

## 2023 CATASTROPHE REPORTING FORM

## **Frequently Asked Questions**

The Florida Office of Insurance Regulation (OIR) has released the 2023 Catastrophe Reporting Form (CRF), located here.

The CRF provides valuable information to OIR and the state of Florida regarding the impact of a hurricane or other event, including the scope of the total insured loss and impact to insurance consumers. It is critical that data is submitted is timely and accurately.

As an additional resource for insurers, OIR has compiled the following list of frequently asked questions.

#### Frequently Asked Questions

## Q: Can I make amendments to a CRF that has already been submitted through the Insurance Regulation Filing System (IRFS), or do I need to create a new filing?

A: If a company needs to make a change to a CRF that has already been submitted, the company must create a new filing in IRFS, and re-submit with the correct data. The reporting process always pulls the most recent submission for each company. Call OIR's Market Research & Technology Unit at 850-413-3147 if the company wants to "error out" a filing.

## Q: If my company does not have any Florida policies in force or claims for the identified lines of business within the CRF to report for the event, is the company required to submit a filing or continue to submit a filing?

A: If the company does not have any Florida policies in force for the identified lines of business within the CRF to report for the event, the company must submit a "No Data" filing in IRFS by the Filing Deadline listed in the data call notice but only for the initial reporting period. If the company does not have any Florida claims for the identified lines of business within the CRF to report for the event, the company must submit a "No Data" filing in IRFS only for the initial reporting period. However, companies must begin filing "Data" filings once claims are received.

#### Q: IRFS will not allow my company to upload a CRF. Please help?

A: Before uploading the CRF, ensure that all validations on every tab are marked as "TRUE," otherwise, IRFS will not allow the CRF to be uploaded. The validation will specify which fields are invalid that require correction.

#### Q: Must my company file for each deadline?

A: Yes. If the company has claims data to report, submit a "data" filing by the filing deadline listed in the data call notice. If the company does not have any Florida claims for the identified lines of business within the CRF to report for the event, the company must submit a "No Data" filing in IRFS only for the initial reporting period. However, companies must submit "Data" filings for each deadline once claims are received.

## Q: If a zip code is not listed for a county, should a company choose the county and then the unknown zip code?

A: The CRF will accept all zip codes for Florida counties. If a company is unable to provide the county or zip code data for a claim, please enter "Unknown" in the county or zip code field. A company may only categorize a county or zip code as "Unknown" after every effort has been made to assign each claim to the specific county in which the loss occurred. If fields are marked "Unknown," OIR Market Regulation may request additional details for each claim reported in this category to evaluate the adequacy of the company's claim systems.

# Q: Should reopened and supplemental claims only be included in the Number of Claims Reported columns, as well as the Reopened and Supplemental Claims rows on the Survey tab? Or should they also be included in the Open Claims With/Without Payment columns due to their current open status? Or should they also be included in the Closed Claims With/Without Payment columns because they were closed at one point?

A: The reopened or supplemental claim should be reported based on the status of that reopened or supplemental claim at the time of reporting. The claims reported categories within the "Survey" tab, such as Number of Open Claims With/Without Payment and Number of Claims Closed With/Without Payment, are mutually exclusive from each other. The company must ensure that reopened and supplemental claims are not reported in more than one category. Companies should also refer to the definitions of reopened claims and supplemental claims which can be found in the "Instructions" tab within the CRF.

### Q: Should legal expenses be included in loss adjustment expense (LAE) calculations?

A: It depends on the type of legal expenses. If referring to legal expenses paying attorneys to handle claims in court, then yes, that is a LAE. It may be Allocated LAE or Unallocated LAE depending on how things can be allocated. If referring to legal expenses of claimants that have to be paid, that is not LAE. If meaning just the general legal expenses that are paid for attorneys to handle matters that are outside of claims handling, then that is also not LAE. Companies should also refer to the definition of LAE that can be found in the "Instructions" tab within the CRF.

## Q: How must claims be classified if there are multiple coverages under one policy with differing statuses?

A: Each claim must be reported under the associated line of business and as open or closed based on the claims' status at time of the data reporting. For example, a homeowner's policy may include both wind and flood coverage. If both a wind and a flood claim on that policy is triggered each claim must be reported separately, although both claims fall under the same policy. In another scenario, this very same homeowner's policy's flood claim was denied and closed, whereas the homeowners wind claim remains open. In this case, two claims would be reported on the CRF under one policy, however, one claim would be reported as open, while the other would be reported as closed.

## Q: We have multiple insurance companies within one group. May we file on a group basis as opposed to making a filing for each company?

A: Companies must make all CRF filings on an individual company basis. This requirement applies to "No Data" and "Data" filings. Companies must make a filing by the Filing Deadline listed in the data call notice.

Q: The company's claim system does not efficiently capture specific reasons claims are closed without payment, making it difficult to report data within lines 14 through 26 of the Survey tab. May the company disclose all or most reasons claims are closed without payment on line 27 of the Survey tab?

A: It is OIR's expectation that the companies capture specific reasons claims are closed without payment for every applicable claim. The company must make every effort to collect reasons claims are closed without payment, whether through a manual or technical process. OIR Market Regulation may request additional details for each claim reported in line 27 to evaluate the adequacy of the company's claim systems. In these instances, companies are still required to make a filing by the Filing Deadline listed in the data call notice.

#### **Additional Questions**

If the Company has any questions regarding the CRF, email <u>DisasterReporting@floir.com</u> or call 850-413-3147.