2025 Insurance Market Report

/Pursuant to Nevada Revised Statute 679B.410

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2025

Contents

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Insurance Commissioner's **Message**

I am pleased to present the 2025 Nevada Insurance Market Report. This report is intended to fulfill the Division of Insurance's (Division) statutory obligation with a detailed update concerning the state's insurance market and key information regarding issues facing Nevada consumers and the insurance industry. Given the pressures resulting in rising costs of capital in the reinsurance market and inflation diminishing margins in the industry, the Division is determined to ensure Nevada's marketplace remains competitive and affordable.

The state's written premium volume grew from $11 billion in 2011 to approximately $30.8 billion by the end of 2024. Nevada's Insurance Premium Tax continues to be the 4th largest contributor to the State General Fund. In Fiscal Year 2023, Insurance Premium Tax collections increased by 3.9% to $515 million, and by 13.4% in Fiscal Year 2024 to $584 million. The Division regulates the 267,361 active licensees operating in Nevada, composed of 250,551 individuals, 16,810 agencies, and 147 captives. The individual licensee pool consists of 24,176 residents and 226,375 non-residents. Agency licensees consist of 2,147 residents and 14,663 non-resident firms. In Nevada there are 1,652 licensed domestic and foreign insurers, 147 captive insurers, 135 sponsored captive cells, 87 self-insured employers (SIE), and 7 active self-insured groups (SIGs). Additionally, there are approximately 160 insurers which compose the state's non-admitted market, known as surplus-lines insurance. (Figures are as of October 2024).

> "The Division is determined to **ensure Nevada's marketplace** remains **competitive** and **affordable.**

The Division of Insurance is first and foremost the preeminent insurance consumer protection agency. Division staff work to provide a secure, competitive market for Nevada consumers, conducting insurer examinations and analyzing insurer solvency of carriers domiciled in the state. Division staff review and approve filed rates for certain lines, review insurance contract forms, and analyze consumer interactions with carriers. For Fiscal Years 2023 and 2024, the Division's Consumer Services section handled approximately 25,000 consumer inquiries and investigated 7,167 consumer complaints. Through its efforts, the Division recovered $14,742,268.51 for Nevada insurance consumers.

Nevada's health insurance market continues to experience stable growth. In 2018, 2 carriers offered individual coverage statewide and only 1 carrier offered coverage in rural counties. For Plan Year 2025 the Silver State Health Insurance Exchange (SSHIX) now has 8 carriers offering 141 plans and the total individual health insurance market has 11 carriers with 185 plans available. This market segment's plan offerings have grown 13.5% from 2023 compared to the 163 plans for Nevada consumers to choose from previously. The average rate increases for the individual market were 2.9% for Plan Year 2024 and 7.11% for Plan Year 2025. Previous plan year rate increases ranged between 4.4 - 9.0% (4.4, 9, 4.9, and 7.4 for plan years 2020-2023, respectively).

Over the past two years, there has been a national trend of rate increases and retraction in coverage exposure in the property and casualty market due to historically high losses due to natural disasters around the globe such as hurricanes, floods, earthquakes, and wildfires. The Division has proactively issued robust data calls and engaged in subsequent regular meetings with industry representatives to balance rate increase requests, ensure fair and adequate coverage options, and continue to foster a competitive market. Nevada's property and casualty insurance market continues to be competitive, with numerous carriers offering coverage in our state.

The Division's previous report had identified an upward trend in the number of increased rate request filings in the automobile insurance market because of worsening loss experience. The Division has been diligent in analyzing the myriad factors fueling this trend. The Division performs a robust review of all rate change requests while approving adequate and substantiated rates. To supplement these efforts, the Division hosted a public forum on auto insurance rates in Nevada during November 2023 featuring industry experts and Division representatives presenting a thorough explanation of the factors impacting this trend. A recording of this forum is available with other automobile insurance resources on the Division's website.

The Division updates consumer guides and pricing comparisons annually to enhance Nevada consumers' knowledge of various insurance policies. Consumer guides are available on the Division's website in the following areas: Automobile, Homeowner, Health, Earthquake, Flood, and Title Insurance. In addition, each year, the Division's staff participates in public outreach programs to educate the public on insurance, safety, and risk mitigation strategies. The Division has also developed robust online look-up tools for automobile, homeowners, and commercial habitational properties to allow consumers instant access to review carrier options, proposed and approved rate filings, and dates when policies take effect and rates last changed.

Details on these topics, as well as information expounding on Nevada's current insurance market, are included in this report. For additional information I encourage everyone to visit the Division's website, doi.nv.gov, for additional details on any of the topics described in this report. I encourage you to contact me if you would like to discuss any issue in greater detail as you work to address your constituents' concerns during the 83rd (2025) Legislative Session.

Sincerely,

Scott J. Kipper
Insurance Commissioner

State of **Regulation**

Safeguarding Consumers and Ensuring Market Stability

The Nevada Division of Insurance plays a critical role in protecting consumers and maintaining the stability of the state's insurance market. The Division's primary goals are twofold: ensuring the solvency of insurance carriers operating in Nevada so they can meet their commitments to policyholders and regulating the market to ensure fair treatment of policyholders and claimants. The Division's work ensures a competitive and reliable insurance market for the benefit of all Nevadans.

Historical Framework of State Regulation

The foundation for state regulation of insurance began in 1851 when New Hampshire appointed the first state insurance commissioner. Unlike other financial services industries like banking and securities, which are primarily regulated by the federal government, insurance has long been the domain of state oversight. This was reinforced in 1945 when Nevada U.S. Senator Pat McCarran co-sponsored the McCarran-Ferguson Act, affirming that state regulation and taxation of insurance was in the public's best interest.

The significance of this state-based framework was reaffirmed by the 1999 Gramm-Leach-Bliley Act (GLBA), which allowed affiliations between banks, securities firms, and insurance companies while upholding the states' role in regulating the insurance sector. GLBA also called for states to enhance regulatory efficiency, urging more uniformity in insurance laws to improve market access and competition.

The 2008 Financial Crisis and the Strength of State-Based Insurance Regulation

The 2008–2009 financial crisis underscored the resilience of the insurance industry under state-based regulation, particularly in contrast to the severe impacts on other financial sectors. This relative stability was achieved through state insurance statutes and regulations that prioritize solvency, maintain strict oversight, and protect consumers from speculative risks.

Before and during the financial crisis, the National Association of Insurance Commissioners (NAIC) developed rigorous solvency requirements, with state regulators enforcing and maintaining critical direct oversight. This approach helped prevent widespread insurer insolvencies and ensured strong policyholder protections during the economic downturn, showcasing the resilience of the insurance regulatory system.

Building on this foundation, the Nevada Division of Insurance works closely with the NAIC to adopt best practices and align state regulations with national standards. By actively participating in NAIC councils and committees, the Division contributes to shaping oversight strategies that balance consumer protection with insurer solvency. The 2008–2009 financial crisis serves as a testament to the significance of this collaboration, as Nevada's adherence to NAIC standards played a key role in limiting the crisis's impact on the insurance industry. This partnership continues to bolster the state's ability to maintain a stable, consumer-focused insurance market while adapting to emerging challenges.

Following the crisis, the Federal Government Accountability Office (GAO) recognized that this state-regulated structure effectively safeguarded policyholders and preserved industry stability, reducing the need for costly bailouts. Industry leaders have since emphasized that applying bank-style federal oversight to insurers would disrupt a system specifically designed to address insurance-related risks.

State-based regulation also supports innovation within a secure framework. State insurance regulatory agencies, like Nevada's Division of Insurance, advance local market solutions that protect consumers and uphold strict solvency standards. This regulatory model continues to underpin a stable, competitive insurance market, fostering a balanced environment that encourages industry growth while ensuring strong consumer safeguards.

Oversight and National Collaboration

Today, over 1,600 insurance carriers are licensed to conduct business in Nevada, the majority of which are domiciled in other states. These carriers are regulated through a reciprocal solvency oversight framework shared by all U.S. states and territories. The Nevada Division of Insurance works closely with other states to oversee carrier solvency, ensuring that companies remain financially sound and able to fulfill their obligations.

The National Association of Insurance Commissioners is governed by the insurance commissioners from the 50 states, the District of Columbia, and five U.S. territories. Through the NAIC, commissioners work together sharing information and market data to develop a regulatory body of model laws and regulations that provides increased uniformity, collaboration, and best practices to foster more efficient markets and better consumer advocacy. Nevada is a fully accredited member of the NAIC. These models promote consistency across states, improving regulatory efficiency and strengthening consumer protections.

Title 57 of the Nevada Revised Statutes (NRS), and related insurance regulations, contain language created through the NAIC model language development process. The Division's omnibus bill traditionally proposes changes to Nevada's statutes that include language taken from NAIC model laws and regulations, as well as model law language developed by the National Council of Insurance Legislators (NCOIL), and the National Conference of State Legislatures (NCSL).

Ensuring Financial Stability

Financial solvency regulation is central to consumer protection. The Division conducts quarterly and annual financial reviews of all licensed domestic insurance companies, with more detailed financial examinations occurring every five years. These reviews are essential for detecting any financial instability that could jeopardize policyholders. By sharing data and analysis with other states through the NAIC, Nevada contributes to a collaborative regulatory system that reduces regulatory costs while maintaining solvency protections.

The NAIC's accreditation program, which sets rigorous standards for financial oversight, further supports this system. Nevada's Division of Insurance undergoes a comprehensive audit every five years to ensure it has the resources, trained staff, and statutory authority needed to regulate insurance companies effectively. The Division enjoys a fully accredited status.

Enhancing Market Efficiency

In addition to ensuring carrier solvency, the Division plays a vital role in market regulation. As a member of the Interstate Insurance Product Regulation Commission (IIPRC) through its partnership with the NAIC, Nevada contributes to the development of uniform product standards for life insurance, annuities, disability income, and long-term care insurance. This partnership streamlines the approval process for certain insurance products, allowing Nevada consumers faster access to competitive insurance offerings while maintaining strong consumer protections.

Administration's Role

As an executive agency within the Department of Business and Industry, the Nevada Division of Insurance serves as the regulatory authority for Nevada's insurance market. The Division is instrumental in advancing the Governor Lombardo's goal of maintaining a business-friendly environment while upholding the consumer protections outlined in its mission.

An enterprise-funded agency, the Division operates independently of the state's General Fund, drawing operating revenue from fees and assessments. This funding model supports the administration's focus on economic growth, ensuring a stable and competitive insurance market where consumers benefit from comprehensive regulatory protections and resources the Division is chartered to provide.

> “The Division is **instrumental** in **advancing Governor Lombardo's goal** of **maintaining a business-friendly** environment while **upholding** the **consumer protections** outlined in its mission.

2025 Legislative **Priorities**

Refining Focus over Major Market Reform

For the 2025 legislative session, the Nevada Division of Insurance proposal focuses on refining current statutes rather than major market reforms. The Division has submitted one bill draft request aimed at resolving existing inconsistencies, errors, and other areas for improvement. A significant aspect of this bill includes the adoption of various model laws developed by the National Association of Insurance Commissioners (NAIC) that Nevada has either never implemented, partially adopted, or has not updated since the adoption of prior versions.

Among the key provisions, the Division proposes adopting the updated NAIC Model Law 693, the Market Conduct Surveillance Model Law, (which supplements the already adopted portions of NAIC Model Law 390, codified in NRS Chapter 679B). Model Law 693 will enhance and clarify market conduct provisions. The Division proposes moving the examination statutes out of Chapter 679B into a new chapter within the Nevada Revised Statutes (NRS), incorporating both Model Laws 390 and 693 to clarify regulatory authority. A substantial portion of the Division's proposal will also implement conforming corrections across Title 57.

The bill further seeks updates to Chapter 686A of NRS, which addresses Trade Practices and Frauds. Many provisions in this chapter have remained unchanged since their adoption in the 1970s. The proposed updates will align with changes and additions in NAIC Model Law 880, the Unfair Trade Practices Act, and the NAIC Model Laws 895 through 898, which address unfair discrimination protections for subjects of abuse in health benefit plans, life insurance, disability income insurance, and property and casualty insurance.

Another large portion of the requested bill will address the harmonization and simplification of health benefit mandates across Title 57, including standardizing definitions and eliminating redundancies. The Division has noted that over the years statutes have been added that contain slightly contradictory definitions of the same term and contain unnecessarily duplicative or repetitive definitions of the same term.

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The Division will also actively engage with legislators on the subject of health benefit mandates. The Centers for Medicare and Medicaid Services (CMS) and the Center for Consumer Information and Insurance Oversight (CCIIO) have increased efforts to help states identify health benefit mandates exceeding the Essential Health Benefits package. Recent CMS/CCIIO regulations place cost-defrayal requirements on states for these benefits, and the Division anticipates further dialogue on this issue during the session.

Other updates in the Division's bill request include miscellaneous changes that aim to improve regulatory clarity and effectiveness, such as:

Repealing duplicative insurance adjuster license types;

Aligning insolvency definitions for self-insured employers with those for associations of self-insured employers within the workers' compensation context;

Updating the minimum capital requirements for new insurers (unchanged since 1991);

Allowing licensed administrators to use alternative accounting methods beyond U.S. GAAP, pending approval by the Commissioner;

Prohibiting insurers from taking depreciation on items that do not depreciate in property insurance settlements;

Modernizing the prior approval processes for medical and dental insurance;

Adding protections against policy cancellations or premium increases due to inquiries or no-fault claims on auto insurance policies.

Impacts of **Growing** Insurance Premiums on Nevada's Insurance Market

In recent years, Nevada, along with the rest of the nation, has experienced significant upward pressure on home and auto insurance premiums. Two key factors are driving these increases. Substantial losses have been incurred by insurers and reinsurers around the world over the past decade, particularly due to catastrophic events like wildfires and hurricanes. These natural disasters have resulted in heightened risks and greater claims. This has forced many insurers and reinsurers to reassess their exposure, reduce their coverage, and / or raise reinsurance rates to better manage future risk.

Commercial Habitational Policies Issued	19,315
Non-Renewals or Cancellations directly attributed to Wildfire Risk	1,475
Applications for Coverage Received	13,771
Declined Due to Wildfire Risk	51

2023

Additionally, the increased cost of goods, materials, and labor—used in repairing homes, vehicles, and other insured property—has further contributed to the need for insurers to adjust their premiums. These costs, combined with the necessity to cover losses and maintain financial stability, have placed substantial pressure on insurance rates.

Impact of Wildfire Risk on Homeowners Insurance

Homeowners in wildfire-prone areas of Nevada are seeing increased non-renewals due to wildfire exposure, with 481 homeowners' insurance policies non-renewed in 2023. While this reflects broader national wildfire trends, Nevada-specific factors also come into play, such as its unique geographic risk profile and limited historical wildfire damage. The Division's regulatory framework prohibits insurers from using predictive model outputs as the sole reason for denying or non-renewing policies without factoring in these mitigation steps.

To help homeowners navigate these challenges, the Nevada Division of Insurance has launched tools such as the Homeowner Coverage Tool and Commercial Habitational Property Tool, which assist consumers in finding available options for home and commercial habitational property insurance by ZIP code, even in wildfire-prone areas.

The Division encourages insurers to account for mitigation efforts taken by homeowners before denying or non-renewing policies, particularly in areas prone to wildfire risk. As part of the Nevada Personal-Lines Property Insurance Wildfire Mitigation Incentive Program, developed in response to NRS 679B.129, insurers are encouraged to offer voluntary incentives to property owners who take proactive measures to reduce wildfire risk. These efforts, such as creating defensible space, using fire-resistant building materials, and implementing community-level mitigation plans, are elements of the program. This voluntary program promotes fairness for homeowners who invest in reducing their exposure to wildfire risk, recognizing their efforts in mitigating potential losses.

The growing concern over wildfire risk is becoming an increasingly important factor in the availability and cost of homeowners insurance across Nevada. According to the Nevada Division of Insurance's 2024 Commercial Habitational Insurance Data Call, insurers reported that wildfire risk had a direct impact on policy availability in 2023. Of the 19,315 commercial habitational policies issued, 1,457 were canceled or non-renewed, with 22 directly attributed to wildfire risk. Similarly, of the 13,771 applications for coverage received, 51 were declined due to wildfire risk. This trend has continued into 2024, where certain areas, such as Incline Village and Stateline, have seen wildfire-related policy non-renewals rise significantly.

