

NATIONAL ASSOCIATION OF PUBLIC INSURANCE ADJUSTERS

PRESIDENT

JUSTIN SKIPTON, AIC, SPPA
8710 E. Vista Bonita Drive
Scottsdale, AZ 85255
justin@skiptoninc.com

FIRST VICE PRESIDENT

ROBERT JOSLIN, CPPA
437 Liholiho Street
Wailuku, Maui, HI 96793
rh.joslin@hawaiiadjuster.com

SECOND VICE PRESIDENT

ALICE YOUNG, AIC, SPPA
220 SE 19th Street, Suite B
Moore, OK 73160
alice@brown-ohaver.com

THIRD VICE PRESIDENT

TIM WOODARD, SPPA, CPPA
3001 Dallas Parkway, Suite 520
Frisco, TX 75034
tim@eclipseclaims.com

FOURTH VICE PRESIDENT

RAYMOND ALTIERI, III
400 N. Tampa Street, Suite 1850
Tampa, FL 33602
ray3@altieradjusters.com

TREASURER

BRIAN EVANS, AIC, SPPA
697 Third Avenue, Ste. 406
New York, NY 10017
brian@easternpublic.com

SECRETARY

BLAIR RYAN
3355 Bee Caves Rd., Suite 103
Austin, TX 78746
blair@benkeai.com

DIRECTORS

CHRIS ALDRICH
217 Washington Street
Toms River, NJ 08753

TAYLOR BABB
6947 COAL CREEK PKWY SE
UNIT 345
NEWCASTLE, WA 98059

MATTHEW BLUMKIN, ESQ.
9301 Corbin Avenue, Suite 2100
Northridge, CA 91324

BRETT COHEN
510 BELMONT AVE.
BALA CYNWYD, PA 19004

DANIELLE LEVIN GABBARD
400 GALLERIA OFFICENTRE
SUITE 101
SOUTHFIELD, MI 48034

STACI GOODMAN
275 MADISON AVENUE, SUITE 2218
NEW YORK, NY 10016

ANDREW KNOX, SPPA
400 N. Tampa Street, Suite 1850
TAMPA, FL 33602

STEPHANIE LEE, AIC, SPPA
417 W 18th St, Suite 102
EDMOND, OK 73013

CLAY MORRISON, CPPA, CPAU
2951 MARINA BAY DR #130-315
LEAGUE CITY, TX 77573

KATHERINE PAPA
1 NFA PARK
AMHERST, NY 14228

JAESON TAYLOR, ESQ.
6000 LOMBARD CENTER, SUITE 600
CLEVELAND, OH 44131

BENNY WRIGHT
9314 Forest Hill Blvd. Suite 43
Wellington, FL 33411

COUNSEL

BRIAN GOODMAN, ESQ.
9199 Reisterstown Road, Suite 213C
Owings Mills, MD 21117
410-600-3755
brian@goodmanlawgroupllc.com

EXECUTIVE DIRECTOR

GJERGJ NDOJA
1400 Village Square Blvd
Suite 3 #187 32312
703-433-9217
gjergj@napia.com



June 27, 2025

Ms. Karen Winkel, Rules Coordinator

350 Winter St. NE

Salem, OR 97301

Via email at dfr.rules@dcbs.oregon.gov

Re rule changes proposed 836-071-1100 – 836-071-1195

Dear Ms. Winkel,

I am writing on behalf of the National Association of Public Insurance Adjusters (“NAPIA”). NAPIA was founded 75 years ago in 1951 to advance the profession for those directly representing and assisting consumers on insurance claims involving property loss, whether business loss or personal property such as homes. NAPIA members are committed to education, certification, ethics, and professional excellence in the profession of public adjusting. The ethics statement for the association is even codified in the NAIC model. We refer to it as the gold standard for public adjusting. I write to you today as President of NAPIA, in support of proposed changes to the regulations relating to public adjuster licensing in Oregon. We believe that distinguishing between public adjusters and independent adjusters will be beneficial to Oregon policyholders and reduce confusion at the time of a property loss. This is long overdue.

NAPIA would also like to advocate for three changes to the proposed rules:

1. Where 836-071-1165 (7) reads “The insurer shall verify the public adjuster holds a valid license...” we would propose amending the rule to read “The insurer shall verify the public adjuster or those acting as public adjusters hold a valid license...”. This change will pick up contractors and others attempting to act as a public adjuster, ensuring the person(s) engaged in the activity is properly licensed.
2. Where 836-071-1185 (10)(c) notes a licensed public adjuster may not represent or act as a company adjuster or be an independent adjuster on the same claim, NAPIA would propose removing “on the same claim”. This will better protect Oregon consumers by ensuring a public adjuster cannot experience a conflict of interest if employed by their insurer as an independent adjuster on different claims.
3. Clarification on whether a current exception to obtain a license to engage in business as an adjuster in ORS 744.515(2)(j) to “a person that provides, without compensation, an estimate for repairs that the person will perform, even if the person receives compensation for the repairs under the claim” will continue to be apply. NAPIA believes this exception is contradictory to the new rules being proposed.

Again, we thank you for working toward reducing confusion in the claims process and believe these proposed rule changes will improve protections for policyholders.

Sincerely,

A handwritten signature in black ink that reads 'Justin R Skipton'.

Justin R. Skipton, AIC, SPPA,
NAPIA President 2025-2026