

Division of Insurance

Recent Developments and Common Pitfalls in Property and Casualty Rate Filings

Gennady Stolyarov II, FSA, ACAS, MAAA, CPCU, ARe, ARC, API, AIS, AIE, AIAF

Lead Actuary, Property and Casualty Insurance

Nevada Division of Insurance

Contact: gstolyarov@doi.nv.gov

*Presentation for the
Casualty Actuarial Society (CAS)
Ratemaking, Product, and Modeling (RPM) Seminar
March 21, 2018*

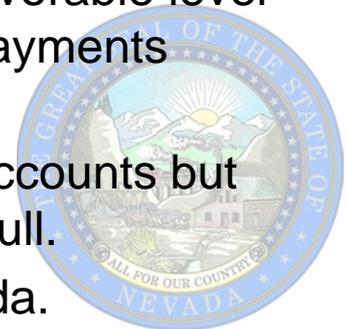


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Recent Developments:

Credit-Based Insurance Scoring (CBIS): Payment in Full on Revolving Accounts

- Ability to determine whether a revolving trade account (e.g., a credit card) has its balance paid in full each month.
- Previously, variables only considered whether the account was paid “as agreed” – e.g., whether the consumer made at least the minimum payment on a credit card each month.
- Historically, credit-utilization variables captured balance “snapshots” – arbitrary dates at which the account issuer chose to report to the credit bureau, not necessarily related to the due date for a monthly payment.
- Consumers who pay off their revolving balances in full (often within the grace period, to avoid interest charges) may present a different, more favorable level of risk as compared to consumers who only make the minimum payments and/or decide to incur interest charges.
- Use of this information may benefit consumers with fewer credit accounts but who have a consistent history of paying off revolving accounts in full.
- As always, variable-specific supporting data are required in Nevada.

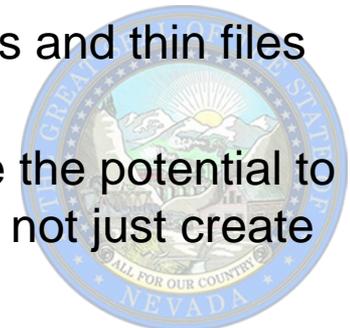


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Recent Developments:

Credit-Based Insurance Scoring (CBIS): Information on Broader Range of Accounts

- Telecommunication and utility accounts and inquiries may now appear on certain reports collected by credit bureaus and data vendors.
- The data are maintained by the **National Consumer Telecom & Utilities Exchange**: consortium of 95+ companies in telecommunications, utilities, and pay TV industries.
- Several major vendors of credit data have developed lending-oriented scores based on utility & telecommunication account information during the past 5 years.
- Considering telecommunication and utility accounts in CBIS models may help individuals without traditional credit histories demonstrate reliable payment patterns and a history of financial responsibility.
- Such consideration may also reduce the population of credit no-hits and thin files by enabling many more individuals to become scorable.
- *However*, it is important for consideration of such accounts to have the potential to benefit an insured (via recognition of consistent, timely payments), not just create more possibilities for surcharges.



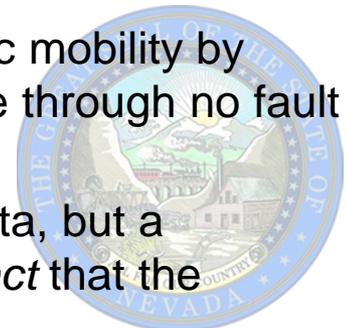
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Recent Developments:

