Regulating in the Dark

State Insurance Commissioners and the Fight for Homeowners Insurance Data Transparency

By Rick Morris

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PUBLIC CITIZEN

Acknowledgments

This report was written by Rick Morris, Senior Insurance Campaigner with Public Citizen's Climate Program.

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Contents

Key Findings

- Most insurance commissioners' offices did not respond to multiple inquiries about the homeowners market data call.
- Of those who responded, most are participating in the data call.
- Too often, whether the public will be able to see a state's data depends on staff capacity and the whims of individual insurance commissioners.
- Without public access to this data, markets can neither be considered competitive, nor provide meaningful signals about climate risk.

Executive Summary

America's home insurance crisis is also an information crisis. Homeowners and renters are burdened by rising premiums, shrinking coverage options, and increasingly difficult claims experiences. Although the insurance industry argues that competitive markets and price signals give consumers information they need to make informed decisions, much of the most basic information about homeowners insurance markets remains inaccessible to the public and even regulators themselves.

In early July 2026, Public Citizen surveyed all 56 state and territorial insurance commissioners about their participation in the ongoing homeowners market data call and their plans to make the resulting information publicly available at the ZIP-code level. Twenty-three offices responded in some fashion: 18 answered our questions and 5 responded to our outreach without addressing the questions. Among the 18 offices that answered the questions, 78%—14 offices—affirmed that they were participating in the homeowners market data call. However, since over half of the insurance offices did not respond, we cannot be sure of how many states will be participating.

Participation in data collection does not necessarily mean a commitment to transparency. While 28% of responding offices said they support publication of homeowners insurance data at the ZIP-code level, 56% did not directly answer the question and another 17% gave conditional answers tied to the National Association of Insurance Commissioners' (NAIC) forthcoming recommendations. In other words, most insurance commissioners who responded to our survey were unwilling to say whether they believe the public should have access to granular information about its own insurance market.

Some states already make varying categories of ZIP-code-level information publicly available, others deferred the question to the NAIC, and others have no plans to publish this data. This fragmented landscape means that the amount of information available to a consumer too often depends solely on the whims of their insurance commissioner. It also makes it more difficult to compare insurance markets across state lines, identify regional trends, and determine whether insurers are providing consumers with meaningful choices.

> **The amount of information available to a consumer often depends solely on the whims of their insurance commissioner.**

Dramatically unequal staffing and resources are available to state and territorial insurance departments. When some regulators oversee thousands of insurers with only a handful of staff, transparency cannot depend entirely on the resources of individual insurance departments.

The stakes are particularly high because competition is supposed to be a central pillar of insurance regulation. The NAIC itself describes its mission as ensuring "fair, **competitive**, and healthy insurance markets to protect consumers." But when consumers cannot meaningfully compare insurance companies' premiums, claims and denials, nonrenewals, and other basic information, insurance companies cannot be meaningfully said to be competing for their business.

In order to overcome disparities of staff capacity and ensure truly competitive state insurance markets, state insurance regulators and the NAIC should work together to maintain a standardized publicly accessible national dataset.

At a minimum, regulators should publish average premiums, losses, deductibles, nonrenewal notices, and mitigation discounts by year, ZIP code, and policy type; update the information regularly; and formally recognize consumer access to market information as a fundamental component of a competitive insurance market.

Introduction: The Opaque Home Insurance Crisis

The homeowners insurance crisis is also an information crisis

If you live in the United States, you've almost certainly seen your housing costs dramatically rise over the last several years, had a harder time finding home insurance,[1] and, if you filed a claim, you were almost as likely to see it denied as paid out,[2] let alone delayed or underpaid.[3]

Property and casualty insurance companies blame climate-driven extreme weather for rising prices and falling quality. While such disasters are certainly part of the problem, Public Citizen, partner organizations, and independent ratings agencies have reported on the industry's historic profits,[4] historic executive compensation,[5] billion dollar advertising wars,[6] and regulatory capture[7] that most certainly factor into these soaring rates.

The insurance industry claims that its competitive marketplace and price signals provide consumers valuable information about where to live and which policies to purchase to minimize their risks, minimize their costs, and maximize the value they receive from their property insurance.

