

Market Conduct Examination Report

***CITIZENS PROPERTY INSURANCE
CORPORATION***

NAIC Company Code: 10064

Issued: January 24, 2025



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Executive Summary

The Florida Office of Insurance Regulation (“OIR”) performed a market conduct examination of Citizens Property Insurance Corporation (“Citizens”) pursuant to Section 627.351(6)(l), Florida Statutes (“F.S.”). The scope period of this examination was July 1, 2022, through June 30, 2024. The examination began August 1, 2024, and ended January 24, 2025.

The purpose of this market conduct examination was to determine Citizens’ compliance with its plan of operation and its internal operational procedures. A detailed review of Citizens’ procedures, operations, activities and records reflects certain findings. Information relating to these findings is reported herein.

Pursuant to Section 627.351(6)(l), F.S., this report is being prepared for submission to the President of the Senate and the Speaker of the House of Representatives of the Florida Legislature.

Purpose and Scope of the Examination

OIR has primary responsibility for the regulation, compliance, and enforcement of statutes related to the business of insurance and the monitoring of industry markets. Due to this responsibility, OIR conducted a market conduct examination of Citizens, pursuant to Section 627.351(6)(l), F.S. The purpose of a market conduct examination is to review an insurer’s operating practices to determine if they comply with the Florida Insurance Code, rules related to the business of insurance, procedures adopted by Citizens, provisions contained within a contract of insurance issued by Citizens and orders issued by OIR.

A review of Citizens’ plan of operation was performed to include the evaluation of current processes and procedures, corporate records, general operations, policyholder service, underwriting and rating and claims. This report is based on information obtained during the examination, research conducted by OIR and additional information provided by Citizens. The files examined were randomly selected from data files provided by Citizens. Citizens’ records were examined remotely by the examiners.

Procedures and conduct of the examination were in accordance with the *Market Regulation Handbook* promulgated by the National Association of Insurance Commissioners (“NAIC”). The number of randomly selected items in each sample is consistent with the recommended sample size in the NAIC’s *Market Regulation Handbook’s* Acceptance Samples Table. Examination results with a 95% confidence level permit those results to be extrapolated to the population identified in each of the areas examined.

The examination included a review of Citizens’ operations in the following areas:

- Plan of Operation;
- Hurricane Ian Claims;
- Hurricane Idalia Claims;
- Claims-Handling Manual;
- Managed Repair Program;
- Property Insurance Clearinghouse Program; and
- Depopulation Program.

Corporate Records

Citizens was established on August 1, 2002, pursuant to Section 627.351(6), F. S., as amended in 2002 by Senate Bill 1418 and House Bill 385, to provide certain property insurance coverage to qualified risks in the state of Florida. The intent of the legislation was to provide property insurance to applicants who are unable to procure insurance through the voluntary market. Citizens was formed from a combination of the Florida Residential Property and Casualty Joint Underwriting Association and the Florida Windstorm Underwriting Association. The Florida Residential Property and Casualty Joint Underwriting Association was renamed Citizens Property Insurance Corporation. The rights, obligations, assets, liabilities and all insurance policies under the Florida Windstorm Underwriting Association were transferred to Citizens. Citizens is not required to have a Certificate of Authority issued by OIR.

Citizens operates under the supervision of a nine-member Board of Governors (“Board”). Pursuant to its Plan of Operation, Florida's Governor appoints three members, while the Chief Financial Officer, Speaker of the House and President of the Senate each appoint two individuals as members of the Board. Each Board member serves at the pleasure of his or her appointing officer. All Board members must be appointed for three-year terms beginning annually on a date designated by its Plan of Operation. However, for the first term beginning on or after July 1, 2009, each appointing officer is required to appoint one member of the board for a two-year term and one member for a three-year term.

