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OFFICE OF INSURANCE REGULATION
PROPERTY AND CASUALTY
PRODUCT REVIEW

June 3, 2011

Michael Milnes

Bureau of Property and Casualty

Office of Insurance Regulation

RE: Update of Form OIR-B1-1802 (Uniform Mitigation Verification Inspection Form)

I understand that the "Qualified Inspector" section of page 4 of the form is to be modified to remove "Hurricane mitigation inspector certified by the My Safe Home Program." This should not be a problem, however there is another problem with the same section of the form that needs to be addressed, under "Other individual or entity"

This section is giving some insurers an excuse to ignore their clients claims for justified discounts. The current wording leaves it up to the discretion of the insurer whether to accept this form from a licensed roofer and thus gives the insurer an excuse to overcharge a client who has a new code compliant roof.

Some people are getting new, code compliant roofs and seeing their insurance rates raised to rates higher than when they had an old non-compliant roof.

When a licensed roofer in Charlotte County pulls a permit, they have to provide all of the product approvals as a part of the permit application. When the roof is inspected, a Licensed Building Code Inspector checks for the roof deck attachment, among other things. He also checks the products being used to be sure they are the products listed on the permit (such as the secondary water barrier) and he checks to be sure the products are properly installed. If the inspector finds that the roofer is not doing what he is supposed to the inspector makes the roofer change it before he will pass the inspection. When the roof is finished and passes the inspections, the roofer generally fills out the Uniform Mitigation Verification Inspection Form. Most roofers are willing to provide copies of the permit app., the signed off inspections from the County inspector, and pictures of the job. The signed off inspections confirm the roofer has done what was on the permit application and directly applies to and supports sections 2, 3, and 8 of the Inspection form.

The insurer should be required to recognize the authority and the qualifications of the Licensed Building Code Inspector on the permit even if the Uniform Mitigation Verification Inspection form is not completed by him.

Additionally they should be required to recognize the qualifications of the licensed roofers. Licensed roofers do have mitigation training and they do complete CEUs in mitigation.