However the public, researchers, and regulators themselves were blind[8] to how the most basic insurance metrics varied from place to place until late 2024 and early 2025, when

[1] "Average premium per policy increased across every NAIC region since 2018, with inflation-adjusted increases ranging from 18.3% to 43.3%." Notably, these figures are only for those who can still find coverage in the traditional market. The NAIC also reports that "during the same period, company-initiated non-renewal rates increased between 96% and 216%." Those homeowners may have then either gone without insurance, as is the case for many lower income heirs property owners, or turned to state administered FAIR plans which provide more limited coverage at even higher costs in the 33 states and District of Columbia which offer them. https://content.naic.org/article/naic-releases-first-its-kind-national-analysis-homeowners-insurance-market-trends

[2] https://weissratings.com/en/weiss-news/14-large-u-s-insurers-closed-nearly-half-of-homeowner-claims-with-no-payment-in-2024

[3] https://consumerfed.org/news/press-releases/new-analysis-homeowners-insurance-companies-earn-millions-in-interest-and-investment-income-with-every-day-of-claim-delay/

[4] https://www.citizen.org/article/insurers-score-record-profits-while-consumers-pay/

[5] *Ibid.*

[6] https://www.spglobal.com/market-intelligence/en/news-insights/articles/2025/3/progressives-advertising-expenditure-hits-record-high-in-2024-88020488

[7] https://insurancenewsnet.com/innarticle/switching-sides-many-ex-insurance-commissioners-go-straight-to-industry-roles

[8] https://scholarship.law.umn.edu/cgi/viewcontent.cgi?article=1582&context=faculty_articles

data released by Treasury's Federal Insurance Office (FIO)[9] and the Senate Budget Committee[10] provided a long-awaited window into the insurance crisis.[11]

That data call proceeded despite the intense opposition of more than half of the state insurance commissioners.[12]

Methodology

In early July 2026, just ahead of the data collection deadline, Public Citizen contacted all 56 state and territorial insurance commissioners/offices.

We utilized the state insurance commissioner tracker maintained by the Revolving Door Project,[13] as the NAIC does not maintain a complete public list of insurance commissioner contacts, nor do all of the insurance commissioner offices provide contact information.

Our outreach included an initial email, three follow-up emails, and attempted phone contact. When we received out of office messages, bounced emails, or were redirected to other state offices, we followed up with different staff members' emails, a phone call, and reached out after the date indicated by the out of office messages.

We asked each insurance commissioner the following three questions:

1. Is your department participating in the NAIC's ongoing homeowners market data call?
2. Does your department support the NAIC publishing homeowners market data at the ZIP-code level?
3. Does your department plan to publish ZIP-code-level homeowners market data for your state or territory, regardless of whether the NAIC publishes it nationally?

We then categorized the commissioners' responses to each question as follows:

- Yes: The office responded affirmatively.
- Maybe: The office provided a conditional response or its position remains uncertain.

[9] https://home.treasury.gov/news/press-releases/jy2791
[10] https://www.budget.senate.gov/chairman/newsroom/press/budget-committee-releases-sweeping-new-report-highlighting-economic-budgetary-costs-of-climate-change
[11] https://www.citizen.org/article/mapping-the-home-insurance-crisis/
[12] https://therevolvingdoorproject.org/mapping-the-home-insurance-crisis-anti-fio-states/
[13] https://therevolvingdoorproject.org/tracking-state-insurance-commissioners/

- No Response: The office did not answer the question.

As a number of commissioners replied in some way to our outreach, but did not answer any questions, we categorized the commissioners' reply to our outreach as follows:

- Yes: The office responded to at least one question.
- Inconclusive: The office responded to our outreach, but did not address any of our questions.
- No: The office did not respond to our outreach.

Findings

Of the 56 state and territorial insurance commissioners we surveyed, 23 responded in some way. Of those, 5 offices replied to our emails but did not address the questions and 18 responded to our inquiries. Their responses are summarized in the table below.