Members of the current Board of Governors are:

- | | |
|----------------------------|------------------------|
| • Carlos Beruff – Chair | • Erin Knight |
| • Scott Thomas, Vice Chair | • LeAnna Cumber |
| • Joshua Becksmith | • Jamie Shelton |
| • Jason Butts | • Robert A. Spottswood |
| • Charles Lydecker | |

Total Direct Premiums Written in Florida during the examination scope period:

Year	Total Direct Written Premiums in Florida (Per Schedule T of the Annual Statement)
July 1, 2022-December 31, 2022	\$1,696,044,880
Calendar Year 2023	\$5,070,988,859
January 1, 2024-June 30, 2024	\$2,592,506,597

Citizens Operations

Citizens is a statutorily created governmental entity whose purpose is to provide property insurance coverage to applicants who are in good faith entitled to procure insurance through the voluntary market but are unable to do so. Therefore, Citizens does not employ a system to actively seek business. Citizens focuses on communications, training and compliance to facilitate its agents' customer service efforts. As of June 30, 2024, 12,545 licensed and appointed insurance agents served its policyholders. Agents must hold an active 2-20 or 20-44 Florida Resident Agent License or an active 9-20 or 90-44 Non-Resident Agent license. Section 627.351(6)(c)14., F.S., provides that an agent must also be appointed by at least one other insurer writing certain types of property insurance coverage. Prior to an agent's appointment, Citizens requires the completion of at least two training modules.

Citizens assists Florida consumers with obtaining property insurance coverage when they are unable to obtain it from an authorized insurer. Under Florida law, Citizens may write new personal residential insurance policies if a property meets one of the following eligibility criteria:

- Coverage is not otherwise available from an authorized insurer licensed to conduct business in Florida; or
- The premiums offered for coverage by an authorized insurer licensed to conduct business in Florida are 20% greater than the premiums offered by Citizens for comparable coverage.

Hurricane Ian and Hurricane Idalia Claims

In preparation for the examination, Citizens provided the total number, or universe, of Hurricane Ian and Hurricane Idalia claims reported with a Florida exposure during the examination scope period. The claims universe for each hurricane was divided into three categories: claims closed with payment, claims closed without payment and reopened or supplemental claims. For the purposes of this examination, the selection of claims reviewed for each of the categories was defined as follows:

- Claims Closed With Payment: The first or initial Hurricane claim filed by the named insured, policyholder, or legal representative due to a loss occurring to a personal residential or commercial residential risk that was closed with payment during the examination's scope periods.
- Claims Closed Without Payment: The first or initial Hurricane claim filed by the named insured, policyholder, or legal representative due to a loss occurring to a personal residential or commercial residential risk that was closed without payment for any reason during the examination's scope periods.
- Reopened or Supplemental Claims: The first or initial claim filed by the named insured, policyholder, or legal representative due to a loss occurring to a personal residential or commercial residential risk that was closed for any reason and that was reopened or was a supplemental claim upon request for additional costs for loss or damage previously disclosed to the insurer.

Hurricane Ian Claims

The following Findings are compiled from the examiners' review of Citizens' Hurricane Ian claims that were adjudicated during the examination scope period of September 28, 2022, to June 30, 2024.

Claims Closed With Payment: Citizens identified a universe of 47,469 residential property Hurricane Ian claims that were closed with payment during the examination scope period. A random sample of 109 claims was selected and reviewed by the examiners.

Claims Closed Without Payment: Citizens identified a universe of 13,964 residential property Hurricane Ian claims that were closed without payment during the examination scope period. A random sample of 109 claims was selected and reviewed by the examiners.

Reopened or Supplemental Claims: Citizens identified a universe of 1,604 residential property Hurricane Ian claims that were reopened during the examination scope period. A random sample of 105 claims was selected and reviewed by the examiners.

Finding 1: The examiners determined that in three instances out of 323 claims reviewed, an error rate of 0.9%, Citizens utilized adjusters who were not properly appointed, as required by Section 626.112(1)(a), F.S.

Finding 2: The examiners determined that in four instances out of 323 claims reviewed, an error rate of 1.2%, Citizens did not include the license number of the adjuster communicating about the claim in a subsequent communication with the policyholder regarding the claim, as required by Section 627.70131(3)(c), F.S.

Finding 3: The examiners determined that in three instances out of 323 claims reviewed, an error rate of 0.9%, Citizens did not notify the policyholder that he or she may request a copy of any detailed estimate of the amount of the loss generated by an insurer's adjuster within seven days after the insurer's assignment of an adjuster to the claim, as required by Section 627.70131(3)(d), F.S.

Finding 4: The examiners determined that in nine instances out of 323 claims reviewed, an error rate of 2.8%, Citizens did not, when providing a preliminary or partial estimate of damage regarding a claim, include with the estimate the disclosure statement, as required by Section 627.70131(6)(a), F.S.