Automotive Insurance Rate Increases

Automotive insurance rates in Nevada are rising due to various factors, including rising expenses for new and used automobiles. There are significantly increased repair costs for newer-model vehicles equipped with complex technological components. Additional influences on rates include increased insurance fraud, litigation costs, and poor driving habits such as inattentive and aggressive driving. Nevada has also experienced substantial population growth in recent years, leading to a rise in average miles driven and traffic congestion, especially in urban areas like Las Vegas.

The Division of Insurance carefully analyzes proposed rate changes to ensure they are not excessive or unfairly discriminatory while ensuring they are adequate to maintain insurer solvency. It is important to balance affordability with maintaining a competitive and viable insurance market in the state.

In response to consumer concerns, the Division held a public forum in November 2023 to discuss the factors driving automobile insurance rates and provide transparency on the rate review process. The recording is available on the Division's website.

The Division's Role and Proactive Efforts

The Nevada Division of Insurance plays a proactive role in addressing the challenges facing Nevada's insurance market. Through initiatives like the 2024 Commercial Habitational Insurance Data Call, the Division gathered and synthesized data from 104 insurance companies, providing a comprehensive understanding of the wildfire-related factors impacting premiums and policy availability. This data-driven approach allows the Division to provide insightful actuarial analysis, contributing to a viable, stable, and competitive insurance market for Nevada's residents. The Division's analysis is critical in maintaining a balance between the financial stability of insurers and fairness to consumers.

The Division's unique authority to pre-approve rate changes—a power that not all state insurance regulators possess—protects Nevadans from excessive or unfair premium increases. Through this rigorous process, the Division evaluates a wide array of factors, including past profitability, future risk projections, and mitigation efforts, ensuring that the rates reflect true market conditions and consumer protection. This proactive regulation helps stabilize the market, allowing insurers to operate sustainably while providing Nevadans with the coverage they need.

Recovered on Behalf of Nevada Consumers

$7.8million 2024

In 2024 alone, the Division's Consumer Services Section played a vital role in recovering over $7.8 million on behalf of Nevada citizens, demonstrating its commitment to protecting consumers. By responding to claims disputes and advocating for policyholders, the Division's Consumer Services Section ensures that Nevadans receive the benefits they are entitled to, further solidifying the Division's role as a key advocate for fair treatment within the insurance industry.

Overview of the Nevada Insurance Market

Nevada's insurance market is composed of 1,652 licensed domestic and foreign insurers, 147 captive insurers, 135 sponsored captive cells, 87 self-insured employers (SIE), and 7 active self-insured groups (SIGs). 160 insurers compose the state's non-admitted market, known as surplus-lines insurance as of October 2024.

The NAIC divides Nevada's insurance market into three segments: health, property and casualty, and life/annuities (including accident and limited health products). From 2021 to 2023, Nevada's market experienced steady growth, with written premiums by segment as follows: Health – 39%, Property and Casualty – 33%, Life/Accident/Limited Health Products – 28%.

The following chart reflects 2023 written premiums, by line of insurance, for policies written to Nevada consumers and businesses.

Nevada saw a reduction in written insurance premiums during the Great Recession in 2009-2010. These premium levels have increased every year since. Over the past 10 years, they have grown by 91.3%, adding over $10 billion, and reaching a total of $30 billion in 2024. Insurance Premium Tax collections have mirrored this growth, rising from $236.8 million in Fiscal Year 2012 to $584 million in Fiscal Year 2024. In Fiscal Year 2023, collections increased by 3.9% to $515 million, followed by a 13.4% increase in Fiscal Year 2024.

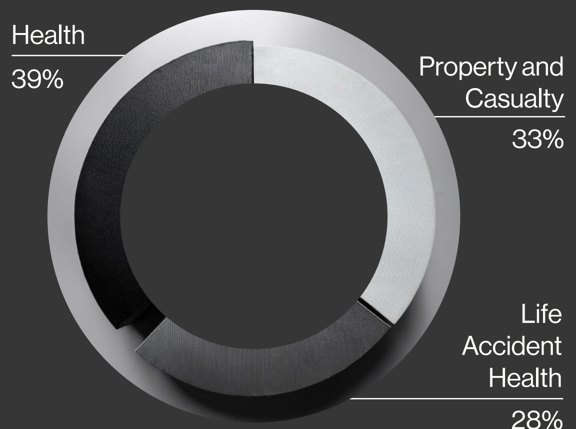
The chart on the next page reflects the 10-year history of direct written premiums in Nevada. Taxes on insurance written premiums provide the State's 4th largest source of revenue to the General Fund.

Nevada Property and Casualty Direct Premiums Written

Statement Type	Statement Type	% of Market
Health	$10,248,275,422	39%
Life, Accident, Health	$7,154,000,000	28%
Property and Casualty	$8,561,822,012	33%
Total Nevada	$25,964,097,434	100%

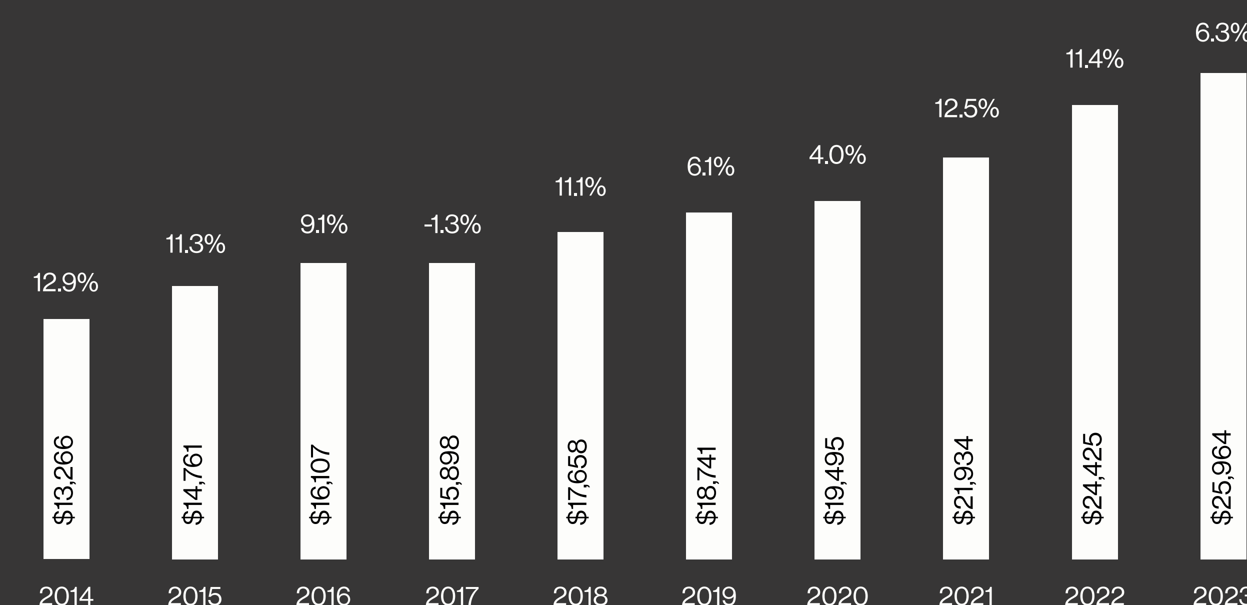
Source: National Association of Insurance Commissioners

2023 Written Premiums by Line of Insurance



"Taxes on insurance written premiums provides the State's **4th largest** source of **revenue** to the **General Fund.**

10-year History of Direct Written Premiums in Nevada in Millions of Dollars



Nevada's **Health Insurance** Market

The Nevada Division of Insurance plays a critical role in maintaining the quality and stability of the state's insurance industry to ensure that Nevadans receive fair and equitable insurance coverage. The Division's role spans across a variety of insurance types, with health insurance historically representing the largest segment of direct written premiums accounting for roughly 39% of the state's total premiums. Premiums have increased Year over Year from $9,475,300,117 in 2022 to $10,248,275,422 in 2023.

Ensuring that Nevadans have access to a robust network of healthcare providers through their insurance plans is a key responsibility of the Division. The Division regulates provider networks within the individual and small group markets and works with the Nevada Network Adequacy Advisory Council to develop standards that reflect the needs of Nevada's diverse population. The Council has made recommendations to increase access to essential community providers (ECPs) and has advocated for workforce development initiatives to address provider shortages in rural and underserved areas.

The Division is responsible for reviewing, analyzing, and approving rates for a wide range of insurance products, including health benefit plans, life insurance, annuities, and more specialized coverages like accidental death, credit insurance, and long-term care. The Division carefully monitors rate and form filings to ensure a competitive and stable marketplace for consumers. The insurance products under the Division's purview are regulated by over 25 different chapters of the Nevada Revised Statutes (NRS). Notably, life and health insurance products must adhere to NRS 686B.050, ensuring that rates are not inadequate, excessive, or unfairly discriminatory.

While the Division closely monitors the individual and small group markets, it does not have direct regulatory authority over large group health insurance premiums. Additionally, self-insured employer health plans, which fall under the federal Employee Retirement Income Security Act (ERISA), are generally outside the Division's jurisdiction.

Year over Year Premium Increase in Billions

9.475	2022
10.248	2023

Percentage of Total Written Premiums in Nevada

39%	2022
33%	2023

Individual Market Enrollment

123,464	2022
126,456	2023

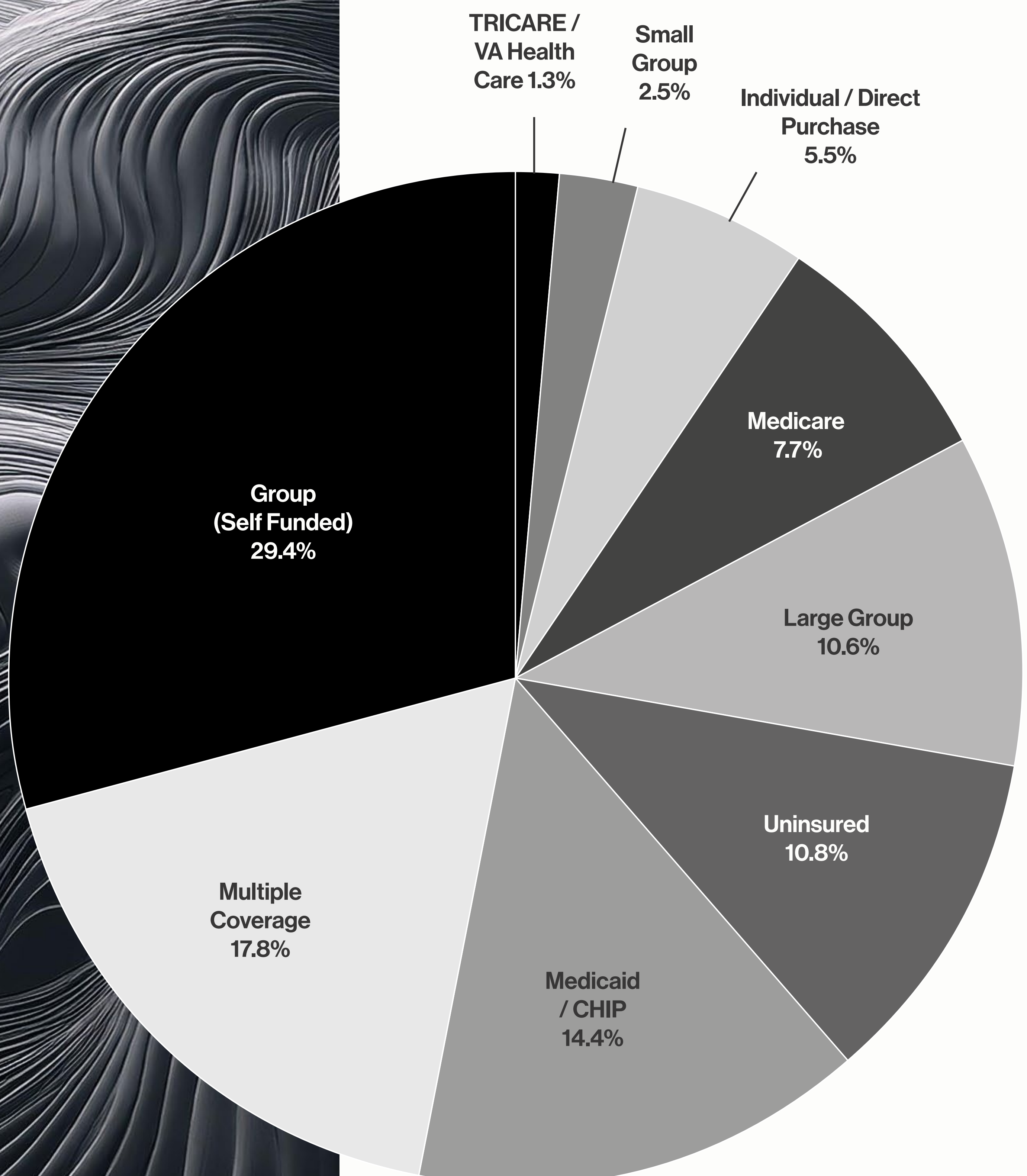
In collaboration with the Silver State Health Insurance Exchange (SSHIX), the Division also oversees plan management tasks. This includes approving rates, (including analysis of terms included in insurance forms and binders detailing policies) that align with federal guidelines and ensuring they meet the validation requirements of the Health Insurance Oversight System (HIOS). The Division works to align state deadlines with federal guidelines to guarantee timely completion of reviews, ensuring a smooth open enrollment period for Nevadans.

Nevada's Medicaid program is administered by the Nevada Department of Health and Human Services and Medicare is federally managed. The Division plays an important role in ensuring financial solvency for Medicare Advantage plans and Medicaid Managed Care Organizations (MCOs). MCOs deliver health benefits and services to Medicaid beneficiaries through state contracts, receiving a monthly per-member payment to provide comprehensive care. In some cases, these benefits include long-term support, helping to improve care access, predict budgets, and control Medicaid spending. Additionally, long-term care insurance, which has been subject to volatility due to rising medical costs, is an area of ongoing regulatory attention.

The Nevada Division of Insurance remains a crucial partner for the legislature in ensuring that the state's insurance market remains fair, competitive, and responsive to the needs of its residents. By regulating health insurance, promoting access to care, and addressing emerging challenges like long-term care and provider shortages, the Division continues to protect the interests of Nevadans while collaborating with both state and federal agencies.

Population / Coverage Category	Estimated Member Count	Member Count as a Percentage of Total State Population	Data Source
Total Estimated Population in Nevada	3,194,000	100%	U.S. Census Bureau
Individual / Direct Purchase	176,000	5.5%	U.S. Census Bureau
Small Group	80,000	2.5%	NAIC I-Site
Large Group	340,000	11.2%	NAIC I-Site
Group (Self-Funded)	938,000	38.6%	Census Bureau
Medicaid / CHIP	459,000	25.3%	U.S. Census Bureau
Medicare	246,000	7.7%	U.S. Census Bureau
TRICARE / VA Health Care (other public)	42,000	1.3%	U.S. Census Bureau
Multiple Coverage	568,000	17.8%	U.S. Census Bureau
Uninsured Estimate	345,000	10.8%	U.S. Census Bureau
Total Covered Population	**2,849,000**	**89.2%**	

2023 Written Premiums by Line of Insurance



Nevada Individual Health Market

The individual health insurance market in Nevada has undergone significant changes since the implementation of the Affordable Care Act (ACA) in 2014. The ACA dramatically altered the landscape by introducing requirements establishing 10 categories of services health insurance plans must cover, including doctor's services, inpatient and outpatient hospital care, prescription drug coverage, pregnancy and childbirth services, mental health services, and more. Additional factors, like guaranteed issue, premium subsidies, and prohibitions against pre-existing condition exclusions, made health insurance more accessible for many Nevadans.

