



April 2, 2026

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

Re: House Resolution 7478 – AN ACT RELATING TO INSURANCE -- HOMEOWNER CASUALTY INSURANCE BILL OF RIGHTS

Dear Chair Solomon:

This statement in opposition to H.7478 is submitted by the American Property Casualty Insurance Association (APCIA).¹ H.7478 requires insurers to provide claimants with a homeowners bill of rights. We support the concept of educating consumers about insurance and strongly support the six recommendations listed under “YOU ARE ADVISED TO.” The specifics of the bill may generate some confusion, and we would welcome the opportunity to work with the sponsor to revise them. We also believe the goals of this bill can be better served by posting a corrected version on the Department of Business Regulation’s website.

H.7478 Uses Unclear and Incorrect Language

The bill requires insurers to provide insureds the bill of rights within 14 days after receiving “an initial communication with respect to a claim.” This language is unclear and potentially impossible to ascertain. For example, if an insured asks a question about their coverage level, it is possible that it could be an “initial communication with respect to a claim,” or merely an inquiry about their policy. There is really no way of knowing from the insurer perspective until the actual claim is made, and at that point if there was any prior communication, the insurer will be in violation. This seems likely to generate significant expensive litigation.

The bill of rights itself also includes several departures from existing law:

	Bill of Rights	Existing Law/Reg
Acknowledgement of claim	14 days	15 days 230-RICR-20-40-2(2.6)(A)
Proof of loss statement	20 days	21 days 230-RICR-20-40-2(2.7)(A)
Denial of claim	30 days	After receipt of proof of loss: 21 days or request for more time 230-RICR-20-40-2(2.7)(A)

¹ Representing 67% 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 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. APCIA members are integral to the state of Rhode Island. They write 76% of the property casualty insurance sold in this state. The P&C insurance industry employs over 3,200 Rhode Islanders, provides annual assistance of \$1.5 billion in claim payments to help customers in the state, and contributes over \$160 million annually to the state in premium taxes.

Receive full settlement payment for claim or undisputed portion	30 days	Insurer shall affirm or deny liability within a reasonable time Undisputed claims payment tendered within 30 days of affirmation of liability
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In addition, providing additional documents creates administrative costs for insurers as this is not common practice (Florida is the only state with such a requirement). It also could have unintended consequences for consumers who may:

1. Be distrustful of insurers and thus may be more receptive to the same data from an official government source (e.g. posted on DBR website) and
2. Be receiving other communications from their insurer working through the claim process and find additional paperwork confusing and voluminous.

Building on the first point above, the Massachusetts Division of Insurance has done something nearly identical for automobile insurance² and substantially similar for homeowners³. The Rhode Island DBR consumer website⁴ already provides a robust overview of homeowners insurance, but links to a national resource on making a claim.⁵ While that site has valuable information, we think it could be further bolstered by the Rhode Island-specific information contained in this bill.

In sum, we believe this bill would create a helpful resource for consumers that could be improved with technical corrections and an alternative delivery mechanism. We would welcome the opportunity to discuss further with the sponsor.

Very truly yours,



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² <https://www.mass.gov/info-details/massachusetts-consumer-bill-of-rights-for-automobile-insurance>

³ See e.g. <https://www.mass.gov/info-details/understanding-home-insurance> and <https://www.mass.gov/info-details/frequently-asked-questions-about-homeowners-insurance>

⁴ <https://dbr.ri.gov/insurance/consumers>

⁵ <https://content.naic.org/article/what-you-need-know-when-filing-homeowners-claim>