

July 25, 2025

Director of Regulatory Affairs  
The Maryland Insurance Administration  
200 St. Paul Place, Suite 2700  
Baltimore, Maryland 21202

Via Email to: [insuranceregreview.mia@maryland.gov](mailto:insuranceregreview.mia@maryland.gov)

Re: Amendments to Title 31.15.11.06- Private Passenger Motor Vehicle Insurance — Credit History Use Disclosure — Premium Quotation.

The APCIA appreciates the opportunity to provide comments on the draft regulation. The American Property Casualty Association (APCIA) is a national trade organization whose members write approximately 66.9% of Maryland's personal auto insurance market. APCIA welcomes the opportunity to comment to the Maryland Insurance Administration (MIA) draft regulation 06 Private Passenger Motor Vehicle Insurance — Credit History Use Disclosure — Premium Quotation.

The proposal adds specific notice requirements to the existing requirement for an insurer to advise an applicant of its use of credit history and the applicant's ability to request a quote that identifies the portion of the premium that is attributable to the applicant's credit history. It requires that this disclosure:

- (a) Be printed in a prominent location on an electronic or paper application that is completed by the applicant; or
- (b) Be verbally relayed to the applicant by the representative of the insurer who completes the application on behalf of the applicant.

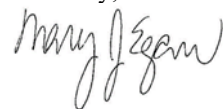
It further requires that if the disclosure is verbally relayed to the applicant, "the representative of the insurer who completes the application on behalf of the applicant shall document the date, time, and manner that the disclosure was provided in the application file."

We circulated the proposed language to our members writing private passenger motor vehicle insurance in Maryland and we received comments from several member insurers.

- One member noted that the company currently does not have fields in its system to capture the required date and time stamp, such that a system change would be required to add such fields. The member further noted the potential impact of such additional programming costs on policyholders.
- A member asked whether the new requirements would be applicable to new business only or also to renewals.
- Another point made was that, due to the need to make form and system changes, a minimum of six months for implementation should be sought.

Thank you for your consideration of these comments. Please do not hesitate to contact us if you have questions, need additional information, or would like to meet to discuss further.

Sincerely,



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