In 2014, when Nevada implemented provisions of the Patient Protection and Affordable Care Act, it was impossible to know what impact the ACA would have on the individual market. The ACA's requirements of guaranteed issue, premium subsidies, and other cost-sharing protections and mandated benefits dramatically changed the makeup of Nevada's individual health insurance market. After an initial surge, enrollment declined due to the removal of the individual mandate, which was a provision within the Affordable Care Act that required individuals to purchase minimum essential coverage – or face a tax penalty – unless they were eligible for an exemption.

On-exchange plans are defined as ACA compliant plans purchased through the state-based health insurance exchange, SSHIX, or HealthCare.gov. Off-exchange plans are also required to be ACA compliant but are purchased directly from an insurance provider or through a broker. Where off-exchange enrollment dominated the individual market in the early years, by 2022, on-exchange enrollment constituted 80% of the market. This shift was driven by the availability of premium subsidies for exchange-based plans, as well as additional financial assistance provided through the American Rescue Plan Act (ARPA) in 2021, which extended eligibility for ACA health insurance subsidies to people buying their own health coverage on the marketplace who have incomes over 400% of poverty. The data in Exhibit I shows premiums and enrollment numbers from 2017 to 2023.

Enrollment numbers have averaged around 116,000 during the period of 2014 - 2021, peaking at 143,257 members at the end of 2016. Member numbers dropped after 2016 when the ACA's individual mandate was removed and continued to drop through 2019, with total members settling at 108,974. Referenced earlier in the report, the pandemic affected the individual market enrollment with a trend of increased enrollment of 5.6% in 2020 and 18.7% in 2021. There was a small decline from the 129,350 members in 2021 of -4.55% to 123,464 members in 2022. However, for 2023, members increased 2.4% to 126,456 members. This suggests a post pandemic stabilization that retains a higher number of overall participants compared to the 2014 – 2021.

Exhibit II displays Nevada's 2017-2023 individual market statistics by rating area, and it includes the number of carriers in the Off-Exchange and On-Exchange markets, sample monthly rates, and the average annual approved statewide rate increases. The exhibit documents the evolution of the State's individual market. Over the years, there has been a shift in enrollment from the Off-Exchange to the On-Exchange market. At the beginning of Plan Year 2014, Off-Exchange enrollment made up roughly 70% of the individual market compared to 30% On-Exchange. As of 2024, On-Exchange enrollment now comprises roughly 80% of the total individual market.

Several factors have impacted individual market enrollment since 2016 and the shift from

Off-Exchange to On-Exchange plans. The ACA provides premium subsidies for plans purchased through a health insurance exchange for families whose income does not exceed 400% of the federal poverty level. Subsidies have made exchange-based health insurance policies much more affordable for those that qualify. The pandemic also played a role in the enrollment increase because Nevadans who were laid off or no longer eligible for employer sponsored insurance turned to the individual market.

Another contributor to this increase was the passage of ARPA, which was signed into law on March 11, 2021. ARPA increased subsidies, which allowed Nevadans who were already receiving a subsidy to further reduce their monthly health insurance costs and removed the upper income eligibility requirement of 400% of federal poverty level. While the expanded subsidies were set to expire on December 31st, 2022, the Inflation Reduction Act of 2022, which was signed into law on August 16, 2022, extended the subsidies under ARPA until the end of 2025. Prior to the ARPA expanded subsidies, in Plan Year 2020, 85% of enrollees were receiving subsidies. That number increased to 90% for Plan Year 2021. For Plan Year 2022, about 89% of enrollees in the federal marketplace received subsidies, nearly maintaining the rate seen in Plan Year 2021 after the expanded subsidies from the American Rescue Plan Act (ARPA) took effect. By Plan Year 2023, approximately 90% of enrollees continued to receive subsidies under these provisions. This high subsidy uptake highlights how ARPA's enhancements, extended by the Inflation Reduction Act, have kept coverage affordable for a significant portion of enrollees, especially by capping contributions for those with incomes over 400% of the federal poverty level at 8.5% of household income.

Individual Market Enrollment	123k	2022
	126k	2023

On-Exchange Enrollment as share of Individual Market	30%	2014
	80%	2023

In addition to subsidies, the ACA provides for guaranteed issue policies and a prohibition against pre-existing condition exclusions for all individual health benefit plans. These requirements were new to the individual market, and, in the early years of the ACA, carriers faced substantial challenges in properly rating their insured pools. Exhibit II illustrates these challenges, which are reflected by the steady climb in approved rate increases in the ACA's early years. While 2015 and 2016 heralded modest increases of 4.95% and 8.9%, respectively, approved rate changes peaked at 31.6% in 2018 because of adverse loss experience. In recent years, premiums have relatively stabilized, with overall average rate increases below 5% from 2019 through 2022. The Plan Year 2023 average rate increase was 9%; however, approximately 4% of that change was caused by one carrier's rate increases. Based on the rate submissions received by the Division for 2025 plans, the overall individual market has a proposed average rate increase of 7.11% with a total of eleven companies and 185 plans from which consumers can choose. Of those plans, 141 will be available to consumers through the Exchange.

As the individual market continues to stabilize, additional carriers have begun offering plans in Nevada. Since the lows of 2018, participation On-Exchange has increased from 2 carriers in 2018 to 6 carriers in 2023 for Rating Areas 1 and 2, which encompasses Clark, Nye, and Washoe Counties. Carriers in Rating Area 3, which includes Carson City, Douglas, Lyon, and Storey Counties, has increased from 1 carrier to 4. The remaining counties in the State now offer 3 carriers, up from 1 carrier in 2018. The addition of new carriers provides more options for Nevadans, especially in the State's rural areas.

For Plan Year 2025, On-Exchange plans are being offered as follows: Clark and Nye Counties will have the choice of 81 plans, Washoe County will have the choice of 69 plans, Carson City, Douglas, Lyon, and Storey Counties will have the choice of 49 plans, and 45 plans will be available for the State's remaining counties. Further, 34 Off-Exchange plans are being offered in Washoe County, 40 in Clark County, 23 in Carson City, Douglas, Storey and Lyon Counties, 27 in Nye County, and 14 plans in the remaining counties.

Small Group Market

Nevada's small group market, which covers employers with 2 to 50 employees, has remained relatively stable over the years. However, covered lives have decreased in recent years as small businesses seek alternative coverage options, such as self-funded plans or association health plans. For 2023, the Small Group Market included 78,649 Nevadans, 2.5% of the total state population.

Nevada's small group market remained relatively stable from 2014 to 2017 as the number of covered lives remained at roughly 95,000. Covered lives decreased in 2018 to 90,719 and further to 79,788 by 2019. In 2020, covered lives grew by 4.9% to 83,663, with little change to 83,340 in 2021, and slight decline to 81,943. As of 2023, the covered lives have reached their lowest number since 2014, at 78,649. The reduction trend in covered lives continues as small employers search for options more affordable than the traditional fully funded small group market.

Some small business employers are turning to alternatives such as: Qualified Small Employer Health Reimbursement Arrangements, which allow small employers to provide reimbursement of certain employee health care expenses, including individual health insurance premiums; Association Health Plans, which allow small business employers with common interests to purchase fully insured, large group health plans through associations; and self-funded health plans. The estimated number of Nevadans covered through self-funded plans continues to grow, increasing from 1,122,684 in 2021 to 1,178,896 in 2022 up to

Covered Lives	95,879	2017
Written Premiums	$444,838,241	
Covered Lives	90,719	2018
Written Premiums	$494,110,505	
Covered Lives	79,788	2019
Written Premiums	$426,665,240	
Covered Lives	83,663	2020
Written Premiums	$404,612,130	
Covered Lives	83,340	2021
Written Premiums	$466,759,660	
Covered Lives	81,943	2022
Written Premiums	$342,440,916	
Covered Lives	78,649	2023
Written Premiums	$338,383,858	

Source: NAIC i-Site

1,233,472 in 2023. Nevada's small group covered lives and written premiums totals were as follows:

Fully Insured Large Group Market

The large group market, which covers employers with 51 or more employees, has experienced an overall decline in covered lives but has seen a modest premium growth, reflecting broader national trends in employer-sponsored insurance. For 2023, the Large Group Market included 356,706 Nevadans, 11.2% of the total state population.

The State's fully insured large group market has experienced an overall decrease of -6.4% in covered lives since 2015; however, data show a modest increase of 1.4% over 2020. Written premiums significantly increased since 2015, growing from $1,589,732,026 in 2015 to $1,893,446,619 in 2021. Since 2021, covered lives decreased 2.3% in

Year	Covered Lives	Written Premiums
2017	390,000	$1,708,765,030
2018	383,626	$1,723,428,142
2019	396,469	$1,832,807,002
2020	374,652	$1,888,388,757
2021	379,981	$1,893,466,619
2022	371,018	$1,550,489,291
2023	356,706	$1,534,711,854

Source: NAIC i-Site

2022 to 371,018 with $1,550,489,291 in premiums, and further decrease of 3.8% in 2023 to 356,706 covered lives with $1,534,711,854 in premiums.

Medical Loss Ratio – Nevada Policyholder Rebates

The ACA includes a Medical Loss Ratio (MLR) requirement, where health insurance carriers in the individual, small group, and large group markets are required to spend at least 80% (individual) and 85% (small and large groups), respectively, of their premium income on medical care and health care quality improvement; leaving the remaining 20% or 15% for administration, marketing, and profit. Carriers are required to price their products well in advance of the plan year, and their rates are based upon projected loss experience. Some carriers' plans' actual loss experience was below the ACA mandated medical loss ratio benchmarks, so premium rebates were issued to Nevada policyholders. Total premiums rebated to Nevada policyholders in 2014 through 2023 were as follows:

“Carriers are required to price their products **well in advance** of the **plan year,** and their rates are based upon **projected loss experience.**

	All Markets	Individual	Small Group	Large Group
2014	$4,049,168	$730,712	$2,900,801	$417,655
2015	$3,797,839	$304,236	$3,444,511	$49,092
2016	$6,243,165	$67,583	$4,055,811	$2,119,771
2017	$4,689,070	$0	$4,032,525	$656,545
2018	$6,451,083	$0	$6,432,012	$19,071
2019	$8,680,429	$9,819	$7,494,112	$1,176,499
2020	$14,383,246	$5,338,467	$6,342,430	$2,702,349
2021	$10,443,945	$3,506,856	$3,875,238	$3,061,851
2022	$2,951,144	$2,918,773	$0	$32,371
2023	$9,302,078	$4,153,879	$3,776,362	$1,371,837

Source: https://www.cms.gov/CCIIO/Resources/Data-Resources/mlr

Rate Review

In accordance with ACA provisions, the Centers for Medicare and Medicaid Service ("CMS") designated Nevada an effective rate review state. As an effective rate review state, Nevada must conduct reviews of proposed rates as follows:
- Gather sufficient data and documentation concerning rate increases to conduct an examination of proposed increase reasonableness.
- Consider the factors they apply to the review
  - Medical cost trend changes by major service categories
  - Changes in services utilization (i.e., hospital care, pharmaceuticals, doctors' office visits) by major service categories, benefits and enrollee risk profile
  - Cost-sharing changes by major service categories
  - Impact of over- or under-estimate of medical trend in previous years on the current rate
  - Administrative costs related to programs that improve health care quality
  - Applicable taxes and licensing or regulatory fees
  - The impacts of geographic factors and variations, changes within a single risk pool to all products or plans within the risk pool; and the impact of reinsurance and risk adjustment payments and charges under sections 1341 and 1343 of the ACA
- Determine the reasonableness of the rate increase under a standard set forth in state statute or regulation.
- Post either rate filings under review or rate filing justifications on the state website or post a link to the rate filing justification information on the CMS website.
- Provide a mechanism for receiving public comments on proposed rate increases.
- Report rate review results to CMS for rate increases subject to review.

Network Adequacy

The Division regulates provider networks maintained within the individual and small employer health insurance markets. Nevada Administrative Code 687B.770 established the Network Adequacy Advisory Council (Council) to recommend additional or alternative standards for determining network adequacy. Since its inception in 2016, the Council has added standards for pediatrics and individual mental health providers, increased the requirements related to Essential Community Providers (ECP), and recommended the incorporation of network adequacy standards into Nevada regulation—a move away from simply referencing CMS standards.

The four public meetings for Plan Year 2026, held between April 2024 and September 2024, culminated with a report submitted to the Chief Deputy Commissioner on September 13, 2024. The latest report included the Council's recommendation to unanimously approve applying the Federal 2026 Network Adequacy Standards to Nevada Qualified Health Plans. The council unanimously disapproved applying the Federal 2026 Network Adequacy Standards to Nevada non-QHPs in the fully insured, commercial Individual and Small Group market.

Considerations for future action were discussed to prepare the Council with a better understanding of what additional standards might be added for Plan Year 2026 and beyond. The Council maintains the stance that data collection and standards should not impose burdens that might compromise the adequacy of current networks. The following considerations were put forth:
1) Examine whether telehealth/virtual visits can be used to meet network adequacy requirements.
2) Review and consider other metrics for the determination of network adequacy. e.g., appointments wait times, provider enrollee ratios, etc.

Access to Healthcare

Given the vast geographic area of the State and the disproportional distribution of its population, Nevada faces many challenges related to access and availability of affordable health coverage. Of the 3 million plus people in the State, approximately 90% reside in two counties, which make up less than 15% of the State's geographic area. Because of this unique distribution, ensuring access to and availability of affordable health coverage for Nevada's population is a challenge.

The State Flexibility to Stabilize the Market Cycle II Grant Program (Grant), awarded by the Centers for Medicare & Medicaid Services (CMS), was utilized to enhance Nevada's role in implementing federal market reforms and consumer protections under Part A of Title XXVII of the Public Health Service Act (PHS Act). With this funding, the Division undertook three key activities to address challenges in accessing healthcare and improve market stability.

First, the Division conducted a market scan in February of 2024 to identify barriers preventing Nevadans from obtaining health insurance, producing a detailed report with valuable insights. Second, the Division assessed Nevada's Essential Health Benefit (EHB) benchmark plan to evaluate its effectiveness and explore potential expansions for commercially insured consumers. Third, the Division analyzed mental health coverages in the state, developing processes and templates to ensure carrier compliance with the Mental Health Parity and Addiction Equity Act (MHPAEA).

In early 2024, a data call to carriers revealed widespread MHPAEA non-compliance, leading to a second request for operational data and claims. Analysis by the Division's contractor uncovered significant violations in Non-Quantitative Treatment Limitations (NQTLs), utilization management, network adequacy, credentialing, and reimbursement practices. In response, the Division initiated targeted examinations of all nineteen carriers, ensuring alignment with federal and state statutes while preparing carriers for forthcoming CMS and state compliance expectations under the new MHPAEA rule.

Collaboration with contractors such as Lewis & Ellis and Regulatory Insurance Advisors provided expertise in data analysis and established a sustainable model for ongoing MHPAEA compliance, equipping Division staff to continue this work independently.

Although grant operations concluded on September 14, 2024, the Division is well-positioned to sustain these efforts. Following CMS' New Rule issued on September 9, 2024, the Division has updated its processes to meet enhanced compliance requirements. Starting January 1, 2025, for group plans, and January 1, 2026, for individual plans, carriers must provide comparative analyses of MHPAEA compliance within ten days of a request. The Division's efforts addressed immediate compliance issues and positioned Nevada as a leader in safeguarding consumer rights and fostering a stable, equitable insurance market.

Long-Term Care Insurance

The long-term care insurance market continues to exhibit volatility. Long-term care insurance premium rates are based on the insured's age, gender, and marital and health statuses. Applicants are underwritten, and those with health issues may be denied coverage. Nationwide, many long-term care insurance policies were initially underpriced because of inaccurate assumptions when the plans were created. As a result, over the last several years, consumers have been subjected to large premium increases. Under the rate stabilization standards enacted by the Division on October 1, 2011, any future rate increase must return at least 85% of the increased premium to the consumer in the form of benefits. Previous and current rate increases for long-term care insurance were and are primarily driven by medical costs for services and medical inflation trends. The volatility of the long-term care line and related rate increases are not specific to Nevada, and how to address this line of business is of great interest to state regulators nationwide.

