Rules coordinator (policy)

Reference #	12040133
Status	Complete
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Rule number/topic	R 2021-07
Comment(s) or question(s)	A permanent rule temporarily banning the use of insurance-based credit scoring as a factor for determining premiums for insurance policies for three years will make auto, home, and rental insurance unaffordable for seniors and others on fixed incomes. Banning the use of insurance-based credit scoring will have the effect of discriminating against seniors and others on fixed incomes by causing their premiums for auto, home, and rental insurance to increase by 15 - 20% for no other reason than the imposition of this ban. The ban on using insurance-based credit scoring punishes people who pay their bills and have good credit. If the Insurance Commissioner feels that insurance companies can make other adjustments to mitigate the negative effects of this ban, then he should work with insurance companies to achieve these mitigations before carelessly implementing a ban that will have immediate, negative, discriminatory effects on good, longtime insurance customers. According to the notice I received from my auto insurance carrier, my premium for the first six

months of 2022 has increased 20% over my		
premium for the last six months of 2021 - for no		
reason other than the loss of a deduction for		
good credit. Implementing a ban on using		
insurance-based credit scoring in determining		
premiums doesn't solve any problems. It simply		
shifts the burden of payment for claims onto the		
shoulders of seniors and others on fixed		
incomes in a manner that is neither		

... reasonable nor equitable.

Conflating the economic effects of the COVID-19 pandemic with the projected effects of continuing to use insurance-based credit scoring as one factor in determining insurance premiums in order to justify an emergency rule banning the use of said insurance-based credit scoring is an egregious example of fear-based reasoning. This proposed emergency rule has neither the approval of the state legislature nor the state's voters.

"Consumers deserve better," Insurance Commissioner Mike Kreidler stated in a news release from his office dated Oct. 19, 2021. I agree.

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