

April 2, 2026

Rep. Joseph J. Solomon, Jr.  
Chair, House Corporations Committee  
Rhode Island House of Representatives  
Rhode Island State House  
Providence, RI 02903

***RE: NAMIC Testimony in Opposition of H7478***

Chair Solomon, esteemed Members of the Committee:

The National Association of Mutual Insurance Companies (NAMIC) is grateful for the opportunity to submit testimony regarding our concerns with H7478 as currently drafted.

NAMIC is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies - including local and regional insurers as well as some of the nation's largest carriers - NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners' and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.

Rhode Island homeowners' insurance consumers are already protected by a robust and comprehensive regulatory framework overseen by the Department of Business Regulation (DBR). This framework includes longstanding statutory requirements governing policy language, claims handling, and consumer notice; most notably Rhode Island General Law § 27-5-3, which establishes the Standard Fire Policy. That statute was deliberately designed to ensure uniformity, enforceability, and clarity across homeowners' insurance contracts statewide.

Against this backdrop, H7478 does not fill a regulatory gap. Instead, it introduces new requirements that either duplicate or directly conflict with existing law. By departing from the Standard Fire Policy framework, the bill undermines the consistency that consumers, insurers, and regulators rely on.

For example, while current law allows insurers 60 days to pay covered claims and already mandates notification of claims investigations within 20 days, H7478 imposes different timelines. These conflicting standards do not enhance consumer protection; rather, they create uncertainty about which rules apply and invite confusion in claim handling and enforcement.



These inconsistencies also risk harming the very consumers the bill is intended to protect. Insurance policies are legal contracts built on precise, standardized language. When statutory mandates require insurers to include simplified or conflicting disclosures within those contracts, the result can be misunderstanding rather than clarity.

The bill's contractor-related guidance illustrates this concern. While the advice itself is sensible, placing it inside insurance policy documentation makes it less likely to be seen, read, or understood. Consumer-facing guidance of this nature would be far more effective if delivered separately, through DBR publications, consumer alerts, or other educational tools, rather than embedded in lengthy and technical policy forms. If the General Assembly believes a Homeowner Bill of Rights is necessary, it should be developed centrally by DBR and presented in a standalone, consumer-oriented format. Such an approach would preserve the integrity and consistency of insurance contracts while ensuring that consumers receive clear, accessible information from a trusted regulatory source.

For these reasons, NAMIC opposes H7478 as currently drafted and respectfully urges the Committee to amend the bill to address these concerns before passage.

Sincerely,

*Sean McLaughlin*

Sean McLaughlin  
National Association of Mutual Insurance Companies  
Regional Vice President, State Affairs - Northeast  
smclaughlin@namic