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## **OIR Workshop on Uniform Mitigation Verification Form Report (2-17-26)**

The Florida Office of Insurance Regulation (OIR) held its fourth workshop today (February 17, 2026) to solicit questions, comments, and suggestions in its ongoing efforts to update [Rule 69O-170.0155](#) and its growing list of forms. The last workshop in September 2025 (see our [special report](#), including background) resulted in OIR producing an updated Uniform Mitigation Verification Inspection Form ([Form OIR-B1-1802](#)) for insurance companies to use with their policyholders in determining hurricane mitigation discounts. Legislation enacted in 2023 requires OIR to reevaluate and update the mitigation features that qualify for discounts and the amount of discounts every five years, starting in 2025.

The Governor and Cabinet, sitting as the Financial Services Commission (which sets state insurance policy for OIR to carry out) [approved](#) the Rule and Form 1802 last fall. The method for submitting the form was still up in the air until recently, when OIR released this reporting tool/spreadsheet titled [Uniform Mitigation Verification Form Report](#) (Form OIR-B1-600), with an effective date of April. It's this form – essentially a data call – that OIR wants insurance companies to use in submitting the mitigation inspection form data in mass, and that was the subject of today's workshop.

Today's workshop was attended by various insurance company representatives and associations representing companies, as well as inspection firm representatives, appearing in person and by conference phone, and was the first opportunity to ask questions about Form B1-600. It also raised issues about the Rule and Form 1802. By the end of the 90-minute session, OIR representatives admitted the Rule itself, as well as Form 1802, may need more work.

OIR staff participating were Anoush Brangaccio, Senior Policy Advisor; Ryan Orbe, Chief Legal Counsel of Administration; and Stephanie Roman Caban, Assistant General Counsel. Together with Richie Frederick, Director of Property & Casualty Review, and assisted by IT Director Rebecca Smith, they are responsible for implementing the updated forms and new discounts.

Here are the issues discussed today, with notable comments, questions, and suggestions.

### **Using the Updated Form 1802 vs. the Old One**

**Ryan Orbe** established up-front that OIR is only looking at the new (updated) Form 1802 to be reported by carriers – not any information from the old forms – beginning April 1, 2026, and

that given the inspection forms are valid for five years, that this therefore would be phased-in over the next five years, as the current forms gradually expire. So OIR does not expect a deluge of forms on April 1 and **the Form B1-600 data call only applies to reporting the new inspection forms.**

**Richie Frederick**, commenting on the data call Form B1-600, said carriers can choose to upload multiple Form 1802 verification forms in a single file or upload multiple spreadsheets if necessary. He said OIR is still testing the capacity of the reporting system.

### **A 'Significant Undertaking'**

**George Feijoo, representing the Florida Insurance Council (FIC)**, said “This reporting structure represents a significant new undertaking for insurers ... and may ultimately necessitate adjustments to the underlying rule language to ensure that it produces accurate, reliable data without creating unintended duplication or unnecessary cost burdens for all parties.” The Rule requires insurance companies receiving an 1802 inspection form on an active policy to submit a copy to OIR within 60 days of a rate change or 60 days from the effective date of the policy, whichever is later.

**Among his concerns were the costs involved in manual input of data** required by Form B1-600. “That's a huge deal. It's manually taking information from the form and putting it into the spreadsheet, and those are jobs that need to be hired in the short term to accomplish this. We have some members that estimate 1,200 to 1,700 forms per month, which would need new staffing or reallocation of personnel. So this is time consuming, costly and not only that, but prone to error as well. Automation is certainly possible in the long term, but it's going to require programming, system build-out, and extensive testing, and would not be able to be completed by April 1.”

### **A 'Big Ask'**

**Chris Chandler, Vice President of Operations at Florida Peninsula Insurance, Edison Insurance, and Ovation Home Insurance Exchange**, said “I am very concerned about this new requirement. It just landed on my desk last week, so it's very new in the industry. I'm not sure if many carriers are aware that this requirement is coming fast and furious, and need to start being prepared for it.” He said his companies receive 1,600 mitigation forms a month and he estimates it will take 15 minutes to manually input each form into the reporting spreadsheet, as there is no automated way to do it today.

“I have looked at the Excel spreadsheet that's part of Form B1-600. There's over 70 new data elements in there that we don't currently collect today, most of it on that form we don't currently collect today. So it's going to require a team of people to build a system to start

collecting that data, and then forms to transmit that data, and then three is how you're going to quality control that being three carriers," said Chandler.

