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INSURANCE COMMISSIONER

July 17, 2026

MEMORANDUM 2026-5PC

To: All Insurers Issuing Pet Insurance Products

From: Scott K. Saiki, Insurance Commissioner SKS

Subject: Hawaii Pet Insurance

The purpose of this memorandum is to clarify that pursuant to Act 79 (SLH 2025), pet insurance is now classified as property insurance.[1]

Prior to the enactment of Act 79, Hawaii customarily classified and regulated pet insurance products as marine and transportation insurance because there was no statutory classification in place. However, Act 79 now makes clear that pet insurance is considered "property insurance." Act 79 defines "pet insurance" as "a **property insurance policy** that provides coverage for accidents and illnesses of pets." *See* HRS §431:33-103 (emphasis added).[2]

Because Act 79 took effect on January 1, 2026, insurers providing pet insurance in Hawaii are expected to review their forms, disclosures, marketing materials, underwriting practices, and administrative procedures to ensure compliance with the new statutory requirements found in HRS §§ 431:33-101 through -109.

To facilitate the transition, the Division will not require insurers to refile, solely for reclassification purposes, pet insurance programs that were filed and accepted before January 1, 2026.

[1] Act 79 became effective on January 1, 2026.

[2] Marine and transportation risk is inapplicable because it protects against loss of or damage to property and financial interests while in transit, *i.e.,* transportation risk. *See* HRS §431:1-207.

Any subsequent filing that revises such a program, including amendments to forms, rates, or rules, should be submitted under the applicable Property Type of Insurance ("TOI") and pet insurance subtype designated in SERFF.

Insurers that are currently writing pet insurance under the Inland Marine TOI should submit all future rate, rule, and form filings for those products under the 01.0003 Pet Insurance within Property TOI in SERFF.

Insurers that previously did not file their pet insurance products based upon an interpretation of an Inland Marine exemption must file their pet insurance products under the 01.0003 Pet Insurance within Property TOI in SERFF on or before December 31, 2026.

Existing insurers that are underwriting pet insurance only with a Hawaii certificate of authority classification of HRS §431:1-207 (Marine and Transportation Insurance) must submit a Uniform Certificate of Authority Application ("UCAA") Corporate Amendment Application to change the certificate of authority classification to HRS §431:1-206 (Property Insurance). Submissions must be made through the National Association of Insurance Commissioners' UCAA portal.

To clarify, pet insurance products will no longer be classified as inland marine insurance for regulatory purposes and insurers should not rely on inland marine-related exemptions.

Questions may be directed as follows:

Pet Insurance Products	Grant Shintaku Property and Casualty Filings Branch insrpapc@dcca.hawaii.gov
UCAA and Certificate of Authority Amendments	Glenn Yamashita Financial Surveillance and Examination Branch inscert@dcca.hawaii.gov.