Medicare Supplement Insurance

The Division annually publishes a Medicare Supplement Insurance Premium Comparison Guide, which contains valuable information about Medicare Supplement policies and rates for different plans. These rates can also be located through a rate "lookup tool". The rates displayed on the Division's website are sample rates and are intended to provide a sample of what a Medicare Supplement Insurance policy might cost. While the Division takes steps to provide the public with the most accurate rates for specific circumstances, the premium rate each company charges an individual is based on several different factors, including a person's age, location, benefit plan selected, and underwriting status.

Nevada's **Property & Casualty** Insurance Market

In 2023, insurers in Nevada wrote $8,561,822,013 in premiums for all property and casualty lines combined. The share of Nevada premiums comprised of property and casualty insurance has increased in recent years from approximately 32.1% in 2021 to approximately 38.5% in 2023.[1]

Property and casualty insurance protects against risks involving property (cars, homes, or businesses, as well as numerous kinds of personal property) and casualty, which refers to liability risks (providing protection for a policyholder against claims of others). The table below represents the 5-year history of direct written premium for Nevada's property and casualty major lines..

One of the Division's primary responsibilities is to protect Nevada consumers through reviewing rate and form filings received from the State's admitted property and casualty insurers. Rates for most commercial lines of insurance are deregulated, but the Division reviews rate filings of personal lines of insurance such as automobile, home, umbrella/liability, title, and various other insurance types. The Division also reviews rates for workers' compensation and medical professional liability (medical malpractice) insurance. Rate reviews ensure that rates are adequate, not excessive, and not unfairly discriminatory.

Nevada is a "prior approval" state for personal lines, a term indicating that, prior to marketplace use, insurers' rates and forms must be submitted to the Commissioner. The "prior approval" framework is a critical consumer protection that ensures insurance products are introduced in the Nevada marketplace only after rates (for personal lines of insurance) and forms (for nearly all lines of insurance) have been thoroughly reviewed to ensure compliance with Nevada law.

Nevada Property and Casualty Direct Premiums Written					
Year	**2019**	**2020**	**2021**	**2022**	**2023**
Automobile	$3,344,145,000	$3,263,425,000	$3,558,689,000	$3,828,841,000	$4,199,334,000
Home	$663,329,000	$710,140,000	$770,673,000	$844,360,000	$928,923,000
Workers' Comp.	$424,846,000	$409,259,000	$417,481,000	$461,468,000	$482,930,000
Surplus Lines	$413,485,000	$440,302,000	$553,658,000	$785,320,000	$970,650,000
Source: NAIC Lines of Business Reports for Property/Casualty Groups and Companies; Nevada Surplus Lines Association (NSLA) RAPID Monthly Comparison Reports					

[1] NAIC I-Site+ 2023 Aggregate Report – Lines of Business by State

The exhibit below also shows significant growth in written premiums for automobile, home, and workers' compensation insurance between 2015 and 2023.

Nevada Property and Casualty Direct Premiums Written Growth									
Year	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**
Automobile	6.20%	9.50%	11.30%	14.70%	9.50%	-2.40%	9.00%	7.60%	9.70%
Home	5.90%	4.40%	3.90%	6.90%	6.90%	7.10%	8.50%	9.60%	10.00%
Workers' Comp.	5.80%	2.00%	-2.20%	12.60%	3.90%	-3.70%	2.00%	10.50%	4.70%
Source: NAIC Lines of Business Reports for Property/Casualty Groups and Companies									

Automobile Insurance

Nevada's automobile insurance direct written premiums have grown substantially since 2021. While the COVID-19 pandemic led to a major, sudden decrease in driving, this decrease was temporary. After stay-at-home orders were lifted and miles driven rebounded and eventually exceeded pre-pandemic levels, most Nevada automobile insurers experienced increasing frequency (number of accidents) and severity (payments made per claim) of losses/claims.

Beginning in late 2021 and continuing through 2024, many insurers filed for significant rate increases motivated by numerous adverse cost pressures. Increases in the cost of medical care have also contributed to claims severity for bodily injury liability and uninsured/underinsured motorists coverages.

Accident severity has become higher due to the greatly increased costs of repairing advanced components in newer vehicles. Technology that includes various smart sensors, collision avoidance, lane-departure warning, automatic emergency braking, and other semi-autonomous vehicle systems can improve the safety of the vehicle's occupants and help to avoid certain accidents. If accidents do occur, repair costs for previously inexpensive components can be thousands of dollars higher because of these new features.

During the past several years, various episodic supply-chain disruptions have led to shortages of key parts for the repairs of vehicles. Used vehicles have also become scarcer and less affordable. New cars have historically been much more expensive than used vehicles, and they continue to become more expensive over time. However, the prices of used vehicles have skyrocketed during the past three years, and thus it has become more expensive to replace a total-loss used vehicle with a vehicle of like kind and quality.

The pandemic has disrupted the labor market as well, leading to severe labor shortages that have affected both auto body shops and insurers' claim departments. Thus, it takes longer for vehicles to be repaired, and it takes longer for claims to be adjusted. During these prolonged waiting times, automobile insurers often need to pay for temporary rental vehicles, if the consumer has purchased Rental Reimbursement coverage.

Vehicle thefts have also been on the rise, and the recent spate of thefts of certain models of Kia and Hyundai vehicles is a prominent example of crime trends that greatly drive up the cost of Comprehensive coverage for automobiles. Data submitted to the Nevada Division of Insurance by multiple insurers suggest a continued severely elevated risk of theft for some models of Kia and Hyundai vehicles – in particular, many models from 2011-2021 which lack an immobilizer that prevents the engine from starting without the correct key. Kia and Hyundai have both offered free updates to the software of affected vehicles that extend the length of the vehicle alarm and require the key to be in the vehicle ignition to start the vehicle. While these updates appear to be effective in thwarting thieves, not all owners of affected vehicles have obtained the updates thus far.

While it is difficult to determine exactly what proportion of automobile insurance claims are the result of fraud or are inflated due to misrepresentation, automobile insurance fraud remains a notable problem that continues to inflict higher costs on insurers, particularly in the Las Vegas area.

Despite inflation in the broader economy moderating in late 2023 and 2024, automobile insurance cost trends tend to lag behind general inflationary trends, since insurers often use multiple years of data to develop their rate indications, and thus a highly inflationary year remains in the data set for several years to come. The Nevada Division of Insurance continues to communicate closely with numerous insurers to obtain the most recent data from them and monitor developments within the market as they occur. Through its rigorous prior-approval system of rate review, the Division ensures that any rate increases that insurers propose are justified with abundant supporting data and that consumers are charged premiums that are not excessive and are based on the true costs of the coverages that they are purchasing.

On November 1, 2023, the Nevada Division of Insurance held a Public Forum on Auto Insurance Rates in Nevada, which provided essential information to consumers about the various influences on automobile insurance costs and the Division's rate-review process and prior-approval system of rate regulation.[2] Subsequent to the Public Forum, the Division released a page of Auto Insurance FAQs, motivated by consumer questions.[3]

Analysis of the NAIC's data on market concentration shows that Nevada retains an objectively competitive automobile insurance market with a lack of market concentration by its carriers. This is true for both individual companies and company groups. However, Nevada auto insurance average premiums continue to rank higher than the nationwide average. The relatively higher cost, compared to some other jurisdictions, appears to be the result of a higher incidence of theft, higher frequency of accidents, and higher severity of injuries sustained in accidents.

A summary of Nevada's private passenger automobile insurance marketplace is provided in Exhibit III, which shows direct premium written in calendar-year 2023, direct premium earned, and direct losses incurred for the largest 25 insurers by volume of direct premium written, along with these insurers' respective 2011 rankings. Exhibit IV shows the largest five insurance groups offering private passenger automobile insurance in Nevada in 2021 and 2023. Exhibit IV also shows the pure direct loss ratio for the largest five groups in 2023 was 92.94% – 4.98 percentage points higher than the ratio for all companies and 22.83 percentage points above the 2021 loss ratio of 69.81% for the largest five groups. The overall loss ratio for Nevada's private passenger

[2] A recording of the webinar for the Public Forum on Auto Insurance Rates can be viewed here: doi.nv.gov/uploadedFiles/doinvgov/Content/Public_Forum_on_Auto_Insurance_Rates_in_Nevada_20231101_1836_1.mp4
[3] The Auto Insurance FAQs can be viewed here: https://doi.nv.gov/Consumers/Automobile_Insurance/Auto_Insurance_FAQs/

automobile insurance market increased from 68.10% in 2021 to 87.96% in 2023, illustrating the extent of the major upward cost pressures that insurers have experienced, even despite significant rate increases that have been approved for most insurers during this period.

The identities of the largest four groups did not change from 2021, but the relative rankings of the largest three groups shifted. State Farm Group has returned to its historical largest market share in 2023, while the market share of the Berkshire Hathaway Group (consisting of the GEICO companies) declined to the second largest (from 18.02% in 2021 to 17.10% in 2023). The market-share ranking of the Progressive Group declined to the third largest, even though its percentage market share increased from 15.13% in 2021 to 16.04% in 2023. Allstate Insurance Group maintained the fourth-largest market share between 2021 and 2023. The United Services Automobile Association (USAA) Group attained the fifth-largest share in 2023, while the Farmers Insurance Group's market share declined to sixth largest.

Exhibit V summarizes major rate changes by the largest five insurance groups in 2023 and 2024. Overall, rate increases have been significant during this period – driven by the confluence of adverse factors described above.

> “Automobile insurance **fraud** remains a notable **problem that continues to inflict** higher costs on insurers, particularly **in the Las Vegas** area.

Usage-Based Automobile Insurance

Various automobile insurers continue to innovate in their usage-based insurance (UBI) programs, which consider the amount of an insured's driving and/or specific driving behaviors to set or adjust premiums paid. Examples of attributes that may be considered by a UBI model include miles driven, the time of day a person usually drives, braking and acceleration, speeding, the type of roads a person drives on, distracted driving like active cell-phone usage, turning behaviors, and whether one is driving in an urban, suburban, or rural location. Individual insurers proposing to use predictive models must file them with the Division. While UBI remains optional for traditional automobile insurers, many insurers have implemented surcharges for riskier-than-average driving behavior. Some insurers charge premiums per mile driven rather than per period (the "pay-per-mile" concept).

There are several potential advantages of UBI programs. Well-designed consumer-facing UBI apps could reduce the underlying frequency and severity of losses. Further, premiums could automatically adjust during periods of reduced driving – for instance, during a pandemic when more people stay at home. Moreover, people who do not drive their vehicles for extended periods of time because of travel, military deployment, illness, or other life circumstances could maintain required liability insurance while paying significantly lower premiums.

However, to increase the take-up of UBI products, it is expected that insurers will need to address privacy concerns, including whether insurers will sell consumer driving data to third parties, whether consumers will be tracked based on location, and whether consumers will be tracked via their phones when they are not driving. On March 11, 2024, The New York Times published an article addressing concerns that manufacturers of "connected" vehicles may be sharing consumers' information regarding the operation of those vehicles with insurers, without the consumers' consent.[4] The Nevada Division of Insurance has sought in its rate-review process to ensure that such data collection without consent does not occur in Nevada. Accordingly, the Division has asked various insurers questions in this area and has communicated that the prior affirmative consent of the consumer for the specific uses of driving-related information in insurance rating is required and should be documented. Furthermore, information may not be used for rating purposes if it was collected by the vehicle manufacturer or third-party vendor prior to or in the absence of the insurer's disclosure to the consumer of that information as being usable in insurance rating. So far, it appears that no insurer has proposed to use such data from "connected" vehicles in Nevada, nor has any insurer disclosed the use of such data in response to the communications from the Division. However, the Division remains vigilant in ensuring that these non-consensual uses of driving data from "connected" vehicles do not arise in Nevada.

Home Insurance

The home insurance market in Nevada has been challenged in 2023 and 2024 by rising insurance premiums and some tendencies by certain insurers to restrict availability of coverage in some areas of Nevada considered to be more prone to wildfire losses.

In recent years, parts of the country have experienced terrible wildfire damage. Notable California wildfires include the Dixie, Monument, and Caldor Fires of 2021, as well as the Park and Borel Fires of 2024, which caused extensive damage to homes and businesses. Nevada has been fortunate because the fires and fire damage in the state have not been as extreme as in other states. In 2021, an unprecedented year of wildfire experience in California, Nevada suffered a loss of 12 homes from the Tamarack Fire, which originated in California. Thereafter, Nevada experienced a fortunate three-year period of almost no damaging wildfires – until the Davis Fire of September 7-25, 2024, which destroyed at least 11 homes and 3 other structures in Washoe Valley. The Nevada Division, through its analysis of historical wildfire losses in Nevada, estimates that approximately 168 homes were destroyed by wildfires in Nevada during the most recent 31 years, from 1994 to 2024 – or approximately 5.42 home total losses due to wildfires per year. If one considers partial losses to other homes, as well as losses to outbuildings and other structures, one could roughly double the above estimate to 10.8 to 11 home "total-loss equivalents" due to wildfires per year, though with considerable variability from one year to the next.

One requirement of the Division's rate-review approach is that Nevada home insurance rates must consider Nevada experience data. Nevada's overall home insurance rates have been impacted by the large fire losses experienced in other states because of having similar risk profiles, including factors such as slope and fuel availability.

The use of complex mathematical models, or "predictive models," in the home insurance industry has steadily increased. These models have been introduced in rating plans over the past two decades. Recently, the Division has identified an increase in the number of independent third-party organizations that sell catastrophe models addressing specific perils for use in insurance rating. Some of these models have been developed to provide insurers with ways to evaluate

[4] Kashmir Hill. "Automakers Are Sharing Consumers' Driving Behavior With Insurance Companies". The New York Times. March 11, 2024. https://www.nytimes.com/2024/03/11/technology/carmakers-driver-tracking-insurance.html

risk exposures associated with infrequent, but severe, weather loss events or catastrophic loss events such as earthquakes, fires, and floods.

The Division approved multiple such models after rigorous reviews for use as supplemental rate information, subject to conditions upon the models' use. Insurers are prohibited from using model outputs as the sole reason to deny the issuing an insurance policy or to cancel or non-renew an insurance policy in Nevada. In response to NRS 679B.129, enacted by the Nevada Legislature in 2021, the Nevada Division of Insurance developed the Nevada Personal-Lines Property Insurance Wildfire Mitigation Incentive Program – a program of voluntary incentives that property insurers in Nevada may adopt, subject to an expedited prior-approval process, in order to promote and encourage property owners to take measures to mitigate the risk of property loss or damage caused by wildfire.[5]

The Division conducted two data calls in 2023 and 2024, requesting all Nevada home insurers to provide information regarding their policies, applications, underwriting criteria, and declinations, cancellations, and nonrenewals pertaining to wildfire risk. In 2022, largely before the wildfire issue became a prominent consideration for many insurers, there were 115,477 home insurance policies canceled or nonrenewed in Nevada altogether, and 264 of them were canceled or nonrenewed due to wildfire risk. In 2023, the total number home insurance policies canceled or nonrenewed in Nevada increased to 157,953, while the number canceled or nonrenewed due to wildfire risk increased to 481. In 2022, a total of 2,439 applications for home insurance were declined by insurers due to wildfire risk, while in 2023, the number of applications declined due to wildfire risk increased to 4,994. However, the Division expects these numbers and percentages of insurer adverse actions related to wildfire risk to increase beyond 2024. Moreover, in certain areas of Nevada, these adverse actions by insurers are significantly more concentrated, and the Division's analysis also identified forty ZIP Codes where the declinations, cancellations, and nonrenewals were much more frequent than the statewide average. This analysis indicates that there is a heavy concentration of policy non-renewals, cancellations, and application denials due to wildfire risk in the Washoe County, Carson City, and Douglas County areas. Homes near Lake Tahoe and along the eastern Sierra Nevada Mountains are particularly affected.

