado

a. Reports
   - **i.** Marshall Fire Insurance Claims Study (2024)
   - **ii.** Marshall Fire Operational After-Action Report
   - **iii.** The DOI’s 2023 report on homeowners insurance availability

b. Data Collection
   - **i.** DOI data calls to get insurer reports
   - **ii.** Annual reporting on mitigation credits is planned
   - **iii.** DOI reported on claims and underinsurance after the Marshall Fire
   - **iv.** NAIC Insurer Climate Risk Disclosure Survey

c. Strategies, Initiatives, and Resources:
   - i. Wildfire Partners
   - ii. Firewise USA
   - iii. Fire Adapted Colorado
   - iv. Community Wildfire Protection Plans (CWPPs)
   - v. The Community Navigator Program
   - vi. The Wildfire Risk Reduction Grant Program
   - vii. Community Wildfire Mitigation Loan Fund
   - viii. On July 1, 2025, Colorado adopted a model code
   - ix. Consumer Outreach and Educational Materials
     1. Wildfire Insurance Resources webpage with FAQs, checklists, and assistance contacts
     2. United Policyholders partnership for webinars
     3. Town hall meetings virtually and in-person
     4. Boulder has a public wildfire risk reduction campaign
     5. Partners with Fire Adapted Colorado for a free wildfire insurance guide

d. Partnerships
   - **i.** Central Colorado Forest Collaborative (CCFC)
   - **ii.** State Recovery Task Force and Technical Assistance for recovery

v. Washington

a. Reports
   - **i.** Disaster Resiliency Work Group 2020 report
   - **ii.** Wildfire Mitigation and Resiliency Standards Work Group (2025) report
   - iii. December 2024, the OIC submitted a report to the Washington State Legislature on insurance affordability and availability for housing providers serving extremely low-income households.
   - iv. Low-income housing insurance report

        v. Annual Wildfire Risk Insurance Reports
        vi. Community Fire Resilience Workgroup report
    b. Data Collection
        i. DNR's Wildfire Ready Neighbors (WRN) program collects data
        ii. DOI collects annual insurer non-renewal data
        iii. The OIC gathers claims data after wildfires
    c. Strategies, Initiatives and Resources
        i. Internal capacity building
        ii. Exploring community-based parametric insurance for wildfires
        iii. Home hardening grants
        iv. Wildfire Ready Neighbors (WRN)
        v. Distributes "Demystifying Insurance: A Focus on Wildfire"
        vi. Promotes Community Wildfire Protection Plans (CWPPs)
        vii. The OIC's Consumer Advocacy Program and hotline
        viii. Consumer Outreach and Educational Materials
            1. "Washington Wildfire Preparedness Month" held in May
            2. Provides details about its FAIR Plan for wildfire coverage
            3. The DOI holds Climate Insurance Listening Sessions
            4. The OIC's Wildfires and Homeowners Insurance page
            5. Commissioner media appearances after major fires
            6. County fairs and expos, especially in fire-prone regions
            7. Multilingual insurance materials and outreach to Spanish-speaking agricultural communities through local radio
            8. Claims advocacy after wildfires
    d. Partnerships
        i. Western States Climate Summit
        ii. PNWER collaboration
        iii. Partners with PCI and NWIC to develop wildfire FAQs and messaging
        iv. IBHS contributes mitigation strategy and research
        v. The OIC and DNR co-chair a policy work group and coordinate with emergency and fire officials on recovery and fraud issues.
        vi. Multi-state catastrophe response exercises
        vii. Department of Natural Resources Programs & Services

F. Earthquake, Fire Following Earthquake, Tsunami – California (CA)

i. Introduction

    a. Earthquake and Tsunami overview and trends.

ii. California

    a. Earthquake Insurance:
        i. California Earthquake Authority (CEA)
        ii. Nonaffiliated Earthquake Insurance Providers
        iii. Parametric Earthquake Insurance

b. Residential Earthquake Retrofit Grants and Premium Discounts:
    i. CA Seismic Retrofit Grants - Earthquake Retrofit Grants
    ii. CRMP incentive program
    iii. other financial assistance options for earthquake retrofits
c. Structural Risks and Other Hazard Mitigation
    i. CRMP website explains Structural Risks to residential properties
    ii. Hazard Mitigation resources on the California Earthquake Alliance website.
d. Research
    i. Statewide California Earthquake Center
e. Earthquake Brace + Bolt incentive program
f. Emerging Risk
    i. Sea level rise worsens tsunami risk in Southern California.

