Oregon Consumer Justice
3055 NW Yeon Avenue, #1336
Portland, OR 97210
(503) 406-3311

November 14, 2025

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

Thank you for giving Oregon Consumer Justice (OCJ) the opportunity to provide feedback on the draft rule related to HB 2563 (2025) insurance notices discussed at the November 6, 2025, RAC meeting.

During the meeting, insurance premium increases resulting from the insurance company's error were discussed, along with concerns about the lack of language requiring the insurance company to inform a consumer of an error in writing. OCJ shares these concerns and would support adding a section that clarifies the insurer's responsibility to proactively notify the customer of the reason for the increase due to an error, thereby enabling the insured to be informed and make educated financial decisions regarding their insurance coverage.

Additionally, data collection requirements were discussed, including collecting the number of written requests received by the insurer. We encourage DCBS to gather this data and capture this requirement in the language of HB 2563, as this vital information can be used to track the impact of insurance premium increases on consumers and help guide future industry practices.

Thank you for considering these comments on HB 2563.

Regards,

Angela Donley, MSW
State Policy Director