Homes Destroyed by Wildfire
over 31 year analysis

168 total
5.42 / year
1994 - 2024

Total-Loss Equivalents
(including partial loss and out buildings)

10.8 - 11 / year

A summary of Nevada's home insurance marketplace provided in Exhibit VI shows the 2023 direct premium written, direct premium earned, and direct losses incurred for the largest 25 insurers in Nevada, along with these insurers' respective 2021 rankings. Exhibit VII shows the largest five insurance groups offering home insurance in Nevada between 2021 and 2023. The largest five insurance groups constituted 57.43 percent of Nevada direct written premium in 2023, compared to 58.13 percent in 2021. Re-

[5] The Nevada Personal-Lines Property Insurance Wildfire Mitigation Incentive Program can be found at https://doi.nv.gov/uploadedFiles/doi.nv.gov/Content/Insurers/Property_and_Casualty/Wildfire_Mitigation_Incentive_Program.pdf.

garding market shares of individual companies, a slight increase in market share was observed for the largest 25 insurers, which wrote 79.07 percent of the premium in 2023 compared to 78.19 percent in 2017. Despite concerns about home insurance availability and affordability in the more wildfire-prone areas of Nevada, an overall analysis of home insurance market concentration for both individual companies and company groups, based on NAIC data, shows that Nevada's home insurance market has been and remains competitive and relatively un-concentrated.

Exhibit VIII summarizes major rate changes observed by the top five insurance groups within the past three years. Most of the changes in 2023 and 2024 have been rate increases, a trend that is indicative of more adverse loss experience. Many insurers in Nevada have attributed the increases to rises in the frequency and severity of non-weather water damage claims, as well as significant increases in the cost of construction materials and labor and rising costs of reinsurance.

Medical Professional Liability (Medical Malpractice) Insurance

Medical professional liability insurance provides defense and indemnification for claims arising out of alleged errors and omissions, or failure to meet the standard of care, in the practice of medicine. It is more commonly known as medical malpractice insurance. With few exceptions, in Nevada, medical professional liability insurance is not mandated by law. However, physicians and certain other medical professionals are typically required to show proof of coverage to receive hospital privileges or to be included in preferred-provider networks. Because many medical professionals would be unable to practice medicine without medical professional liability insurance, and because the public's well-being depends on access to medical care, it is considered an essential insurance product.

Exhibit IX represents Nevada's medical professional liability experience reported on insurers' Annual Statements, which are filed with the NAIC, for calendar year 2023. The exhibit shows that medical professional liability insurance has been a profitable line of business during the period in question. From 2009-2023, in Nevada, overall insurer losses for this line of business have ranged from low to moderate. During most years, less than half of premiums earned by medical professional liability insurers were used to pay claims. In 2023, the loss ratio (ratio of losses incurred to premiums earned) for the largest 25 medical professional liability insurance companies was 60.30% (compared to 43.08% in 2021), while the loss ratio for the medical professional liability insurance market overall was 55.69% (compared to 53.62% in 2021).

The number of companies offering medical professional liability insurance in Nevada generally has increased over time. In considering data from 2009-2021, 69 insurers wrote medical professional liability insurance in Nevada in 2009, which grew to 97 carriers in 2017. After a period of slight retraction of carriers offering medical malpractice coverage in Nevada, because of both a consolidation of some medical malpractice insurers and some risk-retention groups exiting the market, the State reached a historical high number of 98 carriers offering coverage in 2023.

In all, the number of active medical malpractice insurers in Nevada appears to have stabilized at a substantially higher level than approximately 15 years ago. Medical professional liability insurers continue to make new product offerings, and the Division regularly reviews new programs developed by existing insurers to address liability risks of medical specialties.

> Overall analysis of **home insurance** market concentration shows that **Nevada's home insurance market** has been and **remains competitive** and relatively **un-concentrated.**

Risk-Retention Groups in Medical Malpractice Insurance

Overall, the medical professional liability insurance market in Nevada continues to be extremely stable and competitive. However, since the middle of the last decade, the Division has observed significant differences between the traditional medical professional liability insurer experience and that of risk-retention groups (RRGs).

Largest 5 insurance groups percent of direct written premiums

58.13%	2021
57.43%	2023

RRGs are a form of self-insurance authorized by the federal Liability Risk Retention Act of 1986 (LRRA). Risk-retention groups may be formed by a group of insureds, each of whom is engaged in a similar or related business, to insure the liability risk exposures of that group. Once an RRG is licensed in its state of domicile, it may operate in any other state, subject to registration requirements and compliance with each state's laws regarding premium taxation, unfair trade practices, and other generally applicable insurance matters.

RRGs are particularly significant providers of medical professional liability insurance in Nevada. In each of the calendar years 2023 and 2021, 6 of the largest 25 medical professional liability insurers by market share were RRGs, compared to 3 in 2019. The 6 RRGs shown in Exhibit IX are domiciled in other states and, pursuant to LRRA, eligible to write business in Nevada.

Nevada-domiciled RRGs are licensed as captive insurers pursuant to NRS Chapter 694C. The numbers of active Nevada-domiciled RRGs have plummeted since 2015 because of problems with RRG structure and its unique vulnerabilities to adverse impacts in the medical malpractice arena.

At year-end 2023, 21 RRGs domiciled in other states comprised 17.2% of the medical malpractice insurance market written premium. These RRGs have tended to enjoy stronger financial positions than RRGs domiciled in Nevada; however, within the past 7 years, several RRGs domiciled elsewhere have also become insolvent or have voluntarily discontinued operations. Reasons for these developments vary by insurer, but generally include the following: fewer assets and lower premium volume compared to traditional insurers; higher expense ratios; negotiating disadvantage when procuring reinsurance to limit exposure on a given claim or set of policies; and the fact that most medical malpractice RRGs are monoline insurers, meaning that they write only medical professional liability business. Writing only medical professional liability business leaves those RRGs vulnerable to systemic adverse events that could affect that line of business in a particular jurisdiction.

Between 2014 and 2024, the Division has actively taken steps to resolve the issues faced by troubled Nevada-domiciled medical professional liability RRGs. As of October 2024, only two active Nevada-domiciled medical malpractice RRGs remain. Both RRGs write relatively low volumes of business and are tailored to the insurance needs of specialized populations of medical professionals. Only one of these RRGs writes a minimal amount of business in Nevada.

Despite the challenges faced by some RRGs, the overall market for medical professional liability insurance remains favorable in Nevada – with healthy and growing competition, available and affordable coverages, and most insurers' undiminished capacity to pay claims.

RRG's of the largest 25 medical professional liability insurers by market share

3 2019

6 2023

"As of **October 24** **only two** active Nevada-domiciled **medical malpractice RRG's** remain.

Workers' Compensation Insurance – Private Insurers

Effective July 1, 1999, Nevada moved from a state-run industrial insurance program to a system of workers' compensation insurance provided by private insurers, SIGs, and SIEs. This new system has created a competitive and stable workers' compensation insurance market in Nevada. While the Division regulates both private insurers and self-insured arrangements, this segment focuses on private insurers.

The 2022 Oregon Premium Rate Ranking Study, produced by Oregon's Department of Consumer and Business Services, identified Nevada as having the 15th-lowest average cost of workers' compensation insurance out of 51 U.S. jurisdictions.[6] In 2020, Nevada had the 10th-lowest average-cost ranking, and in 2018, Nevada had the 8th-lowest average cost ranking.

Since July 1, 2001, the National Council on Compensation Insurance (NCCI) has filed proposed loss costs for Nevada's private insurance market. Once these loss costs are filed, insurers may file loss-cost multipliers to consider the impact of other insurer-specific expenses and profit (considering investment income). NCCI also files assigned-risk plan proposed rates for Nevada businesses that must find a carrier who will write their risk in the private insurance market.

Overall, Nevada workers' compensation insurance rates have declined in recent years, which reflects the declining costs of insured losses. NCCI received approval for an average decrease of 1.8% in voluntary-market loss costs and a 2.9% decrease in assigned-risk rates, effective March 1, 2024. This follows the March 1, 2023, average reductions of 5.2% and 3.6%, respectively, from the voluntary-market loss costs and assigned-risk market rates. The workers' compensation experience analyzed by NCCI has remained favorable. Based on recent historical data and the application of its actuarial methodology, despite modest annual growth in required benefits provided by workers' compensation coverage, NCCI determined that favorable experience for both indemnity and medical losses would justify lower loss costs. The low and declining overall loss ratios generally suggest that current workers' compensation rates are highly adequate and conducive to continued insurer solvency.

Total Nevada Workers' Compensation Premiums

$417,481,286 2021

$461,468,000 2022

$482,930,000 2023

Workers' compensation insurers did experience modest revenue decreases during the early COVID-19 pandemic, beginning in March 2020. These decreases were primarily driven by the spike in unemployment resulting from layoffs as many service-oriented businesses were temporarily closed to enforce physical distancing. Workers' compensation insurance uses payroll as the exposure base, and so reductions in payroll will necessarily translate into reductions in premium collected by insurers. Because of corresponding decreases in risk exposure as many workers stayed home and those who continued to work were often shifted to lower-hazard tasks and environments, these changes did not adversely affect the profitability of workers' compensation insurers. Furthermore, as employment has rebounded, so have workers' compensation premiums. In 2021, total Nevada workers' compensation premiums increased by approximately 2.00% from 2020 levels and were at their highest amount ($417,481,286) for every year except 2019, during which the total workers' compensation premiums in Nevada were $425,385,000. In 2022, total Nevada workers' compensation premiums reached $461,468,000, exceeding 2019 levels. In 2023, Nevada workers' compensation premiums reached what is, as of this writing, a historic high amount of $482,930,000. This premium volume was reached even though NCCI filed and received approval for loss-cost decreases (which translate into rate decreases) during every one of the recent four years. Thus, increasing workers' compensation premiums are a result of increasing employment and business activity and were not brought about by rate increases.

Because telecommuting occupations are generally safer from the standpoint of risk of injury and occupational disease, it is anticipated that any sustained shift in working patterns in the aftermath of the pandemic will have a favorable impact on workers' compensation loss experience and thus on insurer profitability. It also appears that, thus far, most workers' compensation payments in connection with COVID-19 cases have been for short durations of time, compensating employees for time during which they needed to self-isolate and/or await test results. The impacts of COVID-19 on the medical costs of the Nevada workers' compensation system have been minor as of this writing, and it appears that NCCI and individual insurers are simply reflecting these impacts in their regular experience data going forward, with the understanding that such impacts will not pose any extraordinary strain.

[6] Oregon Workers' Compensation Premium Rate Ranking, Calendar Year 2022. October 2022. https://www.oregon.gov/DCBS/DCBSPubs/reports/general/prem-rpt/22-2083.pdf

Title Insurance

Title insurance is a contract in which the title insurance company, in exchange for a one-time premium at close of escrow, protects against future losses resulting from defects in the title to real property that exist at the time of purchase but are unknown or undisclosed. Rather than providing protection for unknown future events, title insurance provides protection from future losses because of events that have already occurred (such as a mechanic's lien or a forgery in the chain of title). If there is a claim on the title due to a defect in the title that existed at the time of policy issuance, the title insurer will defend the property owner in court and if necessary, pay the damages incurred. Before issuing the policy, title insurers eliminate risks and prevent losses in advance through extensive searches of public records and thorough examination of the title. Because of this, the majority of title insurance premium is used for expenses rather than losses, and loss ratios are usually very low.

When a home is purchased, buyers will typically purchase an owner's policy of title insurance in the amount of the purchase price of the home to protect their interest in the home for as long they own the home. At the same time, if there is a mortgage, the lender will require the buyer to purchase a lender's policy of title insurance in the amount of the loan to protect the lender's interest until the loan is paid off. Traditionally in Nevada, the seller pays for the owner's policy and the buyer pays for the lender's policy, but this may be negotiated.

Since the Insurance Market Report to the 2023 Legislature, more carriers have entered the title insurance market, but the proportion held by the major title insurance companies has been mainly unchanged. In 2021, three insurance groups comprising six companies held 74 percent of the market share with 13 companies making up the rest. In 2023, the same three groups held 75 percent of the market share with 19 companies making up the rest.

Nevada title insurance revenue in the form of earned premium decreased in the last two years after six years of increases. Earned premium decreased from an all-time high of approximately \$320 million in 2021 to \$258 million in 2022 and \$176 million in 2023. This is comparable to 2016 premiums. Historically, loss ratios for title insurance have been very low – often less than 10 percent – as the majority of title premium is used for expenses such as searching and correcting any defects in the title before the policy is issued rather than paying losses after the fact. Loss ratios in 2022 and 2023 were three percent and five percent, respectively.

Typically, a homebuyer will use a title agent recommended by the real estate agent or lender, but such recommendations may be in the real estate agent's or lender's best interest instead of the consumers. The Division recommends that consumers shop around for the agent that is right for them. Nevada law prohibits requiring the use of a particular agent or insurer as a condition of the sale or loan. The buyer always has a choice.

To help buyers in navigating their options, the Division's website includes a title and escrow consumer education section. It contains a brief explanation of how title insurance works, the Division's Consumer's Guide to Title Insurance,[7] instructions for sending in a complaint or filing it online,[8] and the Title Insurance Rate Comparison tool.[9] This tool allows consumers to enter information about a property (purchase price, down payment, county, and whether it is a short sale) and receive a list of title agencies operating in the county, the title insurers they write for, and the costs of an owner's policy of title insurance, a simultaneously issued lender's policy of title insurance, and the escrow/closing fees. The tool has a similar comparison for refinance transactions.

[7] Nevada Consumer's Guide to Title Insurance – http://doi.nv.gov/uploadedFiles/doinvgov/_public-documents/News-Notes/Title-Guide.pdf

[8] File a Complaint – http://doi.nv.gov/Consumers/File-A-Complaint/

"The Division's website includes a **title and escrow consumer section.** It contains the **Title Insurance Rate Comparison Tool** and the Division's **Consumer's Guide to Title Insurance.**

[9] Search for Title Insurance Rates – http://titlerates.doi.nv.gov

Nevada Division of **Insurance** Sections

Administrative

The Administrative section provides essential support to the Commissioner on all insurance-related matters and ancillary support to all other sections, including fiscal planning, I.T., and human resources. This includes managing personnel tasks, regulatory interpretation, and coordinating travel, meetings, and handling general communications. Located primarily in Carson City the Administrative section plays a key role in facilitating smooth operations across all sections of the Division.

Captive Insurance

Captive insurance is a regulated form of alternative risk financing by which an insurance carrier is formed to insure the risks of its owners. By carrying their own insurance, companies can reduce costs, insure risks that are difficult to find coverage for on the commercial market, have direct access to reinsurance markets, and benefit from the captive insurer's underwriting profits.

The lines of business written by Nevada Captives include industries of banking, finance, agriculture, mining, construction, manufacturing, sales and services, and healthcare-related fields. New companies with innovative ways to utilize Captive insurance continue to emerge in Nevada, including companies seeking to provide alternative solutions to the availability challenges surrounding wildfire coverage.

Regulators at the Nevada Division of Insurance continue to work with Captive Insurers and their service providers to keep our state as an attractive domicile for captive insurance. Nevada currently ranks 10th in the nation as a domicile for captive insurers.

Consumer Services

The Division's Consumer Services section protects Nevada consumers in their interactions with the insurance industry. The Division assists consumers by ensuring that carriers and producers act within the law, and Division staff routinely tracks claims settled, premium refunds, compromised settlement resolutions, and company positions overturned because of consumer complaints filed with the Consumer Services section.

Recoveries are tracked and reflect the amount of monetary relief for Nevada consumers. For Fiscal Year 2024, the section responded to approximately 12,000 consumer inquiries and investigated 3,849 consumer complaints regarding the activities of insurance companies, insurance agents, bail agents, title agents, service contract providers, and other regulated entities. Through its efforts, the section recovered $8,303,537.27 for Nevada consumers during this period.

The Nevada Division of Insurance, through its Consumer Services section, continues to protect Nevada consumers by addressing complaints and ensuring compliance with state insurance regulations. The Division tracks consumer inquiries, complaints, and monetary recoveries, which reflect the financial relief provided to consumers. In Fiscal Year 2024, the Consumer Services section recovered significant funds for Nevada consumers across its offices in Las Vegas and Carson City. The table below outlines monthly recoveries for each office and the total for the fiscal year.