Table 1: Summary of Insurance Commissioner Responses

State/Territory	Commissioner	Replied	Q1: Participating?	Q2: Supports the NAIC publishing zip-code level data?	Q3: Plans to publish state zip-code level data?
Arizona	Director Charles "Chuck" Bassett	Yes	Yes	No Response	No Response
Colorado	Commissioner Michael Conway	Yes	Yes	No Response	Maybe
Connecticut	Commissioner Joshua Hershman	Yes	Yes	Yes	Yes
District of Columbia	Commissioner Karima Woods	Yes	Yes	No Response	Yes
Guam	Commissioner Michelle B. Santos	Yes	No	Yes	No
Iowa	Commissioner Doug Ommen	Yes	Maybe	No Response	No Response
Kentucky	Commissioner Sharon Clark	Yes	No Response	No Response	No Response
Maryland	Commissioner Marie Grant	Yes	Yes	No Response	No Response
Massachusetts	Commissioner Michael Caljouw	Yes	Yes	No Response	Yes
Minnesota	Commissioner Grace Arnold	Yes	Yes	Maybe	Maybe
Mississippi	Commissioner Mike Chaney	Yes	Yes	Yes	Yes

Missouri	Director Angela Nelson	Yes	Yes	Maybe	Maybe
New Mexico	Superintendent Alice Kane	Yes	Yes	Yes	No
North Dakota	Commissioner Jon Godfread	Yes	Yes	Maybe	Maybe
Ohio	Director Judith French	Yes	No Response	No Response	No Response
Pennsylvania	Commissioner Michael Humphreys	Yes	Yes	No Response	No Response
Texas	Commissioner Amanda Crawford	Yes	Yes	Yes	Yes
Vermont	Commissioner Kaj Samson	Yes	Yes	No Response	No Response
Illinois	Director Ann Gillespie	Inconclusive			
Indiana	Commissioner Holly Lambert	Inconclusive			
Nevada	Commissioner Ned Gaines	Inconclusive			
Oregon	Commissioner TK Keen	Inconclusive			
Puerto Rico	Commissioner Suzette M. Del Valle	Inconclusive			
Alabama	Commissioner Mark Fowler	No			
Alaska	Director Heather Carpenter	No			
American Samoa	Commissioner Peter Fuimaono	No			
Arkansas	Commissioner Jimmy Harris	No			
California	Commissioner Ricardo Lara	No			
Delaware	Commissioner Trinidad Navarro	No			
Florida	Commissioner Michael Yaworsky	No			
Georgia	Commissioner John King	No			
Hawaii	Commissioner Scott Saiki	No			
Idaho	Director Dean Cameron	No			
Kansas	Commissioner Vicki Schmidt	No			

Louisiana	Commissioner Tim Temple	No			
Maine	Superintendent Robert Carey	No			
Michigan	Commissioner Anita Fox	No			
Montana	Commissioner James Brown	No			
Nebraska	Director Eric Dunning	No			
New Hampshire	Commissioner D.J. Bettencourt	No			
New Jersey	Commissioner Susan Ochs	No			
New York	Superintendent Kaitlin Asrow	No			
North Carolina	Commissioner Mike Causey	No			
Northern Mariana Islands	Secretary Remedio C. Mafnas	No			
Oklahoma	Commissioner Glen Mulready	No			
Rhode Island	Superintendent Elizabeth Dwyer	No			
South Carolina	Director Michael Wise	No			
South Dakota	Director Larry Deiter	No			
Tennessee	Commissioner Carter Lawrence	No			
U.S. Virgin Islands	Lieutenant Governor Tregenza Roach	No			
Utah	Commissioner Jon Pike	No			
Virginia	Commissioner Scott White	No			
Washington	Commissioner Patty Kuderer	No			
West Virginia	Commissioner Erin Hunter	No			
Wisconsin	Commissioner Nathan Houdek	No			
Wyoming	Commissioner Jeff Rude	No			

Finding One: Most Commissioners Who Answered Are Participating

Among offices that answered question 1, 78% (14 out of 18) affirmed that they are participating in the homeowners market data call.

Finding Two: Capacity Challenges Limit Participation and Oversight

The Guam Insurance Commissioner Michelle B. Santos stands out as the singular respondent who is not participating in the homeowners market data call. While Commissioner Santos responded that she would like to participate in the data call and supports the NAIC publishing zip-code level data, she stated that her office's capacity prevents their participation.

Commissioner Santos's predicament reflects a broader problem of insurance commissioner office capacity documented by the Revolving Door Project.

