



Jane Kim

Candidate Questionnaire: California Insurance Commissioner

November 2026 General Election

Instructions to Candidates

*Please provide complete, specific answers to each question. Responses will be unedited and shared with independent insurance agents and brokers throughout California and may be published in industry communications. Please return completed questionnaires by **Sept. 11, 2026** to Stephen L. Young, IIABCal General Counsel, at syoung@iiaabcal.org.*

Reinsurance Cost Recognition & Catastrophe Modeling in Rate Filings

Q1: Do you support allowing insurers to include reinsurance costs in California rate filings, and to use forward-looking catastrophe models (rather than solely historical loss data)— provided they are using PRID-approved models, and have met requirements to write more policies in underserved areas? Please explain your position and any conditions you would place on such use.

- I support the use of forward-looking catastrophe models, and I support the public model as a benchmark alongside them. Historical loss data cannot capture conditions that are changing this fast, and good models are also the best tool we have for identifying where mitigation dollars will do the most to bring rates down. My conditions are transparency and accountability. For any model used, I believe the department must be able to see and test the assumptions, data inputs, and mitigation credit factors, not just the outputs. Model-based rates should be paired with mandatory mitigation credits that are actuarially consistent with the same model.
- On reinsurance, my concern is that these costs are set in global markets and passed to California homeowners with almost no visibility into whether they are

reasonable. My chief concern is making sure these rates are not excessive and we need greater transparency to fully understand whether this is the case.

Q2: How would you balance the need for rate adequacy with consumer protection against excessive rates?

- Balancing adequacy and affordability without addressing underlying risk leads to a market where carriers do not write and consumers cannot buy. My focus is on putting the weight of the office behind mitigation at scale so that the justified rate comes down over time rather than up.

Expedited Rate Review Process

Q3: What staffing, technology, or process changes would you prioritize at CDI to reduce rate filing backlogs and expedite rate reviews?

- I have heard a range of explanations for the backlog: understaffing at the Department, insurers filing incomplete applications, and time added by contested proceedings. It is also too early to know whether the changes made under the current Commissioner's administration have effectively shortened review times while keeping the process fair. If elected, I will audit the rate review process end to end, publish the findings, and target the real root causes.

Insurer Commitments to Underwrite in High-Risk Areas

Q4: The SIS requires insurers receiving rate relief to write a proportional share of policies in high-risk areas, including wildfire-prone communities. Do you support this "give-and-get" framework? How would you define "high-risk" areas for purposes of insurer writing obligations, and how often would those designations be updated?

- The framework is a step, but it is not enough, and as written it is gameable. Insurers can satisfy their commitment by cherry-picking the safest homes within a distressed ZIP code, shrink their overall footprint to shrink their obligation, or elect the 5 percent growth alternative and stretch it across the two-year compliance window. And nothing in the framework prevents a carrier from simply declining to participate. The result for agents is volatility: a client who finds coverage this year has no assurance of renewal next year.
- I support commitments with teeth, measured at the property level rather than the

ZIP level, and enforced with consequences for non-compliance. But the long term answer is reducing the underlying risk so customers have access to affordable insurance.

- High-risk designations should be defined at a sub-ZIP level using multiple datasets and models, including the public model being developed. I believe we must find the right balance of designation updates to be frequent enough to reflect longer term changes in underlying conditions but consistent enough for mitigation impacts to show up.

Wildfire Mitigation Discounts and Credits

Q5: Do you support requiring insurers to offer premium discounts to homeowners and businesses that take documented wildfire mitigation steps? How would you standardize and verify mitigation discounts or credits were actuarially credible?

- I support requiring minimum premium discounts for documented mitigation, set at levels that reflect the best actuarially credible evidence of risk reduction.
- I would push for greater transparency in commercial models so we can verify their assumptions, data, and methodologies. In parallel, I would support using the public catastrophe model being developed to serve as a key benchmark.

Q6: How would you work with local governments, CAL FIRE, and insurers to promote and fund wildfire mitigation efforts in underserved communities?

- In the near term, I see the DOI's role as convening and leading: aligning CAL FIRE, the Office of Emergency Services, the Wildfire Conservancy, and local fire districts around a shared map of where mitigation dollars reduce insurance risk the most, and getting insurers to commit their own model outputs to that map so public money goes where it actually lowers premiums. I would challenge insurers to allocate parts of their overall profit to investing in community-wide mitigation in our most vulnerable, underserved communities.
- Long term, I do not believe this level of coordination and sustained funding can come from the structures we have. That is why I am pursuing a nonprofit public natural disaster insurance program that can pool wildfire risk, coordinate mitigation at scale, and reinvest surplus into the highest-risk, highest-need communities.

Reducing FAIR Plan Enrollment

Q7: What is your overall strategy for depopulating the FAIR Plan and returning policyholders to the admitted market, while also assuring the consumers do not end up in a less advantageous policy?

- The only durable way to depopulate the FAIR Plan is to make those homes and communities insurable again. That means accelerating mitigation at community scale now: home hardening, defensible space, and landscape-level fuel reduction, coordinated and funded so that entire neighborhoods reduce their risk together rather than one homeowner at a time.
- As risk comes down, policyholders can return to the admitted market with full coverage, at more affordable rates that reflect the mitigation they have done.

FAIR Plan Financial Stability

Q8: Given the FAIR Plan's exposure concentration in wildfire-prone areas, do you support and will you follow existing law requiring FAIR Plan rates to be actuarially commensurate with the exposures being underwritten?