G. Flood (Iowa, Minnesota, Florida, Mississippi, Louisiana)

i. Introduction

a. Snow, rainstorms, flash floods, inland flood, and coastal flood overview and trends.

ii. Iowa

a. Reports:
c. Data Collection:
    i. 2020 2018 AND 2019 NAIC Private Flood Data Calls
    ii. NAIC PCMI data call participating state
d. Strategy, Initiatives, & Resources:
    i. Consumer Outreach and Educational Materials:
        1. Agent education is crucial in Iowa due to the need for flood insurance from frequent river flooding
        2. **Post Disaster Resources | Iowa Insurance Division**

Partnerships:
    i. Iowa Flood Center

iii. Minnesota

a. Reports:
b. Data Collection:
c. Strategy, Initiatives, & Resources:
    i. Flood and Stormwater mitigation incentives/grants
    ii. Consumer Outreach and Educational Materials:
        1. "Flood Insurance Fact Sheet for Property Owners Final"
        2. "Flood Insurance Fact Sheet April 2020 Update."
d. Partnerships:
    i. Mississippi River Cities and Towns Initiative (MRCTI) and Munich Re parametric insurance pilot

iv. Florida

a. Reports:
   i. Sea-Level Impact Projection (SLIP) study
   ii. Resilience Inference Performance Level (RIPL) report
b. Data Collection:
   i. 2018-2020 NAIC Private Flood Data Call
   ii. FL DOI Data Call Page
c. Strategy, Initiatives, & Resources:
   i. SAMPL™ Sustainable Adaptive Material Performance Level
   ii. FAW Dashboard
   iii. FDEM's Elevate Florida program
   iv. Florida Public Flood Loss Projection Model
   v. Consumer Outreach and Educational Materials:
      1. Flood Insurance page
d. Partnerships:
   i. The Florida Flood Hub for Applied Research and Innovation
   ii. The Flood Mitigation Assistance Program

v. Mississippi

a. Reports:
b. Data Collection:
c. Strategy, Initiatives, & Resources:
   i. Requires disclosure of flood risks and prior flood damage
   ii. Consumer Outreach and Educational Materials:
      1. March Mississippi Flood Insurance Awareness Week
d. Partnerships:
   i. Partner with the Mississippi Collision Repair Association to protect residents from buying flood-damaged cars

PART 3: Emerging Protection Gaps

A. Overview:

- **Explain intent**: to provide potentially replicable strategies for policymakers to leverage when addressing affordability and availability for homeowners' insurance.
- **Explain the structure**: State peril profiles (by peril, state, actions/resources)
- **Explain focus**: 1) strategies various states have used that could be leveraged by other states, 2) Peril dynamics, including how emerging risks are driving peril intensity and insurance market pressures

B. Atmospheric Rivers and Flooding (California, Oklahoma)

i. California

a. Introduction

b. Reports

  i. Climate Insurance Report

  ii. Sustainable Insurance Roadmap

c. Regulations

  i. Sustainable Insurance Strategy

  ii. Catastrophe Modeling and Rate Making Regulations

d. Legislation Highlights

  i. Climate Resilience Districts

  ii. Sea Level Rise Planning and Adaptation

e. Strategies, Initiatives, and Resources

  i. Inclusive and Innovative Insurance Pilot Projects

f. Consumer Outreach and Engagement

  i. Partnership Initiative

  ii. Local Climate Planning Hub

ii. Oklahoma

a. Reports:

b. Data Collection:

  i. Most storm damage is collected through OEM

c. Strategy, Initiatives, & Resources:

  i. Oklahoma Flood and Drought Management Task Force

d. Partnerships:

  i. OEM, County Commissioners, and VOAD

  ii. NWS Flooding webpage:

e. Consumer Outreach and Educational Materials:

  i. Consumer Assistance Flood Insurance Webpage

  ii. Consumer Assistance Flood Insurance FAQS

C. Extreme Heat

i. California

a. Reports

  i. Sustainable Insurance Roadmap

  ii. Climate Insurance Report

  iii. Protection Gap Study for Extreme Heat

    1. Download Full Report

    2. Download Key Findings and Recommendations

    3. Extreme Heat Ranking System CalHeatScore

b. Introduction:

c. Reports and Studies

  i. Insuring Extreme Heat Risks

ii. Climate Insurance Report

d. Protection Gap Study for Extreme Heat

e. Legislation Highlights

i. Climate Risk Insurance Solutions: SB-30 Insurance: climate change. (Insurance Code, section 12922.5)

ii. Climate Insurance Law

iii. Climate Insurance Working Group

iv. AB-2238 Extreme heat: statewide extreme heat ranking system. (California Public Resources Code, Section 71410)

v. Assembly Concurrent Resolution No. 109 Extreme heat: state response.

f. Initiatives

i. Inclusive and Innovative Insurance Pilot Projects

g. Consumer Outreach and Engagement

i. Partnership Initiative

ii. Local Climate Planning Hub

PART 4: Strategies and Implementation Considerations

A. Overview:

i. This section offers insights for state insurance regulators aiming to implement approaches featured in other states across the Playbook. The guidance is structured around practical considerations.

ii. Where appropriate, regulators are encouraged to consult with stakeholders in home jurisdictions to assess the potential long-term impacts of proposed measures on markets and customers.

B. Supporting Mitigation Incentives

i. Encourage insurer filings that recognize FORTIFIED or similar standards.

ii. Use IBHS data and other states' pilot programs to guide outreach and insurer participation.

iii. Coordinate with grant programs and share claims data to support targeted mitigation efforts.

C. Legislative and Regulatory Tools and Summary of State Legislation, Regulations, and Codes

i. Informing Legislative Efforts

ii. Reviewing and Updating Rules

iii. Tables of Each Participating State's Florida (The state will ultimately determine which regulations, legislation, and programs are included.)

D. Regulatory Data and Transparency Tools

i. Risk and Exposure Data

a. Examine insurers' risk rating methods and require modifications to classifications or zone definitions to improve consistency and fairness.

ii. Claims and Market Monitoring

    a. Issue data calls after disasters to track claims, non-renewals, and policy lapses.
    b. Use ZIP-code-level insurer filings to identify coverage gaps or premium spikes

iii. Internal Reporting Tools
    a. Maintain dashboards to support regulatory and legislative decisions.

E. Market Access

i. Mapping Insurance Deserts

ii. Structuring Subsidies and Discount Programs
    a. Refer to strategies in Section B to align mitigation incentives with affordability measures for income-eligible homeowners.
    b. Support use of federal BRIC and CDBG funds to supplement state-based affordability measures.

iii. Enforcing Fair Underwriting
    a. Monitor for discriminatory practices, enforce cancellation protections, and ensure FAIR Plans address availability gaps.

F. Partnerships and Capacity Building

i. Support engagement of insurance, fire, emergency management, and forestry agencies to align goals.

ii. Support local planning efforts using insurance data insights.

iii. Grow internal expertise by creating dedicated units, joining NAIC workstreams, and partnering with universities for training

G. Consumer Education and Engagement

i. Launch plain-language, multilingual campaigns using community channels to deliver clear, tailored info to diverse groups

ii. Offer step-by-step insurance guides and tips on coverage, appeals, and discounts.

iii. Use innovative outreach, including interactive tools, recovery resources, and targeted social marketing.

iv. Partner with local groups to reach vulnerable communities.