



NW Insurance Council



NAMIC
NATIONAL ASSOCIATION OF
MUTUAL INSURANCE COMPANIES



**American Property Casualty
Insurance Association**
INSURING AMERICA apci.org

September 28, 2025

Insurance Commissioner Patty Kuderer

Cc: Rules Coordinator

Office of the Insurance Commissioner

Olympia, WA 98504

Re: R-2025-04 - P&C Trades Comments to Prepublication Draft

Sent via email

Dear Commissioner Kuderer,

On behalf of our insurance company members, who collectively underwrite the vast majority of personal and commercial lines vehicle and property insurance policies in force in Washington state today, our associations – the **American Property & Casualty Insurance Association (APCIA)** the **Northwest Insurance Council (NWIC)**, and the **National Association of Mutual Insurance Companies (NAMIC)** respectfully submit the following comments and recommendations regarding the prepublication draft of rules implementing **SSB 5721** (auto appraisal clauses in insurance policies).

The trades have received comment from our members with two suggestions:

1. Consider removing the prerequisite in subsection (2)(b) that requires a minimum of five times serving on an appraisal panel as an umpire prior to qualifying to serve as a registered umpire. This restricts the potential pool of appraisers and makes it more difficult for new appraisers to access the opportunity to serve as an umpire.
2. In subsection (2)(c)(ii)(A), the draft rule includes an educational requirement of “a professional certificate from...The Inter-Industry Conference on Auto Collision Repair (I-CAR)”. We are informed that I-CAR may award a certificate for each individual class, so this requirement may not serve to ensure that an appraiser has sufficient education to serve as an umpire. We suggest that an appraiser achieve and maintain **I-CAR Platinum status** as an educational requirement to serve as an umpire.

We would also like to register our concern that the prepublication draft references **instructions** posted on the OIC website to register as an umpire as well as to fill out the referenced attestation form; but those instructions, to our knowledge, are not presently available for review. Our comments in response to the prepublication draft are therefore incomplete, and we hope the OIC will be able to share the proposed instructions along with a revised draft rule in the near future.

Thank you for initiating this prepublication process and seeking input from interested parties as you develop the rules to implement SSB 5721. We look forward to receiving additional information as it becomes available.

Respectfully submitted,

Mark Sektnan

VP, State Gov’t Relations

APCIA

916.449.1370

mark.sektnan@apci.org

Kenton Brine

President

NWIC

360.481.6539

kenton.brine@nwinsurance.org

Brandon Vick

VP, State Gov’t Relations

Pacific NW Region, NAMIC

360.609.4363

bvick@namic.org