- We must depopulate the FAIR Plan but using price as the primary lever to force people off and onto similarly unaffordable premiums in the admitted market is not a sustainable long term solution. The underlying risk must be reduced - it is the only way to achieve long term stability.

Q9: What other steps, if any, do you support to strengthen the Plan's financial structure? What role, if any, should the state play in backstopping FAIR Plan losses?

- The FAIR Plan is run by the carriers that offload risk onto it, and the people it affects most, including agents, brokers, and policyholders, sit at the table without a vote. I would push for voting rights for producer and consumer representatives, public meetings, and full disclosure of the governing committee's decisions and the analysis behind them.
- The FAIR Plan was never designed to be the wildfire insurer of last resort, and it should not be the place we build a public backstop. Taxpayers should not be the backstop for a carrier-run pool that has been used as a dumping ground.

Q10: Do you support current CDI rules allowing insurers to recoup some or all of any FAIR Plan assessments following a major loss event?

- No. The current rules let carriers pass reinsurance costs to policyholders and then pass FAIR Plan assessments to the same policyholders after a loss. These mechanisms shift risk onto consumers; none of them reduces it. I would revisit the recoupment rules, at minimum restricting recoupment for carriers that have not met their writing commitments, and redirect that energy toward reducing the exposure that makes assessments necessary.

FAIR Plan Coverage Adequacy

Q11: Currently, the FAIR Plan offers limited coverage compared to standard homeowners policies. Do you support expanding FAIR Plan coverage options (e.g., liability, loss of use, personal property) while the Plan remains a market of last resort?

- Policyholders on the FAIR Plan today deserve coverage they can actually rely on, and I support targeted improvements where they can be done without deepening the concentration problem. But we cannot keep adding wings to a car and expect it to fly. The FAIR Plan was not designed to be a full-service wildfire insurer. My focus is getting people off it: mitigation at scale so admitted carriers write these homes, and ultimately a public entity built for wildfire risk.

Education and Licensing Pathways

Q12: What role do you believe the CDI should play in promoting insurance as a career to young Californians, including outreach to high schools, community colleges, and universities?

- CDI can play an important role in recruiting and developing the next generation of insurance professionals by pushing the idea that insurance is where climate risk meets people's economic lives.
- CDI can support development of programs that help young Californians find ways to innovate the insurance system, focusing on transformative ways to make insurance affordable and available for all in the face of climate change.

Technology, Innovation, and the Next Generation

Q13 How would you ensure that technological innovation in insurance distribution does not actually harm consumers or displace or disadvantage independent agents and brokers relative to direct-to-consumer models?

- Agents and brokers provide something a quote engine does not: judgment about whether coverage is adequate, advocacy when a claim goes wrong, and advice on mitigation that can actually lower a premium.
- I believe every distribution channel should be held to the same standard of quality service and responsibility to the best outcomes for customers. A direct-to-consumer platform that sells a homeowner a policy with inadequate limits or steers them by algorithm into a worse product should face the same enforcement. I would push for more transparency in compensation and steering incentives across all channels, including carrier-owned ones.
- Ultimately, I see a possible future where agents and brokers are at the center of mitigation at scale. Agents are the ones sitting with the homeowner explaining why their premium went up. They can also be the ones who walk that homeowner through a certified mitigation pathway that brings it down, and explore shifting compensation to being rewarded for helping bring risk down and increasing long term stability.

Agent and Broker Input at CDI

Q14: Would you commit to regular consultation with IIABCal and other producer associations, including town halls or advisory committee participation?

Yes, I will have an open-door policy.

Climate Risk, Resilience, and Long-Term Market Sustainability

Q15: How do you view the Commissioner's role in addressing the intersection of climate change and insurance market availability? What is the appropriate scope of CDI action on climate risk?

- I believe insurance sits at a critical intersection of climate crisis and tangible economic costs. We cannot sit idly by because we cannot control the primary drivers of risk. We must take an outsized role in mitigation and use the office as a bully pulpit for stronger climate policies.

Regulatory Philosophy and CDI Operations

Q16: What qualifications, experiences, and relationships do you bring to this office that make you the best candidate to address California's insurance crisis?

- This job comes down to three things: negotiating, regulating, and legislating. I have done all three of them my entire career. I have spent twelve years as an elected legislator on the San Francisco Board of Supervisors and Board of Education, a civil rights attorney, and a consumer advocate.
- And I am the only candidate in this race who has spent years organizing across California, starting as state political director for Bernie Sanders. That means real relationships with local elected officials, community leaders, and neighborhood advocates in every corner of this state. That is what I am bringing into the Department of Insurance. What California needs is a watchdog for consumers, not a lapdog for corporations.

Q17: What are your top three priorities for CDI in your first 100 days as Commissioner?

- I will pursue stronger price discounts for mitigation, with a focus on making sure we have the right funds to address mitigation at scale
- I will audit the FAIR Plan's governing committee for greater transparency on their underwriting and broader financial decisions.
- And I will launch a wildfire taskforce to audit the secret models these companies use to price your risk. If they are using these models to raise our premiums, we deserve full transparency to make sure they are fair and accurate.

SUBMISSION INSTRUCTIONS

Item Details**Response****Deadline** Sept. 11, 2026**Submit To** syoung@iiabcal.org**Format** PDF or Word document preferred**Length Guidance** No strict limit; concise and specific answers preferred**Publication** Responses will be shared with member agents, brokers, and the public

This questionnaire was prepared by IIABCal on behalf of California's independent insurance agents and brokers. We are committed to a fair and nonpartisan process and have sent identical questionnaires to both major candidates for California Insurance Commissioner in the November 2026 General Election.