



**Kara Cross**  
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October 23, 2025

David Forte  
Senior Policy Advisor  
Office of the Insurance Commissioner  
302 Sid Snyder Ave., SW, Olympia WA 98504

Re: Proposed changes to WAC 284-20-010 Standard fire policies

Dear Mr. Forte:

Verisk/Insurance Services Office, Inc. (ISO) thanks you for the opportunity to provide comments regarding rulemaking for the implementation of SSB 5419, 69<sup>th</sup> Legis. Sess. (Wash. 2025). Verisk has four main divisions: Underwriting Solutions, Claims Solutions, Extreme Event Solutions and Specialty Business Solutions.

Prior to the enactment of SSB 5419, 69<sup>th</sup> Legis. Sess. (Wash. 2025), the Chief of the Washington State Patrol, Director of Fire Protection confirmed fire losses reported to ISO ClaimSearch® by participating insurers satisfied the reporting requirement for WASH. REV. CODE § 48.05.320. The Department has posted on its website and also put in the Instructions for Fire Loss Reporting “Authorized insurers already reporting to ISO ClaimSearch® fulfill the fire loss reporting requirements in RCW 48.05.320. These authorized insurers do NOT need to separately report to the OIC.” We appreciate the Department’s recognition of the ISO ClaimSearch® dashboard as a solution for compliance for insurers reporting to ClaimSearch®.

However, we believe it is important to specify in the regulation carriers reporting to an authorized insurance claim data collection organization (ISO ClaimSearch®) fulfill the fire loss reporting requirements in WASH. REV. CODE § 48.05.320. The rulemaking will serve as a permanent record that will provide necessary clarification. Since the instruction document is outside of the formal rulemaking process, it could be changed in the future. Having the information in the formal regulations will ensure certainty on how it will be interpreted.

Please feel free to reach out to me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kara Cross", written in a cursive style.

Kara Cross