October 23, 2025

RE: Insurance Notices Rulemaking Advisory Committee (HB 2563)

On behalf of Professional Insurance Agents of Oregon (PIA/O), thank you for the opportunity to provide comment on the proposed rule regarding insurance premium change notices.

PIA/O represents independent insurance agents across the state who work directly with consumers to help them understand coverage options, policy changes, and premium adjustments. Our members are often the first point of contact for consumers when they receive a premium change notice and have questions or concerns about the reasons behind it.

Producers play an essential role in helping consumers interpret these notices, explain coverage impacts, and explore available options. Including producers in the notification process ensures that consumers receive timely, accurate information from the professionals they trust most with their insurance decisions. When agents are not included in these communications, consumers often turn to them without the context or details needed to provide immediate assistance, which creates confusion, delays, and unnecessary frustration for everyone involved.

In the current rule language, specifically within the "Premium Change Notice" section, subsection (2) states: "*An insurance premium change notice shall contain the following format and contents, or something substantially similar*." Our understanding is that the phrase "*something substantially similar*" does not prohibit carriers from including producers in the contact information of the formatted notice. We believe this flexibility is both intentional and appropriate, as it allows insurers to meet the rule's intent of consistency and clarity while maintaining the ability to communicate with producers, who serve as an indispensable bridge between consumers and carriers.

We respectfully request that DCBS affirm in the final rule or accompanying guidance that carriers maintain the ability to include producers in any "*substantially similar*" formatted notice. This clarification will help preserve the valuable producer-consumer relationship, reduce consumer confusion, and promote better service outcomes, particularly at a time when premium increases are a sensitive and important issue for many Oregonians.

Thank you for your attention to this issue and for continuing to include stakeholders in this important discussion.

Sincerely,

Isis Thornton-Saunders
On Behalf of Professional Insurance Agents of Oregon (PIA/O)

Delivered via email to scott.d.kluempke@dcbs.oregon.gov and Karen.J.Winkel@dcbs.oregon.gov