Public-Record Information

Information on Residence History

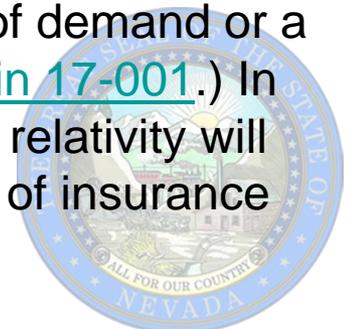
- The Nevada Division of Insurance currently only allows length of residency to be used to provide discounts at the time of new business. Nevada-specific supporting data for other uses of residency information have generally been lacking.
- Recently, we have become aware of models in development, considering public-record information regarding:
 - Number of subjects at an address
 - Type of address (e.g., residential, multi-family P.O. box, associated with a business, associated with a correctional institution)
 - Amount of time since most recent recorded purchase
 - Insured's history of property ownership
 - Insured's length of residency at *prior* addresses
 - Insured's history of prior addresses and any evictions
- Great concern regarding whether these variables impede socioeconomic mobility by penalizing individuals who seek work opportunities or who need to move through no fault of their own.
- Insurers may consider territory and ownership status, if supported by data, but a consumer's premium should not increase at renewal due solely to the *fact* that the consumer moved (without consideration of *where* the consumer moved).



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Recent Developments: *Public-Record Information* Consumer Behavioral Information

- **Criminal history:** Available from certain data vendors. In Nevada, the criminal history must pertain to the *insured* (not relatives or other persons) and must be *relevant to the risk of loss* for the line of business in question. Also, a person is innocent until proven guilty. With regard to **motor-vehicle violations** and any other criminal matters, only actual **convictions** may be considered chargeable.
- **Shopping history:** Nevada will not approve any variable that considers a consumer's shopping behavior apart from any related credit accounts. (For instance, the fact that a consumer obtained an installment loan for furniture may be considered, but the fact that the consumer has purchased furniture may not be.)
- **Insurance complaint / shopping behavior:** Nevada will not approve any "price optimization" model which sets rates on the basis of price elasticity of demand or a consumer's tendency to complain or shop for insurance. (See [Bulletin 17-001](#).) In any predictive model which considers the extent to which a selected relativity will move toward an indicated relativity, only variables related to the risk of insurance loss may be considered.



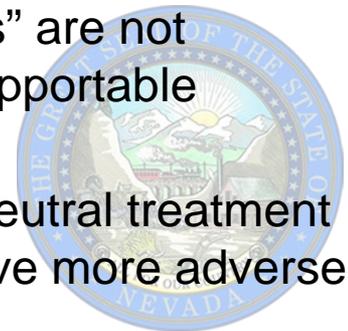
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Common Pitfalls:

Rate Filings Involving Predictive Models

Each of the following pitfalls may delay approval of a filing by several months!

- Failure to identify the existence of or any changes proposed to a predictive model.
- Failure to include a copy of predictive-model algorithm (may be filed as confidential in SERFF).
- Refusal to provide any model or algorithm to the Division. (If we cannot review the model document, then the model may not be used in Nevada.)
- Reference to older filings which contain obsolete predictive models (especially models subsequently revised at the Division's request), or which contain no model but references to still-older filings.
- Failure to provide the required informational items in the Credit Scoring Statement (if the company is using credit-based insurance scoring).
- Failure to provide variable-specific support. Overall model "lift charts" are not sufficient. An overall-predictive model may still contain several unsupportable categories and treatments.
- Any worse-than-neutral treatment of credit no-hits and thin files (a neutral treatment is the presumed baseline in NRS 686A.680(5)(b); we will **not** approve more adverse treatments).



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Common Pitfalls:

Rate Filings Involving Predictive Models

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- For predictive models involving multivariate techniques, failure to provide any of the three layers of support:
 - **Layer 1: Raw Input Data:** Provide the raw premiums, losses, and loss ratios that were used as inputs in the model. Specify the timeframe to which the data apply, the jurisdictional scope (state-specific, countrywide, etc.), and the books of business (private passenger automobile, home, etc., as well as specific companies).
 - **Layer 2: Structure of Model:** Provide a thorough discussion of the underlying assumptions and modeling methodology and the reasons for the approaches selected. Include all mathematical formulas used.
 - **Layer 3: Model Outputs:** These are typically indicated relativities, which should be compared/contrasted with the selected treatments.
- Use of non-Nevada catastrophe data (for catastrophe models).
- Use of obsolete (especially pre-Great Recession) data.
- Sole reliance on countrywide experience when Nevada experience is qualitatively different.

