

March 13, 2025

Representative Joseph Solomon, Jr.
Chair, House Corporations Committee
Rhode Island State House
Providence, RI 02903

Re: Support House 5569 – An Act Relating to Insurance - Pet Insurance

Dear Chair Solomon:

The American Property Casualty Insurance Association (APCIA)¹ appreciates the opportunity support the testimony of the North American Pet Health Insurance Association (NAPHIA) in support of H.5569 and to recommend one minor modification to the bill. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

H.5569 builds upon existing regulatory frameworks and establishes specific rules for pet insurance that work for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both consumers and the insurance industry will benefit from a consistent nationwide approach for pet insurance that ensures clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies;
- clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law;
- requires important consumer disclosures; and
- establishes uniform meanings of key terms for better understandability.

APCIA supports the bill as drafted and, as NAPHIA has proposed, respectfully requests the following change from the introduced version of H.5569, which will make this bill even more consumer friendly:

Section 27-83-5. Policy conditions. – On page 6, line 8 the bill still states “as such policy effectuation date is clearly disclosed and no premium is charged...” this sentence needs to be amended to replace charged with earned and should read " no premium is earned"

¹ Representing nearly 65% of the U.S. property casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. Several APCIA members are located in Rhode Island and many more do business here. Together, APCIA members write almost 68.5% of the commercial insurance sold in the state.

With this change, the provision would be the same as the version of the bill that passed the Assembly last year.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the proposed revision, the legislation will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language of H.5569 has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

APCIA respectfully requests that you approve this important legislation with the requested amendments. Thank you for your consideration of APCIA's views.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jon Schreiber", with a stylized flourish at the end.

Jonathan Schreiber
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