OregonConsumerLeague

November 13, 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 additional feedback on the draft rule related to HB 2563 (2025) insurance notices discussed at the November 6, 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 timely, and in writing, if there is an error. We request that the rule include clarification that an insurer must timely inform the insured in writing of an error in the premium increase factors that impacted the premium increase. The following draft is submitted for consideration:

5. If no individual rating factors are identified by the insurer as significantly contributing to an insured's premium increase due to an error, the insurer must provide a clear and reasonable explanation to the policyholder regarding the error that contributed to the increase in their premium.

Additionally, there was further discussion regarding the data collection requirements. We support DCBS' efforts to gather data to determine additional information regarding the premium increase related to qualified policies. This information will assist in further review of the potential impact of the original draft of HB 2563 which would have required proactive notices to consumers who experienced premium increases rather than requiring consumers to request in writing the reasons for premium increases. We continue to recommend that DCBS collect the actual number of written requests received as this number provides important information regarding consumer impact related to insurance premium increases. Thank you for considering our comments on HB 2563.

Sincerely,

Michelle Druce
Executive Director
Oregon Consumer League