> **1. Is your department participating in the NAIC's ongoing homeowners market data call?**
>
> ***"No. We are short handed with staff and cannot do so at this time."***
>
> **-Guam Insurance Commissioner Michelle B. Santos**

As Kenny Stancil, deputy research director at the Revolving Door Project, notes,

"Staffing and budgets also vary between [state insurance commissioner] jurisdictions. This is a key issue because **without sufficient resources, it's impossible for state-level insurance offices to adequately oversee the powerful financial institutions they've been tasked with regulating**."[14]

Research conducted by the Revolving Door Project shows that state insurance departments have dramatically different staffing levels and regulatory capacities. California employs 1,398 department staff who regulate 1441 insurance companies, a near 1:1 ratio, while Wyoming's 26 insurance department staff are responsible for overseeing 1485 insurance companies.

In a decentralized regulatory system wherein each state and territory are responsible for overseeing and reporting on their own insurance market, uneven regulatory capacity makes nationwide insurance data transparency even more important. A regulator with limited staff may struggle to collect, analyze, and publish market data even when it recognizes the value of doing so. Public access to standardized, granular data can help

[14] https://therevolvingdoorproject.org/mapping-home-insurance-regulation/

When regulatory capacity varies dramatically from one jurisdiction to another, data transparency can depend solely on the resources of individual insurance departments.

compensate for these uneven resources by allowing consumers, researchers, journalists, and policymakers to independently assess insurance markets.

Finding Three: Most Regulators Are Unwilling to Talk About Transparency

A striking contrast emerged in the insurance commissioners' responses. While 78% said their states will participate in the data call, their commitment to data transparency was much less clear.

Most respondents did not directly answer Question 2: "Does your department support the NAIC publishing homeowners market data at the ZIP-code level?"

While some (28%) of respondents replied that they did support the NAIC publishing zip-code level data, most offices either did not address the question (56%), or replied that their support depended on the NAIC's forthcoming recommendations (17%).

The Arizona Department of Insurance was one of several offices that noted the need for company confidentiality. This insistence echoes how the insurance industry consistently uses a "trade secrets" defense against demands for information.

2: Do you support the NAIC publishing zip-code level data?

"I will refer you to the NAIC Homeowners Market Report Working Group for any questions on this issue."

-Kentucky Insurance Commissioner Sharon Clark

The Kentucky and Missouri insurance commissioners' replies reveal a divide in the level of deference the commissioners give to the NAIC. Kentucky Commissioner Clark's brief response directing us to the NAIC was echoed by several offices. On the other hand, Missouri Commissioner Nelson's assertion of state sovereignty over the NAIC and the data call was also echoed by a number of offices.

States such as Missouri that make zip-code level data available upon request create a serious hurdle for consumer understanding of their state insurance markets. In these states, the insurance commissioner acts as a gatekeeper of information desperately needed by the public to navigate an opaque and confusing industry, and by researchers, lawmakers, and advocates to understand larger trends in the market.

On the other hand, states such as Connecticut, the insurance capital of the country, Mississippi, and Texas offered full throated support of national data transparency.

> ***". . .[T]he questions appear to assume that the data call is being initiated by the NAIC. I want to clarify that this data call is a collaborative effort among states, facilitated by the NAIC. But, at least as to specific Missouri data, the data call was initiated by and is being conducted under Missouri law and the responsive data will be handled accordingly."***
>
> **-Missouri Insurance Commissioner Angela Nelson**

Texas's position represents a tide shift from one insurance commissioner's tenure to the next. The former commissioner lobbied against and refused to participate in the previous data call. Under the current commissioner, Texas publishes homeowners insurance information through a user-friendly interactive map at the county-level of granularity.[15]

Similarly, Massachusetts has published much of the data currently being collected at the zip-code level for decades.[16]

These states prove that collecting and publishing such information is possible, but that the decision is often left to the whims of an individual state regulator.

> Missouri ZIP Code Insurance Data for homeowners/dwelling fire, farm owners, mobile Home, earthquake and private passenger automobile
>
> Missouri law requires insurers writing personal lines insurance to file data by ZIP code, including exposures written, premium written, loss paid count and losses paid. Data is collected on an annual basis and the department of Insurance compiles a sophisticated database of ZIP code information. Aggregate data (non-company specific) is available to the public by exposures written, premium written, number of losses and losses paid. Please email Brad Gerling at **statistics@insurance.mo.gov** to place your request.