Finding 5: The examiners determined that in three instances out of 323 claims reviewed, an error rate of 0.9%, Citizens did not, within 90 days, pay or deny initial, supplemental, or reopened claims, as required by Section 627.70131(7)(a), F.S.¹.

Finding 6: The examiners determined that in three instances out of 323 claims reviewed, an error rate of 0.9%, Citizens did not pay interest when the claim payment was made more than 90 days after receiving notice of the claim, or more than 15 days after there were no longer factors beyond the control of the insurer which reasonably prevented such payment, as required by Section 627.70131(7)(a), F.S.

Finding 7: The examiners determined that in three instances out of 323 claims reviewed, an error rate of 0.9%, Citizens did not provide a Homeowner Claims Bill of Rights to a policyholder within 14 days after receiving an initial communication with respect to a claim, as required by 627.7142, F.S.

¹ Section 627.70131, F.S. (2023), has reduced 14-day timeframes to 7 days, 45-day timeframes to 30 days, and 90-day timeframes to 60 days. Other additions and deletions were also made to the law.

Finding 8: The examiners determined that in 17 instances out of 323 claims reviewed, an error rate of 5.3%, Citizens did not make initial voice-to-voice contact within three calendar days of receipt of the catastrophe claim assignment, as required by Citizens' claims-handling manual dated July 2021.

Finding 9: The examiners determined that in 64 instances out of 323 claims reviewed, an error rate of 19.8%, Citizens did not upload the estimate with the photos and sketch/diagram for the undisputed damages within five calendar days after the inspection, as required by Citizens' claims-handling manual dated July 2021.

Hurricane Idalia Claims

The following Findings are compiled from the examiners' review of Citizens' Hurricane Idalia claims that were adjudicated during the examination scope period of August 30, 2023, to June 30, 2024.

Claims Closed With Payment: Citizens identified a universe of 1,398 residential property Hurricane Idalia claims that were closed with payment during the examination scope period. A random sample of 105 claims was reviewed by the examiners.

Claims Closed Without Payment: Citizens identified a universe of 1,247 residential property Hurricane Idalia claims that were closed without payment during the examination scope period. A random sample of 105 claims was reviewed by the examiners.

Reopened or Supplemental Claims: Citizens identified a universe of 142 residential property Hurricane Idalia claims that were reopened during the examination scope period. A random sample of 76 claims was reviewed by the examiners.

Finding 1: The examiners determined that in one instance out of 286 claims reviewed, an error rate of 0.3%, Citizens utilized adjusters who were not properly appointed, as required by Section 626.112(1)(a), F.S.

Finding 2: The examiners determined that in one instance out of 286 claims reviewed, an error rate of 0.3%, Citizens did not include the license number of the adjuster communicating about the claim in a subsequent communication with the policyholder regarding the claim, as required by Section 627.70131(3)(c), F.S.

Finding 3: The examiners determined that in three instances out of 286 claims reviewed, an error rate of 1.0%, Citizens did not maintain all claim records, including communication with the policyholder indicating a claim denial, as required by Section 627.70131(4)(b), F.S.

Finding 4: The examiners determined that in 28 instances out of 286 claims reviewed, an error rate of 9.8%, Citizens did not, when providing a preliminary or partial estimate of damage regarding a claim, include with the estimate the disclosure statement, as required by Section 627.70131(6)(a), F.S.

Finding 5: The examiners determined that in three instances out of 286 claims reviewed, an error rate of 1.0%, Citizens did not, when providing a payment on a claim that was not the full and final payment, include with the payment the disclosure statement, as required by Section 627.70131(6)(b), F.S.

Finding 6: The examiners determined that in three instances out of 286 claims reviewed, an error rate of 1.0%, Citizens did not, within 60 days, pay or deny initial, supplemental, or reopened claims, as required by Section 627.70131(7)(a), F.S.

Finding 7: The examiners determined that in three instances out of 286 claims reviewed, an error rate of 1.0%, Citizens did not pay interest when the claim payment was made more than 60 days after receiving notice of the claim, or after the expiration of any additional timeframe provided to pay or deny a claim or a portion of a claim made pursuant to an order of the office finding factors beyond the control of the insurer, as required by Section 627.70131(7)(a), F.S.