Consumer Services

Fiscal Year 2024

Inquiries Responded to **12000**

Investigated Complaints **3,849**

Recovered for Consumers **$8.3** million

Office	July	August	September	October	November	December
Las Vegas	$241,467.20	$220,702.00	$108,446.00	$163,062.61	$287,885.00	$340,285.00
Carson City	$429,127.00	$469,708.00	$568,147.00	$156,914.00	$564,515.00	$121,089.00
Report Total	$670,594.20	$690,410.00	$676,593.00	$319,976.61	$852,400.00	$461,374.00
January	**February**	**March**	**April**	**May**	**June**	**Total**
$265,776.00	$390,319.00	$465,761.00	$214,960.00	$288,062.00	$1,001,944.00	$3,989,181.81
$503,699.00	$811,000.00	$150,111.00	$230,579.00	$32,930.46	$274,076.00	$4,311,895.46
$769,475.00	$1,201,319.00	$615,872.00	$445,539.00	$321,504.46	$1,276,020.00	$8,301,077.27

Corporate and Financial Affairs

The Commissioner is responsible for ensuring that insurance companies and other regulated entities doing business in Nevada are financially solvent. The Division's Corporate and Financial Affairs section ("C&F") oversees insurer solvency through financial reporting and monitoring, desk audits, and examinations.

Under Nevada law, each insurer so licensed must be examined for financial solvency (financial examination) no less than once every 5 years. Financial analysis of these entities is ongoing and performed through regularly scheduled, statutorily required filings, as well as through filings made on an as needed basis.

In addition to traditional insurers, C&F also provides financial oversight to other regulated entities. These entities include approximately 91 captives and 160 cells, 87 SIEs, and 7 SIGs. Nevada and other US Domiciles have experienced a wave of dissolutions of Captive Insurers due to the uncertainties caused by proposed changes to the Internal Revenue Service Code Section 831(b).

For the 2022 and 2023 calendar years, the Division participated in 15 financial examinations of domestic insurers. During that time, the Division conducted 44 regulatory examinations of "non-traditional" insurers.

Investigations

The Division's Investigations Section investigates potential violations within the insurance industry. The section investigates licensees, both corporate and individuals, based on referrals from other sections within the Division, as well as from outside sources. The section also investigates unlicensed engagement in the business of insurance. Finally, the section performs all background investigations for Captives and the Licensing sections.

For fiscal year 2023 and 2024, the Investigations Section received 90 and 167 referrals, respectively, regarding potential violations in the insurance industry. In 2023, 93% of referrals resulted in 84 investigations. In 2024, 95% of those referrals resulted in 158 opened investigations and were assigned to an investigator. In 2023, investigation conducted 59 Captive background investigations and 71 Captive investigations in Fiscal Year 2024. Further investigations conducted 214 licensing background investigations in 2023, and 176 in 2024.

Fraud

The Fraud section investigates allegations of insurance fraud in Nevada. The section works with the Attorney General's Insurance Fraud Criminal Unit to coordinate investigations. For Fiscal Year 2022, the section's investigators received 1493 suspected fraud complaints, opened 81 reports for investigation, and referred 19 cases to the Attorney General for prosecution. For Fiscal Year 2023, the section's investigators received 1472 suspected fraud complaints, opened 63 reports for investigation, and referred 15 cases to the Attorney General for prosecution. The investigations during this period resulted in 44 criminal cases filed, 40 convictions, and over $100,000 in restitution ordered.

Legal

The Legal section functions as general counsel to the Commissioner and Division, providing legal support regarding the 63 chapters of statutes and 43 chapters of Insurance Code regulations, which are used to regulate the business of insurance in Nevada. The Legal section pursues administrative actions against persons licensed under the Insurance Code, as well as administrative actions against unlicensed persons improperly engaging in the business of insurance.

Market Regulation

The Market Regulation section is responsible for assessing the insurance marketplace's compliance with Nevada statutes and regulations, taking necessary action if the marketplace is not in compliance, and resolving other concerns with individual companies or the marketplace. In 2022, the Division conducted a first-level analysis of 69 priority companies for data year 2021, with 5 of them raised to level 2, resulting in further action. In 2023, first level analysis of 53 companies for data year 2022, 8 were raised to level 2 with further action. In 2024, the Division has 106 companies on the priority list for data year 2023.

The Division has participated in 6 multi-state coordinated market conduct examinations of insurance companies.

Licensing

The Licensing section is responsible for reviewing and ensuring statutory compliance of 27 different license types. The Licensing section's primary duty includes issuing new and renewal licenses, as well as general license maintenance. The work of the Licensing section directly protects Nevada consumers through activities such as background investigations of potential licensees, participating in pre-license examination development, and assisting in the development of continuing education for licensees.

Since the onset of the COVID-19 pandemic, the Division has experienced a large influx of license applications, growing from 180,962 licensed individuals and agencies on January 22, 2020, to 267,361 active licensees on September 3, 2024, representing an increase of 86,399 licensees. Prior to 2020, the Division received an average of around 35,000 applications per year; since then, the Division has received an average of almost 54,000 license applications per year.

Of the 267,361 total active licensees in Nevada, there are 250,551 individuals and 16,810 agencies. The individual licensee pool consists of 24,176 residents and 226,375 non-residents. Agency licensees consist of 2,147 residents and 14,663 non-resident firms. Roughly 89% of all licensees (237,712 individuals and agencies) hold a producer license.

This section handles the annual appointment renewal invoicing process, which tracks the number of licensed producers appointed by the insurers doing business in this State. This process is done electronically, allowing over 1,000 insurers to submit electronic payments for their annual appointment renewal. In 2024, the annual appointment renewal project generated more than $10.3 million deposited into the General Fund.

Self-Insured Workers' Compensation

The Self-Insured Workers' Compensation (SIWC) section is responsible for regulating employers and groups of employers who choose to self-insure their workers' compensation liabilities, rather than purchasing commercial workers' compensation insurance. The SIWC section ensures these entities meet statutory compliance and have the financial capacity to cover claims. This includes oversight of individual self-insured employers (SIEs) and Associations of Self-Insured Employers (SIGs).

As of 2024, Nevada has 87 active self-insured employers, covering approximately 300,000 employees. These employers include large corporations and public entities such as municipalities, school boards, casinos, trucking companies, and manufacturers. Additionally, there are seven active SIGs representing approximately 2,500 member employers covering approximately 65,000 employees. These groups pool their workers' compensation liabilities, allowing smaller businesses to self-insure collectively.

The SIWC section also regulates insurance administrators. Many Nevada employers and insurers contract with Third-Party Administrators (TPAs). There are approximately 400 TPAs in Nevada, which provide essential services in claims administration by contracting with insurers (including self-insured entities) and employers who outsource these functions. TPAs handle various tasks, including premium collection, underwriting, and the adjudication, settlement, and payment of claims. They work with traditional carriers (for example life, health, and workers' compensation insurers) and self-insured employers and groups, managing workers' compensation, health, and specific employee benefit plans. Some TPAs also act as pharmacy benefit managers, overseeing prescription drug benefits as part of broader health or workers' compensation programs. Insurers and self-insured entities benefit from streamlined processes, specialized expertise, and cost efficiency through outsourcing to TPAs.

Self-Insured Workers' Compensation Market

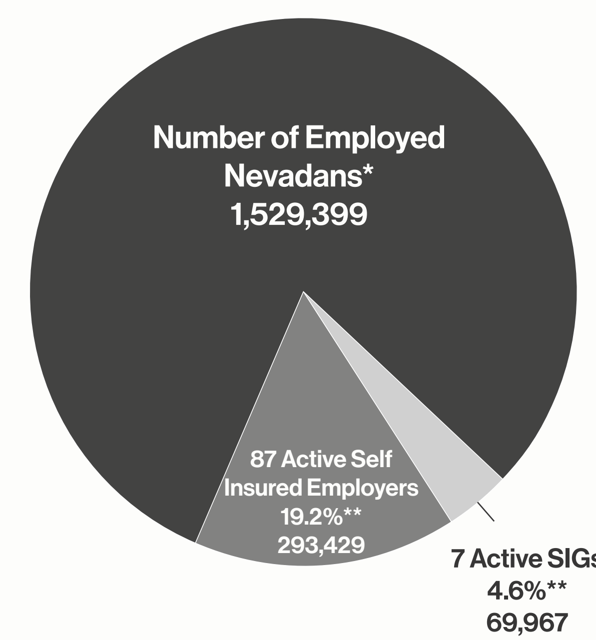
Self-insured workers' compensation has long been an alternative to commercial insurance for Nevada employers seeking to manage their workers' compensation liabilities directly. This option is available to individual self-insured employers (SIEs) and Associations of Self-Insured Employers (SIGs).

Larger employers, such as school boards, municipalities, counties, casinos, trucking companies, large retailers, hospital networks, hotel chains, manufacturers, and construction companies, may apply for a certificate to self-insure workers' compensation claims. These self-insured employers (SIEs) are directly responsible for paying claims. Over time, industry consolidation has reduced the number of self-insured employers, though the number of covered employees has increased. As of 2024, there are 87 active self-insured employers, with an additional 78 SIEs in runoff status, continuing to pay claims but no longer accepting new risks.

Small and medium-sized employers, including private companies and government agencies, may apply for membership in an Association of Self-Insured Employers (SIG). A SIG pools the workers' compensation risks of its members' employees, and each member must execute an indemnity agreement, jointly and severally binding them to cover all liabilities incurred by the SIG. Rather than paying premiums, SIG members pay assessments, which are calculated by each SIG independently of NCCI loss costs or data. As of 2024, Nevada has seven active SIGs and two in runoff.

Workers' compensation claims can extend for the life of the injured employee meaning there is no guarantee that funds will always be available to cover claims. Unlike commercial insurers, self-insured entities are not covered by a guaranty fund. The backstop for self-insured employers and SIGs consists of two separate Insolvency Funds managed by the Division—one dedicated to self-insured employers and the other to SIGs. In the event of insolvency, claims from injured workers would be assumed by and paid from the respective Insolvency Fund, providing critical financial protection for affected injured workers.

Self-Insured Workers' Compensation Coverage in Nevada



* As of 5/7/2024, DETR
** As of 5/8/2024, Division of Insurance

Exhibits Directory

Exhibits

EXHIBIT I -
Nevada Health Insurance Market – Total Members and Written Premiums

Line of Business	End of 2017	End of 2018	End of 2019	End of 2020	End of 2021	End of 2022	End of 2023
Total Members							
Individual Comprehensive	127,903	120,050	108,974	115,084	129,350	123,464	126,456
Group Comprehensive	408,320	388,667	386,858	365,909	370,810	350,369	335,792
Medicare Supplement	11,446	11,827	12,977	13,893	14,869	16,605	16,836
Vision Only	207,051	183,529	188,378	192,269	202,751	225,565	230,672
Dental Only	312,892	808,374	803,548	906,694	1,010,711	1,043,066	1,054,953
Federal Employees Health	38,857	39,029	40,321	41,389	41,497	41,601	42,771
Title XVIII Medicare	175,437	183,513	188,721	206,729	228,309	246,965	269,531
Title XIX Medicaid	475,597	476,416	461,166	572,874	647,994	680,032	661,519
Other	105,899	103,101	110,445	118,862	122,299	125,581	126,834
Totals	**1,863,402**	**2,314,506**	**2,301,388**	**2,533,703**	**2,768,590**	**2,853,248**	**2,865,364**
Written Premiums							
Individual Comprehensive	$548,283,592	$635,330,736	$595,397,983	$563,911,235	$665,943,820	$731,276,702	$654,373,130
Group Comprehensive	$1,740,709,929	$1,769,040,078	$1,761,403,078	$1,766,559,988	$1,841,534,121	$1,892,930,207	$1,873,095,712
Medicare Supplement	$31,735,840	$31,330,685	$32,550,551	$34,369,778	$37,510,893	$40,803,698	$42,650,181
Vision Only	$14,089,885	$13,817,767	$14,215,442	$14,002,537	$15,290,310	$35,655,720	$17,846,005
Dental Only	$92,934,116	$163,312,096	$167,379,751	$163,225,269	$183,157,425	$176,175,749	$200,710,705
Federal Employees Health	$224,328,317	$227,619,971	$257,332,967	$250,368,448	$261,514,256	$262,441,697	$294,476,076
Title XVIII Medicare	$2,007,588,445	$2,212,893,470	$2,518,388,999	$2,880,618,524	$3,239,227,917	$3,701,544,726	$4,423,206,995
Title XIX Medicaid	$1,655,198,362	$1,805,841,239	$1,797,892,562	$1,917,171,741	$2,483,272,755	$2,572,586,280	$2,672,154,021
Other	$67,923,938	$67,498,621	$71,758,209	$61,005,934	$54,614,330	$61,868,029	$69,984,248
Total	**$6,382,792,424**	**$6,926,684,663**	**$7,216,320,229**	**$7,651,233,454**	**$8,782,065,827**	**$9,475,282,808**	**$10,248,197,064**

EXHIBIT II -
Nevada Health Insurance Market – Carriers and Sample Average Monthly Premiums

	Area 1 Clark and Nye	Area 2 Washoe	Area 3 Carson, Lyon, Storey, Douglass	Area 4 Remainder of Rural Counties	Average Approved Statewide Rate Increase
Plan Year 2017					
2nd Lowest Silver *	$282	$333	$379	$473	
Off Exchange Carriers	10	9	8	6	10.75%
On Exchange Carriers	3	4	3	2	
Plan Year 2018					
2nd Lowest Silver *	$340	$455	$597	$599	
Off Exchange Carriers	3	3	2	0	31.6%
On Exchange Carriers	2	2	1	1	
Plan Year 2019					
2nd Lowest Silver *	$369	$480	$642	$643	
Off Exchange Carriers	4	4	3	1	0.31%
On Exchange Carriers	2	2	1	1	
Plan Year 2020					
2nd Lowest Silver *	$338	$440	$549	$662	
Off Exchange Carriers	3	3	2	0	1.6%
On Exchange Carriers	3	3	2	2	
Plan Year 2021					
2nd Lowest Silver *	$364	$443	$529	$635	
Off Exchange Carriers	6	6	4	2	4.42%
On Exchange Carriers	5	4	3	3	
Plan Year 2022					
2nd Lowest Silver *	$351	$442	$563	$564	
Off Exchange Carriers	5	5	4	1	4.40%
On Exchange Carriers	6	6	4	3	
Plan Year 2023					
2nd Lowest Silver *	$358	$422	$591	$532	
Off Exchange Carriers	6	6	5	2	9.00%
On Exchange Carriers	6	6	4	3	

EXHIBIT III -
Private Passenger Automobile Insurance by Premium – Largest 25 Insurers – 2023