He urged OIR to push back the April 1 implementation date "maybe a few months", review whether all that data truly needs to be collected, and consider a testing period to make sure data transmission is working correctly.

### **'Extraordinary Cost' Through Increased Regulatory Reporting**

**Travis Miller, Shareholder of the Radey Law Firm**, also urged OIR to re-examine the 70+ data fields in the spreadsheet to make certain all that information really needs to be captured from the Form 1802 to assist in OIR's future policymaking. "I know the default position is probably 'It's in the 1802 we want it. Tell us about it.' But if you really think about things like the inspector's name, license, type, inspection company phone number, do we need to be reporting the inspection company's phone number or not? So if we don't need it for analysis later, then we may want to leave it out of this."

Miller also noted these changes are very comprehensive beyond the current system, and when coupled with other increased reporting required by property insurance companies, including monthly by zip code reports and group capital calculation, "the cost is extraordinary."

"What this form is about, what these tables are about, are giving a discount off of a rating plan, off of a premium. That's what we're doing. So your method right now may be that you take the form, the computer figures out on the table, but that person gets a 42% discount off of the wind rating. So the number that's stored in the system is 42%. It's not roof to wall connection, opening protection, all of these fields. If you go ask the system what it knows about the discount, it knows 42. That's it. So to move to a system, to a process in which each and every element of that is not only looked at, but captured in the system in a way that can be electronically rather than manually done, is actually a bigger undertaking than I think it's being given the credit for. This is a big deal," said Miller.

### **Submission trigger:**

**Feijoo Q:** "If the submission trigger is tied to the effective date of the policy, does that mean the same 1802 form must be submitted each year upon renewal, even if no mitigation features have changed?"

**Brangaccio replied:** "I'd say no, if there's no change ... I feel like once it's renewed, it's already bound, it's there, and there's no more rate change. The rate changes with the first time you kind of implement it."

Feijoo suggested whether it would be better to trigger this instead to the inspection form itself, “which sounds like that is the unique data point that you want is a new and different inspection form.”

### **Rate Change vs. Premium Discount**

**Feijoo Q:** “The other trigger is tied to a rate change. Does a rate change mean a rate change, (as) it may not be a rate change, but a premium change caused by receipt of a new 1802 form? Or any rate change filed by the insurer, even if unrelated to mitigation features?”

**Brangaccio replied:** “I think the intent was, whatever is tied to the 1802 form, to that initial one,” adding that if it’s being interpreted as too broad, OIR would have to look at that.

**Frederick replied:** “If the mitigation credits are changing, that’s when we kind of want to see the 1802 which would generally be a new inspection. It was not meant to apply to any rate change.”

**Feijoo Q:** “But would that be a premium change or natural rate change? If somebody submits a (mitigation) form, they get that premium discount that already exists within the existing rate structure of that filing, right? But it’s not necessarily a rate change, right?”

### **Anthony Kuhns, Senior Product & Actuarial Manager with Cypress Property & Casualty**

**Insurance, weighed-in:** “If you were to submit your new form, but we haven’t yet changed the wind loss mitigation factor table, you could end up with the same wind loss mitigation discount. So you wouldn’t have a rate change, but you would have a new form on file.”

**Brangaccio replied,** noting that the April 1 effective date is tied to OIR’s existing discount schedule, a schedule that will change once OIR updates the discounts, “There might be, in this immediate future for this project, there might be twice reporting, actually. I don’t know. We’ll have to talk about that.”

From the above discussion, **it appears that carriers only have to report forms as they receive them OR if the policy receives a new premium as a result of the wind mitigation credit.**

### **Daily vs. Bundled Submissions**

Given that policies are issued and renewed every day, OIR clarified that carriers may make daily submissions into the system or may batch submissions together, so long as all are under 60 days old.

### **Agents Receiving an 1802 Form vs. the Insurance Company Receiving It**

OIR clarified that only mitigation reports received by the carrier need to be reported. OIR will defer to a carrier’s own internal practice for dealing with forms from agents in applying

discounts and is not looking to change any carrier's business practices. Nor is OIR requiring insurance companies to require new mitigation forms after the old ones expire. "As an insurance company, if you don't require them to go get another one, because nothing has changed, then until you get a new one (at that point) ... that's what we're interested to collect," said Brangaccio. **1802 Forms received by the agent and not sent to the carrier are therefore not part of the Rule.**

### **What if fields on the Form B1-600 Spreadsheet are left blank?**

Fields left blank by the inspector on Form 1802 leaves the carrier with little choice but to leave those data fields blank on the spreadsheet. The question was raised: What fields left blank will invalidate a B1-600 submission? "That's something we've been discussing a bit internally, to figure out which one of these have to actually be filled in to be a valid form," said OIR's IT Director Rebecca Smith. Brangaccio noted that some fields have the option to mark "Other" or "None." She asked carriers to let OIR know if there are fields they see that are consistently left blank or are creating an issue. "We could then see about addressing that in the template."