Finding 8: The examiners determined that in two instances out of 286 claims reviewed, an error rate of 0.7%, Citizens did not provide a Homeowner Claims Bill of Rights to a policyholder within 14 days after receiving an initial communication with respect to a claim, as required by 627.7142, F.S.

Finding 9: The examiners determined that in ten instances out of 286 claims reviewed, an error rate of 3.5%, Citizens did not upload the estimate with the photos and sketch/diagram for the undisputed damages within five calendar days after the inspection, as required by Citizens' claims-handling manual dated October 2023.

Claims-Handling Manual

OIR conducted a review of Citizens' claims-handling manual for compliance with Section 627.4108(1), F.S., that requires each authorized residential property insurer conducting business in Florida to create and use a claims-handling manual. Specifically, each claims-handling manual must include guidelines and procedures for:

- Initially receiving and acknowledging initial receipt of the claim and reviewing and evaluating the claim;
- Communicating with policyholders, beginning with the receipt of the claim, and continuing until closure of the claim;
- Setting the claim reserve;
- Investigating the claim, including conducting inspections of the property that is the subject of the claim;
- Making preliminary estimates and estimates of the covered damages to the insured property and communicating such estimates to the policyholder;
- The payment, partial payment, or denial of the claim and communicating such claim decision to the policyholder;
- Closing claims; and
- Any aspect of the claims-handling process which OIR determines should be included in the claims-handling manual in order to:
 - Comply with the laws of this state or rules or orders of OIR or department;
 - Ensure that the claims-handling manual, at a minimum, comports with usual and customary industry claims-handling guidelines; or
 - Protect policyholders of the insurer or the general public.

No exceptions were noted.

Section 627.4108(3), F.S, requires each authorized residential property insurer to certify and attest on the prescribed form that:

- Each of the insurer's current claims-handling manuals complies with the requirements of this code and comports to, at a minimum, usual and customary industry claims-handling practices; and
- The insurer maintains adequate resources available to implement the requirements of each of its claims-handling manuals at all times, including during natural disasters and catastrophic events.

The attestations are required to be submitted to OIR:

- On or before August 1, 2023; and
- Annually thereafter, on or before May 1 of each calendar year.

No exceptions were noted.

Managed Repair Program

In June 2017, Citizens initiated a Managed Repair Program to provide policyholders with access to a network of licensed and credentialed contractors to:

- Return covered homes to a pre-loss condition;
- Facilitate the timely completion of repairs;
- Better control claim costs; and
- Reduce the frequency of litigation costs.

Citizens' Managed Repair Program assists policyholders insured by Homeowners-3 and Dwelling Policy-3 policy forms if their home is damaged by water not otherwise caused by a weather event. The Managed Repair Program provides policyholders with Emergency Water Removal Services and access to a Managed Repair Contractor Network. When a covered non-weather-related water loss is reported to Citizens and the policy contains the Managed Repair Program endorsement, Emergency Water Removal Services are automatically provided to remove the water and remediate the damage with no out-of-pocket expense to the policyholder. If the cause of the non-weather-related water loss is confirmed as a covered loss, the policyholder is also provided with the option to utilize the Managed Repair Program to complete necessary repairs by accessing the Managed Repair Contractor Network.

The Managed Repair Program allows policyholders to accept or decline the use of Citizens' Managed Repair Contractor Network to complete necessary repairs. For policyholders that opt to use the Managed Repair Contractor Network, the repairs are guaranteed by Citizens for five years. Should a policyholder choose to opt out of using the Managed Repair Contractor Network, the benefits provided under the Emergency Water Removal Services are limited to \$3,000 and the reimbursement for all additional repairs is limited to \$10,000.

Contractor Credentialing Process

Contractors that participate in Citizens' Managed Repair Contractor Network must satisfactorily complete specific credentialing requirements. Citizens contracts with a third-party vendor to complete the credentialing process and manage the network of licensed, independent general contractors who provide Emergency Water Removal Services and repair services through the Managed Repair Contractor Network.

To initially become eligible to receive assignments, contractors² must provide documents from the Florida Division of Corporations, W-9 tax documents, conflict of interest disclosure forms, certificates of insurance, valid Institute of Inspection, Cleaning and Restoration certifications in either applied structural drying technician or water damage restoration technician and proof of an active Florida Certified General Contractors License. Contractors must also pass criminal background screenings. After an onboarding process is conducted by Citizens, verified contractors become active in the rotation to receive assignments from the Managed Repair Program. Any contractor that fails to fully maintain these requirements is removed from the Managed Repair Contractor Network. Contractors are required to submit updated documents to Citizens annually.

