OregonConsumerLeague

October 17, 2025

Sent via email: Scott Kluempke scott.d.kluempke@dcbs.oregon.gov ;Karen Winkel, Karen.J.WINKEL@dcbs.oregon.gov

Thank you for the opportunity to provide feedback on the draft rule related to HB 2563 (2025) insurance notices discussed at the October 8, 2025, RAC meeting. During the rulemaking discussion, the Oregon Consumer League expressed concern about the lack of clarity regarding responding to insureds in circumstances where the insurer finds (in the course of researching the policy premium increase to respond to a written request) that there is an error that resulted in the insurance premium increase. Currently the draft rule does not address a requirement to respond in writing if there is an error. We request that the rule include clarification that an insurer must inform the insured in writing if there is an error in the premium increase factors and that the error will be corrected.

Additionally, there was discussion regarding the data collection requirements. We urge DCBS to consider collecting the actual number of written requests received, not limited to percentages.

Thank you for considering our comments on HB 2563.

Sincerely,

Michelle Druce
Executive Director
Oregon Consumer League