Finding Four: Consequences of the Uneven Regulatory Landscape

Consumers have vastly different access to information depending on where they live in the country. If someone in Texas wanted to move to where the insurance market was safest, with the lowest average premiums and fewest nonrenewals, they could easily refer

[15] https://www.tdi.texas.gov/general/texas-homeowners-insurance-market-overview.html
[16] https://www.mass.gov/info-details/the-commissioners-report-on-home-insurance

to the state's insurance map. Someone in Massachusetts could find similar information, but they would have to wade through a few hundred pages of the Statistical Supplement to the Annual Home Insurance Report to do so.

Meanwhile, in most of the country, consumers have little to no recourse to such information outside of the few years (and already outdated) of data captured and published by FIO and SBC, and which was subsequently mapped by Public Citizen and the Revolving Door Project.[17]

As a result, most people cannot use property insurance data to inform their decision about where to live to minimize the risks they face or the costs they incur.

Such an uneven regulatory landscape provides opportunity for regulatory arbitrage. Anecdotally, legislators and insurance commissioners in numerous states have told Public Citizen that insurance companies have threatened to abandon their state if they impose new rules. As a result, 16 states lack even basic regulations such as the NAIC's Unfair Property/Casualty Claims Settlement Practices Model Regulation.[18] When consumers face different basic definitions of fairness across state insurance markets, the industry enjoys a race to the bottom of what it is expected to pay out when disaster strikes. This phenomenon has been described at length by legal scholar Jay M. Feinmann in his now infamous book, Delay Deny Defend: Why Insurance Companies Don't Pay Claims and What You Can Do About It.

Ratings agencies and the industry's financials confirm Feinmann's thesis. Weiss Ratings, the nation's only independent insurance company rating agency, revealed that in 2024, 13 large U.S. property insurers flatly denied 40% to 70% of the 3.9 million homeowner claims from the previous year.[19]

The trend has continued, with Weiss reporting that "15 large U.S. insurers, including State Farm of Florida and other State Farm subsidiaries, flat-out denied at least 50% of homeowner and farmowner claims in 2025."[20] The reason for such delays and denials is plain: for just a single day of merely delayed claims, homeowners insurance companies collectively take in an extra $8.8 million in interest and investment income.[21] Due in no

[17] See: https://www.citizen.org/article/mapping-the-home-insurance-crisis/

[18] See the model regulation here: https://content.naic.org/sites/default/files/model-law-902.pdf States that lack this regulation: CT, HI, ID, IN, IA, ME, MA, MI, MS, MT, NM, ND, SD, SC, WI, WY. (Unpublished research from Americans for Financial Reform, courtesy of Alex Martin.)

[19] https://weissratings.com/en/weiss-ratings-daily/homeowners-beware-big-insurers-deny-half-of-damage-claims

[20] https://weissratings.com/en/weiss-news/15-large-u-s-insurers-denied-more-than-half-of-homeowner-claims-in-2025

[21] https://consumerfed.org/news/press-releases/new-analysis-homeowners-insurance-companies-earn-millions-in-interest-and-investment-income-with-every-day-of-claim-delay/

small part to these practices, the industry's investment and underwriting profits have surged to historic highs in recent years.[22]

> **An opaque and fragmented market is one in which fraud is only a matter of time.**

It looks that the property and casualty industry may have overplayed its hand of late. In just this current year, the California Department of Insurance poised to issue the highest penalty in its history against State Farm for its treatment of survivors of the 2025 Los Angeles Wildfires,[23] the Oklahoma Attorney General has sued State Farm and Allstate for unjustly denying or underpaying wind- and hail-related claims in systematic racketeering schemes engineered to defraud policyholders whose roofs were damaged during severe storms,[24] and a class action and racketeering lawsuit is being investigated by the American Policy Holders Institute against the Texas Windstorm Insurance Association, the insurer of last resort composed of every traditional private property insurer in the state.[25]

An opaque and fragmented market is a market in which fraud is only a matter of time.

Finding Five: Data Silos Impede Consumer Protection

While insurance is regulated at the state level, climate-driven extreme weather disasters and property insurance disruptions don't stop at state borders.

