

practices, even if not intentional, can result in unfair discrimination, including requests for supplemental information. According to NAIC data, from 2007 to 2018, states conducted 523 examinations pertaining to “underwriting discrimination,” “rating discrimination,” or “use of prohibited rating factors.” State regulators found 51 instances where 32 different companies were non-compliant and took action accordingly.⁵

Moreover, state regulators recently enhanced their toolkit specifically as it relates to auto insurance by collecting ZIP Code level data from statistical agents. All states now have access to the data in a tool that takes the 12 million plus records and makes them easier to analyze. Regulators can select a region, city, or ZIP Code