The examiners reviewed Citizens' Standard Operating Procedures and documentation submitted for initially credentialing contractors in the Managed Repair Contractor Network.

No exceptions were noted.

Quality of Work

A claims department consisting of five teams of claims adjusters is utilized by Citizens' Managed Repair Program. The claims adjuster teams are led by claims managers who are responsible for monitoring repair projects and performing quality assurance checks. The Managed Repair Program also includes an Issue Resolution Department that is managed by a contracted third-party vendor. The claims adjusters coordinate with the Issue Resolution Department to resolve any concerns voiced by a policyholder, to include concerns related to the assigned contractor's quality of work. If a policyholder voices concerns, the assigned claims adjuster creates an incident report that is tracked by the claims manager. An incident report may be escalated to the Issues Resolution Team. The Issues Resolution Team collaborates with the policyholder, claims adjuster and assigned contractor to address and resolve the policyholder's concerns. A bi-weekly call with the Issues Resolution Team is conducted by Citizens to discuss escalated claims and create action plans, when necessary, to satisfactorily resolve policyholder concerns.

Citizens monitors incident reports to track contractor adherence with the Managed Repair Program in the following areas:

- Compliance with estimating guidelines and completion of accurate estimates;
- Timely communication and appointments with policyholders;
- Contractor conduct;
- Correct permitting;
- Quality of materials guidelines;

² Citizens does not track or require subcontractors hired by credentialed contractors to undergo the same credentialing process. Subcontractors operate under the credentialed contractor's license.

- Contractor workmanship;
- Reimbursement requests;
- Repair time; and
- Subcontractor quality of workmanship.

To enhance ongoing quality assurance within the Managed Repair Program, Citizens created a Claims Quality Assurance Reinspection Process. Through this process, Citizens' staff auditors perform randomly selected quality assurance audits of credentialed contractors.

The examiners reviewed Citizens' processes and procedures used to monitor the Managed Repair Program by the Claims Quality Assurance Process and evaluated Citizens' approach to addressing and resolving policyholder complaints when quality standards were not met.

No exceptions were noted.

Property Insurance Clearinghouse Program

In 2013, the Florida Legislature enacted Section 627.3518, F.S., establishing the Property Insurance Clearinghouse Program, ("Clearinghouse"). The Clearinghouse assists Citizens' agents with locating private-market insurance coverage for consumers by seeking offers of comparable coverage from participating private-market insurance companies before placing new or renewing existing personal lines insurance policies issued by Citizens.

Since 2022, all new and renewal personal lines insurance policies issued by Citizens and classified as Homeowners-3, Homeowners-6, Dwelling Policy-1, Dwelling Policy-3, policies classified as providing Wind Only coverage; and new business policies providing Mobile Home-3 and Mobile Home Dwelling Policy-1, are eligible to enter the Clearinghouse.

On August 18, 2023, the contract with the "Bolt Clearinghouse" platform expired, and in September 2023, Citizens introduced the Clearinghouse Interim Program Solution (CHIPS) as a replacement platform. This new solution established rules to enforce eligibility requirements for new business submissions and support the process of offering coverage issued by participating private-market insurance companies to renewing Citizens' policyholders.

No exceptions were noted.

Depopulation Program

The Florida Legislature established Citizens' Depopulation Program under Section 627.3511, F.S. The intent of the legislation is to encourage the replacement of the highest possible number of Citizens' policies with policies written by admitted insurers at the admitted insurer's approved rates. The Depopulation Program encourages authorized insurers to assume both personal lines and commercial lines policies from Citizens. Under certain circumstances, eligible policyholders may opt out of an assumption offer from a private insurer.

The examiners reviewed Citizens' 2024 Depopulation Plan, internal processing guide, and 2024 Assumption Agreement to assess compliance with legislatively required changes and orders issued by OIR.

Senate Bill 2A

In December 2022, Senate Bill 2A was enacted and became effective on January 1, 2023. Under the legislation, existing Citizens residential policies with at least one admitted insurer's offer of coverage became ineligible to remain with Citizens if the admitted insurer's premium was within 20% of the renewal premium for comparable coverage. The change in legislation required Citizens to review and update policyholder letters and agent communications, change system logic and create a new way to determine eligibility.

