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January 9, 2026

MEMORANDUM 2026-1PC

To: All Authorized Insurers Offering Property and/or Casualty Policies in the State of Hawaii

From: Scott K. Saiki, Insurance Commissioner *SKS*

Subject: Extension of Comment Period for General Requirements and Filing Instructions for Property and Casualty Rate, Rule and Form Filings

Due to positive feedback, the Division's revised Property & Casualty ("P&C") rate filing procedures, discussed in Commissioner's Memorandum 2025-10R (issued on November 10, 2025) and 2025-11R (issued on November 24, 2025) have been further refined as follows:

- RF1 Cover Page:
 - Added instructions to submit applicable forms, rather than the entire workbook.
- RF10 General Requirements:
 - Amended Footnote 5 to include limitation to Personal Lines, COMFAL, and Dwelling products.
- RF11 P&C Filing Instructions:
 - Added notation to 5a.C. that clarifying endorsements are exempt from rate impact analysis;

- Added distinction to 5b.D. requirements regarding loss cost impact analysis expectations pertaining to independent coverage restrictions;
- Added limitation of RF14 Forms Worksheet, to applicable sections, for independent forms ONLY;
- Added limitation to 6a.D. to Personal Lines products, COMFAL and Dwelling Fire;
- Reverted 6a.F.v.a. to the existing requirement of justifying all changes which impact the rate level;
- Amended 6a.F.vi. to provide clarity regarding disclosure and possible effects of loss data removal;
- Corrected 6a.F.v.b. reference from “6a.G.v.a.” to “6a.F.v.a.”;
- Added Prohibited Rating Variables and statutory reference for Motor Vehicle in 6a.H.a.;
- Added clarification to 6a.H.c. that risk classification by county is permissible;
- Added language to 6d.E.iv. regarding expected supporting documentation; and
- Added notation to 6d.E.v. reinforcing that period loss ratio can be undeveloped.
- RF12 Rate Summary:
 - Removed DCCE/AOE LOADS table – table 4.
- RF14 Forms Worksheet
 - Added notice that input is limited to independent forms and removed “Independent or Advisory Column”.

The revised materials are titled “Hawaii General Requirements and Filing Instructions v1.1” and are now available on SERFF and at the Insurance Division’s website at https://cca.hawaii.gov/ins/insurers/rate_policy/.

The effective date for the revised General Requirements and Filing is extended to **April 1, 2026**. Insurers must ensure that all filings submitted on or after April 1, 2026, conform to the revised requirements and forms.

Filings submitted prior to April 1, 2026 (including those filings currently pending an approval) are not required to be conformed and re-filed.

For questions, please contact Grant Shintaku by email at insrpapc@dcca.hawaii.gov, or by phone at (808) 586-2809.

The Commissioner acknowledges the Insurance Division P&C staff for their work to modernize the rate filing process.