2023 Rank	2021 Rank	NAIC Company Code	Company Name	State of Domicile	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	1	25178	State Farm Mutual Automobile Insurance Company	IL	584,497,868	540,956,517	558,741,842	103.29%	16.45%
2	2	16322	Progressive Direct Insurance Company	OH	348,058,972	331,120,218	244,339,259	73.79%	9.79%
3	3	29688	Allstate Fire & Casualty Insurance Company	IL	298,220,110	288,881,209	241,915,163	83.74%	8.39%
4	5	38628	Progressive Northern Insurance Company	WI	221,988,613	214,076,186	166,782,591	77.91%	6.25%
5	4	14138	GEICO Advantage Insurance Company	NE	211,974,888	208,522,886	223,189,420	107.03%	5.97%
6	9	14137	GEICO Secure Insurance Company	NE	203,326,786	190,220,870	179,421,232	94.32%	5.72%
7	6	37770	CSAA General Insurance Company	IN	173,247,334	158,815,324	117,261,586	73.84%	4.88%
8	7	21652	Farmers Insurance Exchange	CA	130,564,078	129,447,944	87,681,223	67.73%	3.67%
9	11	19070	The Standard Fire Insurance Company	CT	85,455,022	79,286,830	66,468,799	83.83%	2.40%
10	8	14139	GEICO Choice Insurance Company	NE	78,205,161	78,656,911	71,229,349	90.56%	2.20%
11	12	25941	United Services Automobile Association	TX	73,161,614	70,201,457	58,927,690	83.94%	2.06%
12	10	41491	GEICO Casualty Company	NE	64,594,517	64,205,397	80,059,563	124.69%	1.82%
13	14	18600	USAA General Indemnity Company	TX	63,362,266	59,866,269	54,039,112	90.27%	1.78%
14	17	25968	USAA Casualty Insurance Company	TX	56,339,513	54,044,614	42,486,077	78.61%	1.59%
15	15	12966	Key Insurance Company	KS	53,260,645	52,346,193	41,100,584	78.52%	1.50%
16	16	39012	Safeco Insurance Company of Illinois	IL	51,807,923	51,714,805	41,075,042	79.43%	1.46%
17	19	10386	American Family Insurance Company	WI	47,892,073	43,526,954	36,999,514	85.00%	1.35%
18	13	21687	Mid-Century Insurance Company	CA	44,966,476	45,557,037	23,278,809	51.10%	1.27%
19	18	37478	Hartford Insurance Company of the Midwest	IN	40,307,421	38,674,988	31,441,824	81.30%	1.13%
20	29	11908	Mercury Casualty Company	CA	33,559,157	31,283,325	25,434,936	81.31%	0.94%
21	26	25143	State Farm Fire & Casualty Company	IL	33,376,879	30,161,770	26,990,947	89.49%	0.94%
22	42	22454	Mendakota Insurance Company	TN	32,844,003	22,966,582	16,535,569	72.00%	0.92%
23	23	21253	Garrison Property & Casualty Insurance Company	TX	31,804,720	29,836,820	24,447,537	81.94%	0.90%
24	34	29068	American Family Connect Property & Casualty Insurance Company	WI	26,677,781	24,557,314	29,165,933	118.77%	0.75%
25	68	12484	Liberty Mutual Personal Insurance Company	NH	25,495,357	20,141,981	14,146,979	70.24%	0.72%
Totals for Largest 25 Companies					3,014,989,177	2,859,070,401	2,503,160,580	87.55%	84.84%
Totals for All 177 Companies (122 Active Companies)					3,553,636,328	3,383,850,012	2,976,291,047	87.96%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

EXHIBIT IV -

Private Passenger Automobile Insurance by Premium: Largest 5 Insurance Groups by Market Share in 2021 and 2023

2023 – Largest 5 Groups

Rank	NAIC Group Code	Group Name	Direct Premiums Written	Direct Premiums Earned	Direct Losses Incurred	Pure Direct Loss Ratio	Market Share
1	176	State Farm Group	617,874,747	571,118,287	585,732,789	102.56%	17.39%
2	31	Berkshire Hathaway Group (GEICO)	607,564,315	591,355,877	599,107,613	101.31%	17.10%
3	155	Progressive Group	570,047,585	545,196,404	411,008,809	75.39%	16.04%
4	8	Allstate Insurance Group	364,347,003	353,768,620	339,020,944	95.83%	10.25%
5	200	United Services Automobile Association (USAA) Group	224,850,989	214,052,080	179,971,349	84.08%	6.33%
Totals for Largest 5 Groups			2,384,684,639	2,275,491,268	2,114,841,504	92.94%	67.11%
Totals for All 60 Groups (51 Active Groups)			3,553,636,328	3,383,850,012	2,976,291,047	87.96%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

2021 – Largest 5 Groups

Rank	NAIC Group Code	Group Name	Direct Premiums Written	Direct Premiums Earned	Direct Losses Incurred	Pure Direct Loss Ratio	Market Share
1	31	Berkshire Hathaway Group (GEICO)	535,528,900	520,300,667	448,717,669	86.24%	18.02%
2	155	Progressive Group	449,393,440	436,369,307	281,631,731	64.54%	15.13%
3	176	State Farm Group	446,752,624	437,261,243	289,001,886	66.09%	15.04%
4	8	Allstate Insurance Group	302,088,842	300,358,426	189,052,671	62.94%	10.17%
5	69	Farmers Insurance Group	222,392,021	223,257,117	130,181,777	58.31%	7.49%
Totals for Largest 5 Groups			1,956,155,827	1,917,546,760	1,338,585,734	69.81%	65.84%
Totals for All 58 Groups (49 Active Groups)			2,971,153,847	2,930,148,819	1,995,478,034	68.10%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2021

An "active group" is defined as a group that wrote a positive amount of direct premium during the calendar year.

EXHIBIT V -

Personal Automobile (PPA) Insurance Rate-Change History for the Largest 5 Groups (2023-2024)

State Farm Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
State Farm Fire & Casualty Company	Motorcycle	940	0.000%	1/1/2023
State Farm Fire & Casualty Company	Motorcycle	902	-7.637%	3/20/2023
State Farm Fire & Casualty Company	Motorcycle	963	0.000%	8/1/2023
State Farm Fire & Casualty Company	Motorcycle	941	-0.100%	8/14/2023
State Farm Fire & Casualty Company	Motorcycle	993	0.019%	5/6/2024
State Farm Fire & Casualty Company	Personal Auto Combinations	12,248	4.781%	8/14/2023
State Farm Fire & Casualty Company	Private Passenger Auto	11,357	0.000%	3/1/2023
State Farm Fire & Casualty Company	Private Passenger Auto	12,002	14.159%	3/20/2023
State Farm Fire & Casualty Company	Private Passenger Auto	12,973	0.000%	2/15/2024
State Farm Fire & Casualty Company	Private Passenger Auto	13,731	6.256%	5/6/2024
State Farm Fire & Casualty Company	Private Passenger Auto	14,992	5.562%	12/19/2024
State Farm Fire & Casualty Company	Recreational Vehicle	65	0.000%	3/20/2023
State Farm Fire & Casualty Company	Recreational Vehicle	43	-0.002%	3/20/2023
State Farm Fire & Casualty Company	Recreational Vehicle	82	0.010%	8/14/2023
State Farm Fire & Casualty Company	Recreational Vehicle	57	0.004%	8/14/2023
State Farm Fire & Casualty Company	Recreational Vehicle	90	0.013%	5/6/2024
State Farm Mutual Automobile Insurance Company	Motorcycle	11,558	0.000%	1/1/2023
State Farm Mutual Automobile Insurance Company	Motorcycle	11,515	-7.637%	3/20/2023
State Farm Mutual Automobile Insurance Company	Motorcycle	11,957	0.000%	8/1/2023
State Farm Mutual Automobile Insurance Company	Motorcycle	11,887	-0.163%	8/14/2023
State Farm Mutual Automobile Insurance Company	Motorcycle	12,453	0.026%	5/6/2024
State Farm Mutual Automobile Insurance Company	Personal Auto Combinations	449,958	24.095%	8/14/2023
State Farm Mutual Automobile Insurance Company	Private Passenger Auto	430,495	0.000%	3/1/2023
State Farm Mutual Automobile Insurance Company	Private Passenger Auto	453,146	9.168%	3/20/2023
State Farm Mutual Automobile Insurance Company	Private Passenger Auto	457,151	0.000%	2/15/2024
State Farm Mutual Automobile Insurance Company	Private Passenger Auto	472,743	16.114%	5/6/2024
State Farm Mutual Automobile Insurance Company	Private Passenger Auto	471,771	8.451%	12/19/2024
State Farm Mutual Automobile Insurance Company	Recreational Vehicle	19,539	0.000%	3/20/2023
State Farm Mutual Automobile Insurance Company	Recreational Vehicle	3,171	-0.003%	3/20/2023
State Farm Mutual Automobile Insurance Company	Recreational Vehicle	22,330	0.001%	8/14/2023
State Farm Mutual Automobile Insurance Company	Recreational Vehicle	3,907	0.007%	8/14/2023
State Farm Mutual Automobile Insurance Company	Recreational Vehicle	23,353	-0.00002	5/6/2024

United Services Automobile Association (USAA) Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Garrison Property and Casualty Insurance Company	Private Passenger Auto	10,989	10.392%	2/6/2023
Garrison Property and Casualty Insurance Company	Private Passenger Auto	11,063	10.867%	3/31/2024
United Services Automobile Association	Private Passenger Auto	26,840	13.928%	2/6/2023
United Services Automobile Association	Private Passenger Auto	26,356	11.608%	3/31/2024
USAA Casualty Insurance Company	Private Passenger Auto	21,286	9.691%	2/6/2023
USAA Casualty Insurance Company	Private Passenger Auto	21,164	13.960%	3/31/2024
USAA Casualty Insurance Company	Private Passenger Auto	23,992	6.460%	2/6/2023
USAA Casualty Insurance Company	Private Passenger Auto	23,576	15.532%	3/31/2024

Berkshire Hathaway Group (GEICO)

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
GEICO Advantage Insurance Company	Personal Auto Combinations	94,191	28.098%	8/3/2023
GEICO Advantage Insurance Company	Personal Auto Combinations	82,241	16.784%	2/3/2024
GEICO Casualty Company	Personal Auto Combinations	29,343	25.701%	8/3/2023
GEICO Casualty Company	Personal Auto Combinations	27,937	10.693%	2/3/2024
GEICO Choice Insurance Company	Personal Auto Combinations	34,658	23.367%	8/3/2023
GEICO Choice Insurance Company	Personal Auto Combinations	29,544	16.070%	2/3/2024
GEICO Choice Insurance Company	Personal Auto Combinations	13,235	0.000%	8/3/2023
GEICO Indemnity Company	Motorcycle	16,578	17.491%	1/19/2023
GEICO Indemnity Company	Motorcycle	15,238	4.936%	11/25/2023
GEICO Indemnity Company	Personal Auto Combinations	2,835	3.466%	8/3/2023
GEICO Secure Insurance Company	Personal Auto Combinations	78,490	27.398%	8/3/2023
GEICO Secure Insurance Company	Personal Auto Combinations	73,711	20.181%	2/3/2024
Government Employees Insurance Company	Personal Auto Combinations	4,854	0.000%	8/3/2023

Progressive Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Progressive Direct Insurance Company	Motorcycle	17,923	4.400%	8/4/2023
Progressive Direct Insurance Company	Motorcycle	20,514	8.464%	5/17/2024
Progressive Direct Insurance Company	Private Passenger Auto	124,565	9.252%	5/19/2023
Progressive Direct Insurance Company	Private Passenger Auto	132,515	16.967%	8/11/2023
Progressive Direct Insurance Company	Private Passenger Auto	131,147	2.767%	6/14/2024
Progressive Direct Insurance Company	Recreational Vehicle	6,942	-0.056%	12/8/2023
Progressive Northern Insurance Company	Motorcycle	11,464	1.800%	8/4/2023
Progressive Northern Insurance Company	Motorcycle	11,559	7.720%	5/17/2024
Progressive Northern Insurance Company	Private Passenger Auto	75,970	7.700%	5/19/2023
Progressive Northern Insurance Company	Private Passenger Auto	82,312	20.043%	8/11/2023
Progressive Northern Insurance Company	Private Passenger Auto	77,006	4.857%	6/14/2024
Progressive Northern Insurance Company	Recreational Vehicle	5,123	0.050%	12/8/2023

Allstate Insurance Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Allstate Fire and Casualty Insurance Company	Private Passenger Auto	93,217	0.000%	7/24/2023
Allstate Fire and Casualty Insurance Company	Private Passenger Auto	93,217	26.947%	1/15/2024
Allstate Fire and Casualty Insurance Company	Private Passenger Auto	94,804	10.811%	10/28/2024
Allstate Indemnity Company	Private Passenger Auto	3,117	20.908%	10/30/2023
Allstate Indemnity Company	Private Passenger Auto	2,755	8.079%	7/1/2024
Allstate Insurance Company	Private Passenger Auto	3,429	8.807%	8/5/2024
Integon Indemnity Corporation	Private Passenger Auto	229	0.000%	5/31/2024
Integon Indemnity Corporation	Private Passenger Auto	2,024	-4.633%	8/30/2024
MIC General Insurance Corporation	Private Passenger Auto	1,769	50.013%	10/23/2023
MIC General Insurance Corporation	Private Passenger Auto	3,813	57.554%	9/2/2024

EXHIBIT VI -
Home Insurance by Premium – Largest 25 Insurers – 2023

2023 Rank	2021 Rank	NAIC Company Code	Company Name	State of Domicile	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	1	25143	State Farm Fire & Casualty Company	IL	165,239,149	160,431,963	98,183,688	61.20%	17.79%
2	2	21652	Farmers Insurance Exchange	CA	63,417,589	59,941,828	44,136,737	73.63%	6.83%
3	6	36161	Travelers Property Casualty Insurance Company	CT	52,937,518	48,338,552	36,594,467	75.70%	5.70%
4	3	37907	Allstate Vehicle & Property Insurance Company	IL	51,992,598	48,979,315	32,513,578	66.38%	5.60%
5	4	37770	CSAA General Insurance Company	IN	42,887,049	41,102,201	24,035,031	58.48%	4.62%
6	5	17221	Homesite Insurance Company	WI	39,090,914	36,177,930	23,945,593	66.19%	4.21%
7	8	42404	Liberty Insurance Corporation	IL	31,065,259	29,802,357	16,821,752	56.44%	3.34%
8	7	25941	United Services Automobile Association	TX	27,338,371	26,541,482	18,819,951	70.91%	2.94%
9	12	11185	Foremost Insurance Company Grand Rapids, Michigan	MI	21,287,113	17,647,114	8,116,476	45.99%	2.29%
10	9	27998	Travelers Home & Marine Insurance Company	CT	21,178,206	21,514,701	11,081,452	51.51%	2.28%
11	11	10872	American Strategic Insurance Corp.	FL	20,059,125	18,378,712	8,642,660	47.03%	2.16%
12	14	20990	Country Mutual Insurance Company	IL	19,628,904	18,587,526	9,864,593	53.07%	2.11%
13	10	21660	Fire Insurance Exchange	CA	17,091,980	17,586,619	7,021,738	39.93%	1.84%
14	15	18600	USAA General Indemnity Company	TX	16,885,970	15,581,345	9,157,859	58.77%	1.82%
15	31	19690	American Economy Insurance Company	IN	16,165,494	14,468,178	13,271,017	91.73%	1.74%
16	17	25968	USAA Casualty Insurance Company	TX	15,534,251	14,704,102	11,215,570	76.28%	1.67%
17	13	17230	Allstate Property & Casualty Insurance Company	IL	14,842,086	15,009,548	7,189,566	47.90%	1.60%
18	20	28401	American National Property And Casualty Company	MO	14,168,858	12,899,746	10,725,980	83.15%	1.53%
19	19	19240	Allstate Indemnity Company	IL	12,909,262	12,802,740	7,047,306	55.05%	1.39%
20	22	11908	Mercury Casualty Company	CA	12,878,736	11,793,504	3,279,593	27.81%	1.39%
21	25	10386	American Family Insurance Company	WI	12,367,892	10,727,232	5,961,185	55.57%	1.33%
22	18	19275	American Family Mutual Insurance Company, S.I.	WI	12,320,573	12,385,737	6,941,809	56.05%	1.33%
23	27	42722	American Modern Property & Casualty Insurance Company	OH	11,732,811	9,960,552	6,647,820	66.74%	1.26%
24	16	24740	Safeco Insurance Company of America	NH	11,316,111	11,810,764	6,178,858	52.32%	1.22%
25	34	20397	Vigilant Insurance Company	NY	10,182,427	8,338,871	2,005,959	24.06%	1.10%
Totals for Largest 25 Companies					734,518,246	695,512,619	429,400,238	61.74%	79.07%
Totals for All 161 Companies (125 Active Companies)					928,922,739	883,230,218	548,610,324	62.11%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

EXHIBIT VII -

Home Insurance by Premium – Largest 5 Insurance Groups by Market Share in 2021 and 2023

2023 Rank	NAIC Company Code	Company Name	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	176	State Farm Group	165,239,149	160,431,963	98,183,688	61.20%	17.79%
2	69	Farmers Insurance Group	113,746,584	105,485,595	69,960,212	66.32%	12.25%
3	8	Allstate Insurance Group	101,368,615	97,589,833	54,841,842	56.20%	10.91%
4	3548	Travelers Group	76,682,960	72,410,732	49,458,703	68.30%	8.26%
5	473	American Family Insurance Group	76,453,304	72,000,334	44,244,591	61.45%	8.23%
Totals for Largest 5 Companies			533,490,612	507,918,457	316,689,036	62.35%	57.43%
Totals for All 71 Companies (59 Active Companies)			928,922,739	883,230,218	548,610,324	62.11%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

2023 Rank	NAIC Company Code	Company Name	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	176	State Farm Group	145,261,759	138,329,160	67,089,430	48.50%	18.85%
2	69	Farmers Insurance Group	98,840,548	97,861,850	51,652,240	52.78%	12.83%
3	8	Allstate Insurance Group	84,540,971	81,969,705	51,840,910	63.24%	10.97%
4	473	American Family Insurance Group	63,069,699	59,660,177	37,288,271	62.50%	8.18%
5	3548	Travelers Group	56,265,008	52,137,111	25,856,445	49.59%	7.30%
Totals for Largest 5 Companies			447,977,985	429,958,003	233,727,296	54.36%	58.13%
Totals for All 71 Companies (59 Active Companies)			770,672,944	737,398,775	408,204,476	55.36%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2021

An "active group" is defined as a group that wrote a positive amount of direct premium during the calendar year.