In 2024, OIR added clarifying language to the consent orders issued to admitted insurers when authorizing the assumption of selected personal lines policies from Citizens. The clarifying language precludes authorized insurers from establishing comparable coverage through the offer of additional endorsements; and, at a minimum, the offer of coverage without endorsements must include the same major covered perils at substantially similar levels of coverage as that already provided by Citizens. OIR requires the premium calculation used to determine the 20% eligibility threshold in Section 627.351(6), F.S., to be calculated using offers of coverage that are comparable without the need to offer additional terms or endorsements. To protect Florida policyholders, OIR prohibits admitted insurers from offering policies that are more than 40% higher than the policyholder's estimated renewal premium with Citizens.

The examiners reviewed Citizens' implementation of the requirements of Senate Bill 2A in relation to the Depopulation Program and evaluated Citizens' data files used to generate Depopulation Offer Letters to policyholders to determine the impact of the 40% premium threshold.

No exceptions were noted.

House Bill 1503

In May 2024, House Bill 1503 was enacted and became effective on July 1, 2024. The legislation permits surplus line insurers meeting specified financial requirements to assume policies covering non-primary residences or non-homesteaded dwellings from Citizens. The examiners reviewed Citizens' 2024 Depopulation Plan and 2024 Assumption Agreement, both of which have been updated to include approved surplus lines insurers.

The examiners were unable to review Citizens' implementation of the requirements of House Bill 1503 because, as of the end of the examination scope period, no surplus lines insurer is receiving monthly policy data nor has any applied for an upcoming personal lines assumption.

Comparable Coverage

Section 627.351(6)(c)5.d., F.S., states that for purposes of determining comparable coverage under sub-subparagraphs a., b., and c., the comparison must be based on those forms and coverages that are reasonably comparable. Citizens may rely on a determination of comparable coverage and premium made by the producing agent who submits the application to Citizens, made in the agent's capacity as the corporation's agent. For purposes of comparing the premium for comparable coverage under sub-subparagraphs a., b., and c., premium includes any surcharge or assessment that is actually applied to such policy. A comparison may be made solely of the premium with respect to the main building or structure only on the following basis:

- The same Coverage A or other building limits;
- The same percentage hurricane deductible that applies on an annual basis or that applies to each hurricane for commercial residential property;
- The same percentage of ordinance and law coverage, if the same limit is offered by both Citizens and the authorized insurer or the approved surplus lines insurer;
- The same mitigation credits, to the extent the same types of credits are offered both by Citizens and the authorized insurer or the approved surplus lines insurer;
- The same method for loss payment, such as replacement cost or actual cash value, if the same method is offered both by Citizens and the authorized insurer in accordance with underwriting rules; and
- Any other form or coverage that is reasonably comparable as determined by Citizens' Board.

To date, Citizens' Board has not determined any other form or coverage as additional basis's for reasonably comparable coverage for the purposes of the Depopulation Program.

The examiners compared Citizens' Homeowners-3 coverage worksheets for 16 authorized insurers participating as takeout companies against the following factors, as provided in Section 627.351(6)(c)5.d., F.S.:

- Hurricane deductible percentage for commercial residential property;
- Ordinance or law coverage percentage;
- Mitigation credits; and
- Method for loss payment.

While no exceptions were noted based on the above factors, the examiners identified variations in the Water Loss Limitations section of the authorized insurers' coverage worksheets. Water loss coverage is included in Coverage A of Citizens Homeowners-3 policies, and therefore should be considered when determining comparable coverage and in consideration of the premium for such coverage. The examiners identified certain authorized insurers that impose water loss limitations based on the dwelling's age. Some of these authorized insurers offer an endorsement that would add back to the coverage offered by Citizens for an additional premium. Since this is a recent anomaly addressed in OIR's takeout consent orders issued on and after the October 20, 2024, assumption date, this issue will be added to the factors for review in Citizens' next examination in 2026.

Conclusion

The purpose of this market conduct examination was to determine Citizens' compliance with its plan of operation and its internal operational procedures.

Examination Final Report Submission

OIR hereby issues this final report based upon information from the draft report, additional research conducted by OIR, and additional information provided by Citizens Property Insurance Corporation.



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