A fragmented data environment makes it difficult to identify regional patterns, affordability trends, geographic disparities, and illegal cross-state market subsidization (that is, consumers in low regulation states subsidizing consumers in high regulation states). In an attempt to protect the residents of Illinois, Attorney General Kwame Raoul is suing State Farm in order to uncover the very information inquired about by this survey and which is required to be disclosed by state law.[26]

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[22] https://www.citizen.org/article/insurers-score-record-profits-while-consumers-pay/
[23] https://www.insurance.ca.gov/0400-news/0100-press-releases/2026/release019-2026.cfm
[24] https://prospect.org/2026/08/26/cracking-down-on-big-insurance-in-oklahoma/
[25] https://www.houstonchronicle.com/politics/texas/article/twia-hurricane-beryl-lawsuit-22393410.php
[26] https://illinoisattorneygeneral.gov/news/story/attorney-general-raoul-sues-to-force-state-farm-to-turn-over-homeowners-insurance-data-to-illinois-department-of-insurance

Finding Six: Most States Have a De Facto Noncompetitive Home Insurance Market

This lack of transparent and accessible data undermines the basis of insurance regulation: that a competitive state insurance market is the principle foundation of consumer protections and the most important concern for state regulators.

It is worth quoting the full opening sentences of the NAIC's mission statement:

> **"Our members are state insurance regulators from diverse backgrounds—but are united in their shared commitment to set standards and ensure fair, *competitive*, and healthy insurance markets to protect consumers. The singular mission of the NAIC is to support our members in these noble causes [emphasis by Public Citizen].**
>
> - NAIC Mission Statement

It is impossible for insurance companies to compete for consumers' business when those consumers lack basic information by which to compare insurers. What could those companies possibly be competing on? Why would a company lower its premiums, discount home and community resilience improvements, pay claims more quickly and reliably, or even provide responsive service when a consumer has no way of seeing it?

When consumers lack information to allow them to make an educated choice between insurance companies, a state insurance market simply cannot be competitive. Such a lack of consumer information in the majority of states indicates that many insurance commissioner offices have failed at their self-described primary job for decades.

Policy Recommendations

The United States Needs an Ongoing, Granular, and Publicly Accessible Data Set on Homeowners Insurance

State insurance regulators and the NAIC can take steps to ameliorate opaque and noncompetitive markets by the following:

1. Publish homeowners insurance average premiums, losses, deductibles, nonrenewal notices and mitigation discounts by year, ZIP code and policy type (home, renter, condominium or mobile home).

2. Update the data regularly rather than treating the data call as a one-time exercise.
3. Fix the capacity limitation by either increasing industry fees to cover adequate regulatory oversight, working with partner states with large enough offices to share capacity, or creating a capacity sharing mechanism through the NAIC to ensure this crucial information is available to everyone everywhere in the country.
4. Create pathways for public access to insurance regulators beyond consumer complaints at state insurance offices and the NAIC's consumer representative role. People should have access to their state regulator whose office plays an increasingly outsized role in their lives as rates climb and coverage dwindles.
5. Expand the definition of a competitive state insurance market to include consumer access to information on average premiums, losses, deductibles, nonrenewal notices and mitigation discounts by year, ZIP code and policy type (home, renter, condominium or mobile home).

Conclusion: The Public Has a Right to See the Data

Ongoing, granular, and publicly accessible information can help homeowners and renters by making insurance companies compete for their business, by informing their decisions about where to live, and by allowing regulators, lawmakers, academics, and consumer advocates to work on their behalf.

Without access to such information, consumers are left vulnerable to being grossly overcharged[27] and their valid claims are delayed, denied, and underpaid, all while property and casualty insurance companies enjoy historic profits, funnel our money to CEOs and shareholders,[28] and engage in billion dollar advertising wars.[29]

It is wildly irresponsible for the whims of individual state insurance commissioners to determine whether this information is collected or is accessible to the public. While for the subset of insurance commissioners who responded to our survey, the majority are collecting this information. It remains to be seen whether their peers will participate in the data call, and whether the insurance commissioners themselves will be able to see the data

[27] https://apnews.com/article/insurance-regulations-housing-costs-trump-affordability-0b70d9a4131a0772f2771b155400cd5a
[28] https://www.citizen.org/article/home-insurance-executives-are-raking-it-in-at-your-expense/
[29] https://revolvingdoorproject.substack.com/p/dont-let-home-insurers-fool-you-theyre

beyond their states' borders, and to what extent the rest of us will be able to access the information.

Consumers should not have to rely on industry talking points, anecdotes, or incomplete data to compare companies and to understand whether insurance markets are functioning in their states. If regulators believe that competition protects consumers, they must ensure people have the information necessary to make informed choices. The public should not trust an industry it cannot see.