EXHIBIT VIII -

Home Insurance Rate-Change History for the Largest 5 Groups (2023-2024)

State Farm Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
State Farm Fire & Casualty Company	Home Insurance Combinations	213,904	0.000%	3/21/2024
State Farm Fire & Casualty Company	Mobile Homeowners	3,459	-0.037%	1/1/2024
State Farm Fire & Casualty Company	Other Homeowners	42,178	-0.002%	8/15/2024

EXHIBIT VIII -

Home Insurance Rate-Change History for the Largest 5 Groups (2023-2024)

Farmers Insurance Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Farmers Insurance Exchange	Home Insurance Combinations	58,098	22.771%	11/17/2023
Farmers Property & Casualty Insurance Company	Home Insurance Combinations	7,734	15.500%	10/10/2023
Fire Insurance Exchange	Home Insurance Combinations	23,222	4.689%	11/17/2023
Foremost Insurance Company Grand Rapids, Michigan	Mobile Homeowners	14,843	9.980%	9/1/2023
Foremost Insurance Company Grand Rapids, Michigan	Mobile Homeowners	14,600	5.200%	12/15/2024
Foremost Insurance Company Grand Rapids, Michigan	Owner-Occupied Home	792	21.516%	1/15/2025
Foremost Property and Casualty Insurance Company	Mobile Homeowners	2,472	14.030%	9/1/2023
Foremost Property and Casualty Insurance Company	Mobile Homeowners	2,209	8.983%	12/15/2024
Truck Insurance Exchange	Home Insurance Combinations	4,589	20.255%	11/17/2023

Allstate Insurance Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Allstate Indemnity Company	Condominium Homeowners	5,657	22.900%	3/6/2023
Allstate Indemnity Company	Condominium Homeowners	5,463	16.700%	9/16/2024
Allstate Indemnity Company	Owner-Occupied Home	3,936	0.000%	4/7/2024
Allstate Insurance Company	Condominium Homeowners	825	22.900%	3/13/2023
Allstate Insurance Company	Condominium Homeowners	676	34.897%	9/16/2024
Allstate Insurance Company	Mobile Homeowners	585	20.000%	1/15/2024
Allstate Insurance Company	Owner-Occupied Home	4,973	9.022%	5/8/2023
Allstate Property & Casualty Insurance Company	Owner-Occupied Home	13,080	9.001%	6/5/2023
Allstate Vehicle and Property Insurance Company	Owner-Occupied Home	40,758	4.913%	9/23/2024
Century-National Insurance Company	Home Insurance Combinations	5,030	6.800%	3/20/2023

Travelers Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
Travelers Property Casualty Insurance Company	Home Insurance Combinations	61,714	14.469%	2/23/2024

American Family Insurance Group

Company Name	Line of Insurance	Number of Policyholders Affected	Overall Rate Change	Effective Date (New Business)
American Family Insurance Company	Home Insurance Combinations	9,581	0.000%	1/1/2023
American Family Insurance Company	Home Insurance Combinations	10,128	0.000%	6/24/2023
American Family Insurance Company	Home Insurance Combinations	10,691	22.261%	11/1/2023
American Family Insurance Company	Home Insurance Combinations	11,678	27.873%	12/1/2024
American Family Mutual Insurance Company, S.I.	Home Insurance Combinations	9,311	10.500%	8/1/2023
American Family Mutual Insurance Company, S.I.	Home Insurance Combinations	9,727	8.344%	8/1/2024
American Family Mutual Insurance Company, S.I.	Home Insurance Combinations	9,578	-0.523%	11/5/2024
Homesite Insurance Company	Home Insurance Combinations	30,079	17.582%	1/27/2023
Homesite Insurance Company	Home Insurance Combinations	698	0.000%	8/11/2023
Homesite Insurance Company	Home Insurance Combinations	30,077	16.113%	11/17/2023
Homesite Insurance Company	Mobile Homeowners	719	21.500%	11/1/2023

EXHIBIT IX -

Medical Professional Liability Insurance by Premium – Largest 25 Insurers – 2023

2023 Rank	2021 Rank	NAIC Company Code	Company Name	State of Domicile	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	1	33391	ProAssurance Indemnity Company, Inc.	AL	16,935,883	17,076,236	10,461,414	61.26%	15.88%
2	3	11843	The Medical Protective Company	IN	12,370,915	11,571,811	3,651,338	31.55%	11.60%
3	2	33200	NORCAL Insurance Company	CA	9,253,978	9,707,168	6,844,532	70.51%	8.68%
4	4	11260	Nevada Mutual Insurance Company, Inc.	NV	4,740,365	4,887,635	5,356,353	109.59%	4.45%
5	12	42617	MAG Mutual Insurance Company	GA	4,516,251	4,045,818	2,394,288	59.18%	4.24%
6	5	14163	Emergency Capital Management LLC, a RRG	VT	4,207,925	4,434,251	2,152,071	48.53%	3.95%
7	7	11598	Applied Medico-Legal Solutions RRG	AZ	3,231,749	2,997,745	3,868,795	129.06%	3.03%
8	39	14906	COPIC RRG	DC	3,225,930	2,990,205	4,791,446	160.24%	3.03%
9	10	24856	Admiral Insurance Company	DE	3,009,356	2,836,391	324,577	11.44%	2.82%
10	8	20427	American Casualty Company of Reading, PA	PA	2,831,912	2,769,163	1,489,686	53.80%	2.66%
11	6	10638	ProSelect Insurance Company	NE	2,465,902	2,494,957	221,010	8.86%	2.31%
12	24	15211	Lone Star Alliance RRG	DC	2,336,095	1,987,882	1,300,908	65.44%	2.19%
13	18	35904	Health Care Indemnity, Inc.	CO	1,965,966	1,965,966	-24,703	-1.26%	1.84%
14	9	14484	Hudson Excess Insurance Company	DE	1,914,308	1,484,873	1,417,989	95.50%	1.80%
15	13	34495	The Doctors Company, An Interinsurance Exchange	CA	1,708,861	1,547,292	97,851	6.32%	1.60%
16	11	15738	Physicians Insurance RRG, Inc.	VT	1,684,945	1,638,659	1,063,892	64.92%	1.58%
17	19	33138	Landmark American Insurance Company	NH	1,579,149	1,425,265	727,440	51.04%	1.48%
18	15	26257	The Mutual RRG, Inc.	HI	1,473,458	1,473,458	-159,068	-10.80%	1.38%
19	17	20079	National Fire & Marine Insurance Company	NE	1,384,084	1,142,838	367,047	32.12%	1.30%
20	43	31127	Columbia Casualty Company	IL	1,340,555	956,745	584,592	61.10%	1.26%
21	44	17400	ProAssurance Specialty Insurance Company	VT	1,286,972	834,263	451,418	54.11%	1.21%
22	16	25054	Hudson Insurance Company	DE	1,275,836	1,396,166	3,419,274	244.90%	1.20%
23	20	43460	Aspen American Insurance Company	TX	1,172,979	1,262,869	160,676	12.72%	1.10%
24	21	44105	Ophthalmic Mutual Insurance Company RRG	VT	1,000,958	983,632	36,129	3.67%	0.94%
25	77	10725	Liberty Surplus Insurance Corporation	NH	949,114	907,912	144,553	15.92%	0.89%
Totals for Largest 25 Companies					87,863,446	84,819,200	51,143,508	60.30%	82.40%
Totals for All 139 Companies (98 Active Companies)					106,627,634	102,590,757	57,134,677	55.69%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

EXHIBIT X -

Approved NCCI Voluntary Loss-Cost Changes and Assigned-Risk Rate Changes by Industry Group: 2022-2024

Voluntary Loss-Cost Changes:
Impacts by Effective Date

Industry Group	3/1/2022	3/1/2023	9/1/2023 (Actuarial Annuity Table)	3/1/2024
Contracting	-11.5%	-4.1%	-3.3%	-4.1%
Goods & Services	-14.9%	-6.2%	-3.3%	-6.2%
Manufacturing	-12.3%	-2.9%	-3.3%	-2.9%
Office & Clerical	-14.0%	-4.8%	-3.3%	-4.8%
Miscellaneous	-14.6%	-6.4%	-3.3%	-6.4%
Overall	**-13.6%**	**-5.2%**	**-3.3%**	**-5.2%**

Assigned-Risk Rate Changes:
Impacts by Effective Date

Industry Group	3/1/2022	3/1/2023	9/1/2023 (Actuarial Annuity Table)	3/1/2024
Contracting	-12.8%	-2.5%	-3.3%	-3.5%
Goods & Services	-16.2%	-4.6%	-3.3%	-2.6%
Manufacturing	-13.6%	-1.3%	-3.3%	+0.4%
Office & Clerical	-15.3%	-3.2%	-3.3%	-2.8%
Miscellaneous	-15.9%	-4.8%	-3.3%	-4.6%
Overall	**-14.9%**	**-3.6%**	**-3.3%**	**-2.9%**

The filing, effective September 1, 2023, was made by NCCI in response to the Nevada Division of Industrial Relations ("DIR") adopting a revised Actuarial Annuity Table, pursuant to NRS 616C.495(6) which increased the discount rate for calculating permanent partial disability ("PPD") lump-sum benefits (for those claimants who elect lump sums over periodic payments) from 2.41% per annum to 3.77% per annum. Because the discount rate increased, the present value of future payment streams has decreased. Accordingly, the loss-cost impact is an overall decrease of -3.3%, effective September 1, 2023. The same impacts arose for the assigned-risk market.

EXHIBIT XI -
Average Approved Changes in Workers' Compensation Voluntary-Market Loss Costs and Assigned-Risk Rates

Effective Date	Approved Average Change in	Approved Average Change in Assigned-Risk
7/1/1999	-8.0%	-8.0%
1/1/2000	+6.4%	+6.4%
7/1/2000	-1.9%	-1.9%
7/1/2001 – First NCCI filings take effect.	-6.0%	+1.1%
7/1/2002	+1.5%	N/A
8/1/2002 (new business), 9/1/2002 (renewals)	N/A	-9.8%
1/1/2004	-12.3%	-9.1%
1/1/2005	-6.5%	-6.9%
3/1/2006	-0.3%	-2.6%
3/1/2007	+3.4%	+5.0%
3/1/2008	-10.5%	-10.1%
3/1/2009	-4.9%	-6.0%
3/1/2010	-7.6%	-3.7%
3/1/2011	-3.9%	-2.2%
3/1/2012	+1.0%	-5.2%
3/1/2013	+2.6%	+2.5%
3/1/2014	+3.2%	+3.3%
3/1/2015	-0.5%	-5.0%
3/1/2016	-5.5%	-4.2%
3/1/2017	-10.7%	-10.5%
3/1/2018	-2.3%	+0.2%
3/15/2018 – To reflect updated Actuarial Annuity Table Pursuant to NRS 616C.495(5)	+4.7%	+4.7%
3/1/2019	-8.1%	-7.3%
9/1/2019 – To reflect impact of Assembly Bill 370 (2019)	+3.3%	+3.3%
3/1/2020	-3.2%	-4.6%
9/1/2020 – To reflect updated Actuarial Annuity Table Pursuant to NRS 616C.495(5)	+3.1%	+3.1%
3/1/2021	-5.2%	-9.9%
3/1/2022	-13.6%	-14.9%
3/1/2023	-5.2%	-3.6%
9/1/2023 – To reflect updated Actuarial Annuity Table Pursuant to NRS 616C.495(6)	-3.3%	-3.3%
3/1/2024	-1.8%	-2.9%

EXHIBIT XII -
Workers' Compensation Insurance by Premium – Largest 25 Insurers – 2023

2023 Rank	2021 Rank	NAIC Company Code	Company Name	State of Domicile	Direct Premium Written	Direct Premium Earned	Direct Loss Incurred	Pure Direct Loss Ratio	Market Share
1	1	16535	Zurich American Insurance Company	NY	24,634,708	22,920,758	7,930,106	34.60%	5.10%
2	7	42376	Technology Insurance Company, Inc.	DE	16,604,512	17,756,183	10,304,126	58.03%	3.44%
3	157	21113	United States Fire Insurance Company	DE	15,362,050	15,307,890	13,929,774	91.00%	3.18%
4	4	27847	Insurance Company of the West	CA	15,008,160	14,517,436	11,546,101	79.53%	3.11%
5	2	38970	Markel Insurance Company	IL	14,691,544	14,784,011	7,977,824	53.96%	3.04%
6	5	33600	LM Insurance Corporation	IL	14,598,596	14,505,494	12,533,378	86.40%	3.02%
7	10	38318	Starr Indemnity & Liability Company	TX	13,088,329	13,190,185	6,202,555	47.02%	2.71%
8	3	25674	Travelers Property Casualty Company of America	CT	12,820,886	13,026,843	11,683,613	89.69%	2.65%
9	8	10346	Employers Preferred Insurance Company	FL	10,549,212	10,369,215	10,690,229	103.10%	2.18%
10	6	40517	WCF National Insurance Company	UT	9,240,215	10,819,863	11,259,109	104.06%	1.91%
11	9	19399	AIU Insurance Company	NY	9,032,973	8,389,358	2,140,022	25.51%	1.87%
12	34	19879	Security National Insurance Company	DE	6,970,365	6,567,241	4,616,883	70.30%	1.44%
13	99	21075	Transverse Insurance Company	TX	6,799,635	6,102,798	4,752,598	77.88%	1.41%
14	14	24147	Old Republic Insurance Company	PA	6,724,295	6,766,184	4,645,542	68.66%	1.39%
15	28	11150	Arch Insurance Company	MO	6,613,548	6,069,249	2,556,847	42.13%	1.37%
16	24	25658	Travelers Indemnity Company	CT	6,584,112	6,329,920	4,306,127	68.03%	1.36%
17	22	43575	Indemnity Insurance Company of North America	PA	6,425,012	6,706,482	1,746,021	26.03%	1.33%
18	13	40142	American Zurich Insurance Company	IL	6,222,533	5,967,148	716,255	12.00%	1.29%
19	70	22667	ACE American Insurance Company	PA	5,773,990	6,163,281	6,118,784	99.28%	1.20%
20	16	25682	Travelers Indemnity Company of Connecticut	CT	5,687,415	5,480,395	4,557,449	83.16%	1.18%
21	23	29459	Twin City Fire Insurance Company	IN	5,436,140	5,654,910	7,355,667	130.08%	1.13%
22	21	31895	American Interstate Insurance Company	NE	5,141,261	5,182,580	1,853,182	35.76%	1.06%
23	26	10510	Carolina Casualty Insurance Company	IA	4,962,686	4,609,166	6,040,114	131.05%	1.03%
24	20	41394	Benchmark Insurance Company	KS	4,747,014	5,187,608	2,778,564	53.56%	0.98%
25	29	20281	Federal Insurance Company	IN	4,493,697	4,891,328	818,604	16.74%	0.93%
Totals for Largest 25 Companies					238,212,888	237,265,526	159,059,474	67.04%	49.33%
Totals for All 334 Companies (289 Active Companies)					482,930,096	477,772,608	296,959,224	62.15%	100.00%

Source: NAIC I-Site+ – Market Share and Loss Ratio Summary Report, Calendar Year 2023

Nevada Division of Insurance

2025 Insurance Market Report

/Pursuant to Nevada Revised Statute 679B.410

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