



Roadmap to Recovery®  
Advocacy and Action  
Roadmap to Preparedness

July 18, 2025

The Honorable Adam Schiff  
Hart Senate Office Building #112  
Office Building  
Washington, DC 20510

**RE: SB 2349, INCORPORATING NATIONAL SUPPORT FOR UNPRECEDENTED RISKS AND EMERGENCIES (INSURE ACT) — SUPPORT**

Dear Senator Schiff,

We write to express our strong support for SB 2349, the “INSURE ACT” (INCORPORATING NATIONAL SUPPORT FOR UNPRECEDENTED RISKS AND EMERGENCIES) on behalf of the millions of U.S. home and business owners that rely on having property insurance in place so as to be resilient to adversity. Homeowners also rely on our non-profit organization, United Policyholders, (“UP”)<sup>1</sup> to keep them informed and advocate on their behalf.

Because UP is monitoring property insurance marketplace conditions across the country, hearing from *many* consumers in *many* states, and communicating with insurance companies, state insurance regulators, realtors, insurance agents and brokers, we know how important your proposal is and how critical it is that it be enacted as quickly as feasible.

There is a property insurance availability and affordability crisis in the United States that isn’t going to fix itself.<sup>2</sup> Now that for-profit insurers and reinsurers are using risk scoring, data mining, aerial imagery and predictive modeling for underwriting and rating, and now that destructive extreme weather events are occurring more often, the experienced and reputable ones will not be continuing to insure all the regions and properties they’ve previously been willing to insure. It is up to the public sector to innovate. We cannot rely on private market competition alone to restore essential coverage at affordable prices for people to protect their homes and businesses.

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<sup>1</sup> United Policyholders (“UP”) is a non-profit organization that has been informing, helping, and speaking for insurance consumers across the United States since 1991. UP is funded by donations, grants and volunteer labor. Through our Roadmap to Preparedness and Roadmap to Recovery programs, UP helps Americans reduce risk, protect their assets, and successfully navigate insurance claims and loss recovery. Through our Advocacy and Action program, UP promotes fair insurance practices and defends consumer rights and protections.

<sup>2</sup> <https://uphelp.org/bach-talk-government-supported-property-insurance-programs-are-here-to-stay/>

The INSURE ACT is the innovation we need. While there are myriad state government sponsored hybrid public/private insurance programs already in place, those programs, the voluntary market, and consumers need additional help at the Federal level.

By supplementing privately available reinsurance, institutionalizing risk reduction funding, incentives and rewards, and restoring a way for Americans to protect their assets against the full spectrum of natural hazards, this bill advances our national imperative to keep U.S. households financially protected and our mortgage system sound.

Per my quote in 2014's "This Changes Everything: Capitalism and the Climate", a publicly traded insurance company in the face of climate change is not a sustainable business model for the end user, the consumer.<sup>3</sup> To avoid what the author of that book referred to as a "disaster capitalism free-for-all", we must innovate. Insurers are signaling loud and clear that they need to significantly reduce the amount of capital they're investing in insuring real property throughout the country.<sup>4</sup>

No state in the country is immune to natural disaster risks, be they hurricanes, hail, floods, earthquakes, wildfires or tornadoes, and while there are businesses and affluent homeowners that can afford to forgo buying insurance and self-insure, the majority of Americans can't. Yet we know that an historical number of U.S. property owners are "going bare" because they either have no option at all or no affordable option for buying insurance.<sup>5</sup>

In the interest of preventing structures from being damaged or destroyed in severe weather events, maintaining the safety and soundness of our banking and lending systems, protecting the financial health of individuals, households and small businesses across the country, and advancing our longstanding national goal of making homeownership accessible to all, it is imperative that we innovate at this critical juncture<sup>6</sup>.

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<sup>3</sup> This Changes Everything: Capitalism and the Climate, Simon & Schuster, 2014, at page 109.

<sup>4</sup> "Climate change is impacting the home insurance industry and damaging the housing market" CNN, Nov. 7, 2023

<sup>5</sup> EXPOSED: A Report on 1.6 Trillion Dollars of Uninsured American Homes  
<https://consumerfed.org/reports/exposed-a-report-on-1-6-trillion-dollars-of-uninsured-american-homes/>

<sup>6</sup> <https://uphelp.org/bach-talk-an-insured-future-depends-on-bold-public-private-innovation/>

We have to incentivize, reward and increase the pace and extent of natural hazard risk reduction across the country. We must moderate the negative impact on Americans of unregulated reinsurance rates, technology-fueled underwriting decisions based on risk scores, AI, predictive models and drone surveillance. We must be a United States that offers its citizens the opportunity to buy into a program through which they can maintain a safety net at a reasonable cost so they don't have to rely on limited charitable or government aid, face financial ruin, or become homeless in the event a disaster damages or destroys their home.<sup>7</sup>

No state in the country is immune from the wave of property insurance non-renewals and premium increases sweeping across our nation. And while most states have one or more government-created property insurance programs of last resort, reinsurance market realities (pricing and limited availability) challenge their ability to sell affordable coverage. Private insurers are similarly challenged by reinsurance pricing and constraints, and non-renewals and sharp price increases are largely tied to that challenge.<sup>8</sup>

The bottom line is that we need the Federal Government's involvement and financial strength to supplement the catastrophic risk capacity that is available through existing government-sponsored plans, publicly-held, mutual, excess and surplus lines insurers, exchanges, captives, and reinsurers. And we need to face the music: Climate change and predictive technology have reduced the amount of private capital that insurers and reinsurers are willing to invest in underwriting real property risks.

The approach this bill takes should not lead to a "states versus feds" debate. It should lead to an "all for one" not-for-profit approach that engages insurers and reinsurers' expertise and resources but fills in the coverage affordability and availability gaps they've created without unduly burdening taxpayers. Just as we've established Federal programs for insuring crops, terrorism and flood risk, we need to establish a Federal program that pools and spreads natural disaster risk, facilitates mitigation and resiliency, and provides essential protection for American homes.

An increasing number of states have impactful programs such as My Safe Florida Home, Strengthen Alabama Homes and the California Earthquake Authority's Brace and Bolt program. The important risk reduction innovation being facilitated by the North Carolina Coastal Property Insurance Pool and Smart Home America is leading to significant improvements in those state's

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<sup>7</sup> <https://uphelp.org/home-insurance-availability-affordability-and-quality-is-shrinking-states-and-the-feds-must-coordinate-and-take-action-to-protect-homeownership-in-the-us/>

<sup>8</sup> "As Insurers Around the U.S. Bleed Cash From Climate Shocks, Homeowners Lose", New York Times, May 13, 2024.

insurance markets thanks to their mitigation programs, insurance incentives and premium discounts.

We have ample models of hybrid (public and private) insurance programs of last resort to look to, and while none may be the panacea recipe, we're not starting from scratch.

For the above reasons, United Policyholders strongly supports the INSURE ACT and looks forward to working with your office to advance the measure.

Sincerely,

A handwritten signature in black ink that reads "Amy Bach". The signature is fluid and cursive, with the first name "Amy" and last name "Bach" clearly distinguishable.

Amy Bach  
Executive Director