



July 8, 2025

Anne Kennedy
General Counsel
National Council of Insurance Legislators
616 Fifth Avenue #106
Belmar, NJ 07719

Dear Ms. Kennedy,

The National Roofing Contractors Association greatly appreciates the opportunity to comment on the “Storm Chaser Consumer Protection Act” model legislation currently being considered by the National Council of Insurance Legislators. We have reviewed the model legislation and have a few comments, concerns and questions as indicated below.

First, we have concerns with some of the terms used in the model legislation such as “more bad actors,” “accreditation agency” and “registration.” We would appreciate clarification on what or who is being accredited and the registration process being referenced.

The model legislation “allows the accrediting body to determine the specific insurance amounts.” Many states require proof of insurance for licensing issuance or renewal, however setting specific limits on liability goes beyond where most states are. States set minimum limits on workers' comp and auto coverages, and some have set minimum limits on liability coverages. This sounds very different than setting a minimum limit requirement. NRCA would request that this also be clarified.

Another concern is that everything in the model legislation seems to be directed against the contractor. However, we would note that there are clearly also problems with others involved in this marketplace, including insurance adjusters, public adjusters, material distributors, etc. We believe this concern should be addressed by taking a more comprehensive approach to the issues at hand in the model legislation.

In some instances, the consumer protection requirements will be superseded by individual state requirements and roofing contractor licensing requirements. Illinois, for example, is very strict with its consumer protection laws and is more stringent than this. We would recommend making it clear that the model legislation does not preempt more protective state laws.

Given these concerns and comments, for the upcoming July 19 meeting, NRCA recommends the Committee re-adopt the Model on a meeting-to-meeting basis while proposed amendments are further developed.

Again, NRCA greatly appreciates the opportunity to provide input and participate in the development of the model legislation moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Duane L. Musser". The signature is fluid and cursive, with a long horizontal stroke at the end.

Duane L. Musser
Vice president, government relations