

March 29, 2022

The Honorable Delores Kelley
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401

**RE: House Bill 436 - Motor Vehicle Insurance – Use of Credit History Rating Policy-
FAVORABLE WITH AMENDMENT**

Dear Chairwoman Kelley Wilson and Members of the Senate Finance Committee,

My name is Matt Overturf, I am the Regional Vice President for the Ohio Valley & Mid-Atlantic Region for the National Association of Mutual Insurance Companies (NAMIC). NAMIC is the nation's largest property and casualty trade association with more than 1,500 members. NAMIC appreciates the consideration of HB 436 and the addition of the extraordinary life circumstances language (ELC). The ELC language is national model language that NAMIC supports across the country and has supported in Maryland in previous years; we do so again this year.

Unfortunately, in the House, additional language was included to create a reporting mechanism that is problematic for NAMIC and our members. While ELC's are a valuable consumer protection, the additional reporting requirement is an unnecessary step with no benefits to anyone involved in the process. Provision 3 of section VI is particularly problematic, as it would require insurers to collect specific, sensitive, protected class demographic data on every policyholder who applies for an ELC exemption. Simply put, property and casualty insurers do not collect this data (income, race, ethnicity) from their policyholders today and don't want to – ever. For this reason, NAMIC joins our industry partners in requesting an amendment to Section VI that would only require insurers to report the number of exemptions granted in the reporting period. With that amendment, NAMIC would fully support HB 436.

I appreciate the opportunity to appear before the committee today.

Thank you,

Matthew Overturf
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