Feijoo suggested, and **OIR agreed to provide carriers with a sample completed Form 1802 and correspondingly completed B1-600 spreadsheet as examples to ensure uniform compliance.**

### **Requested Delay of April 1 Implementation**

Feijoo, later joined by others, requested OIR delay the April 1 implementation date of this program. OIR's Richie Frederick asked how much of a delay are carriers considering. Feijoo suggested that would be unknown, especially if a Rule change was made, in addition to any submission process changes.

### **Why Not Let Inspectors Upload Form 1802 and/or the Spreadsheet?**

**Anthony Kuhns, Senior Product & Actuarial Manager with Cypress Property & Casualty Insurance**, asked if OIR gave any consideration to the possibility of any other parties completing the data call information. "As I looked at the form last week, and at that point, I was trying to fill it in with a policy that we already had with the information we had in the database, and I thought, 'Should the inspector be filling this out?'"

**Brangaccio replied**, "The Office doesn't have any regulatory jurisdiction over inspectors."

### **Discounts Without Forms?**

**Lisa Miller, former Florida Deputy Insurance Commissioner and CEO of Lisa Miller & Associates Q:** "Many companies that I work with don't require a (wind mitigation discount inspection) form, and if the house is five years old or newer, they assume, and they use it on the

honor system, that these new wind mitigation features are part of the home. Companies don't want to go taking forms that they don't need to. Have you thought about that?

**Brangaccio replied,** "We're not making you get forms in a situation you don't normally get forms. Nobody's requiring an insurance company to require an 1802 form."

Miller also asked if OIR would authorize insurance companies, working with technology companies providing an API (Application Programming Interface) between an inspector's Form 1802 data and OIR's data call spreadsheet to upload that data on behalf of the insurance company.

**Stephanie Roman Caban replied,** "I think one concern with having a wind mitigation inspection entity do it would be, what are they uploading, and when are they uploading? Do they know that the policy has been bound?" **Brangaccio added,** "We're looking for it to be tied to an insurer."

**Brangaccio also reminded workshop participants** why the new legislative mandate that requires OIR to reevaluate and update the mitigation features that qualify for discounts and the amount of discounts every five years, is important. "We ask insurance carriers for claims data, hurricane data, and sometimes the turnaround has been quick, or they haven't been able to give us stuff. So having this additional information with whatever else we get, collecting it all the time, will help. This is getting the (Form) 1802 so we know what's out there. Then if we get claims data, we can kind of match it up by address and things like that. How did homes fare after hurricanes (that had previous mitigation)? This should be very valuable for us," she said.

After today's workshop, OIR released by email to interested parties these [Instructions for the Uniform Mitigation Verification Form Report](#) (Form B1-6000) as a downloadable Word document.

There are other outstanding issues regarding this overall Rule change. OIR has not released updates on related forms required to fully carry out this program, including the actual mitigation discount credits (Forms [1699](#) and [1700](#)), and the discounts schedule ([Form 1655](#)) that insurance companies will use to generate and communicate the policy discount to the consumer. **Brangaccio acknowledged that,** saying "we're looking to update the discounts. And obviously, once we, when we do those, then we look at what's added."

**OIR's Ryan Orbe,** in closing the workshop, reminded participants that "at this point in time, this is the draft. When the time comes to finalize it, it would be published as a proposed rule ... so theoretically, there could be more steps after that point, if we needed to have a public hearing or anything like that on the language to get it settled ... I'm saying that this could tweak a little bit, of putting requirements in the form. Really any requirement should be something that is already in the rule itself, or in the form itself, or in the (Form) 600 or the (Form) 1802, so I'm

being very cognizant of that,” he said, adding that OIR is considering taking the matter back to the Governor and Cabinet.

The public comment period on the updated Form B1-600 will remain open through noon this Thursday, February 19, 2026. Comments can be emailed to Stephanie Roman Caban, Assistant General Counsel, at [Stephanie.RomanCaban@flor.com](mailto:Stephanie.RomanCaban@flor.com).

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