

**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I**  
**OFFICE OF THE DIRECTOR**  
**DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**  
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DIRECTOR | KA LUNA HO'OKELE

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DEPUTY DIRECTOR | KA HOPE LUNA HO'OKELE

## **Testimony of the Department of Commerce and Consumer Affairs**

**Before the**  
**Senate Committee on Commerce and Consumer Protection**  
**Friday, March 14, 2025**  
**9:30 a.m.**  
**State Capitol, Conference Room 229 and via Video Conferencing**

**On the following measure:**  
**H.B 544, H.D. 1, RELATING TO PET INSURANCE**

Chair Keohokalole and Members of the Committee:

My name is Jerry Bump, and I am the Acting Insurance Commissioner of the Department of Commerce and Consumer Affairs' (Department) Insurance Division. The Department supports this bill.

The purpose of this bill is to establish a regulatory framework specifically for pet insurance based on the National Association of Insurance Commissioners' Pet Insurance Model Act.

The Department supports the initiative to incorporate consistent practices, benchmark standards, and accountability into Chapter 431, Hawaii Revised Statutes, to ensure that pets, as beloved members of many of Hawaii's families, have appropriate protection and recourse throughout their lives.

Thank you for the opportunity to testify.



**HAWAII VETERINARY MEDICAL ASSOCIATION**  
**P.O. Box 61309, Honolulu, Hawaii 96839-1309**

March 10, 2025

Committee on Commerce and Consumer Protection  
Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair

RE: HB 544 HD1, Relating to Pet Insurance

Dear Committee on Commerce and Consumer Protection,

On behalf of the Hawaii Veterinary Medical Association (HVMA), we are in support of HB 544 HD1 to establish a regulatory framework for pet insurance in Hawaii based on the National Association of Insurance Commissioners (NAIC) Model Law.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Yoshicedo", is written over the printed name.

Jill Yoshicedo, DVM  
Executive Vice-President  
Hawaii Veterinary Medical Association



## Hawaiian Humane Society

People for animals. Animals for people.

Date: March 10, 2025

To: Chair Sen. Jarrett Keohokalole  
Vice Chair Sen. Carol Fukunaga  
and Members of the Committee on Commerce and Consumer Protection

Submitted By: Stephanie Kendrick, Director of Community Engagement  
Hawaiian Humane Society, 808-356-2217

RE: Testimony in support of HB 544, HD1: Relating to Pet Insurance  
Friday, March 14, 2025, 9:30 a.m., Room 229 & Videoconference

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On behalf of the Hawaiian Humane Society, thank you for considering our support for House Bill 544, HD1, which establishes a regulatory framework specifically for pet insurance based on the National Association of Insurance Commissioners' Pet Insurance Model Act.

This measure protects consumers by holding pet insurance providers accountable to transparency and uniform use of defined terms. It is sound public policy.

Pet insurance is increasingly important to pet owners as the costs associated with veterinary care continue to rise. Pet owners have an obligation under our animal cruelty statute to provide necessary emergent medical care for their animals. Part of responsible pet ownership is also to provide regular wellness and preventative care. These regular veterinary visits are essential to maximizing an animal's health, longevity and quality of life. They are also expensive, and these recurring expenses can leave little financial wiggle room should disease or injury occur.

The cost of pet ownership was the number one challenge cited by O'ahu pet owners in a 2024 survey by Ward Research. A third of pet owners surveyed said they struggled to afford veterinary care. Insurance can be a comfort to pet owners facing veterinary bills and helps to ensure pets get the care they need.

We urge you to pass this measure with a good effective date to protect consumers and animals. Mahalo for your consideration.



**CRUM & FORSTER®**

A FAIRFAX COMPANY

March 9, 2025

Hawaii COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair

Re: Testimony in Support HB544 HD1/ SB1026 Relating to Pet Insurance – SUPPORT with Amendments

Dear Committee Members:

Good afternoon. My name is Caren Alvarado, and I am VP of Regulatory Affairs for Crum& Forster, a subsidiary of Fairfax Holdings. My organization has been writing pet insurance for many years, is fully licensed in all 50 states, including Hawaii, and we are therefore very familiar with the unique intricacies of these products and the marketplace. I am also Co-Chair of the Regulatory Committee for the North American Pet Health Insurance Association (NAPHIA) that is comprised of a variety of organizations involved in the pet insurance industry.

I would like to thank the members for bringing HB 544 HD1 and its companion Senate Bill SB1026 before the Committee today and for allowing interested parties the opportunity to provide testimony in support of the pet insurance legislation. We are writing in support of the revised bill as drafted

This crucial legislation builds upon existing regulatory frameworks and further promotes a framework that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market. The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly.

Specifically, the proposed legislation:

- Allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies.
- Clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law.
- Requires important consumer disclosures.



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A FAIRFAX COMPANY

- Establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance.

The legislation is aligned with the Pet Insurance Model Act adopted by adopted by the National Association of Insurance Commissioners (NAIC). The NAIC and Insurance Divisions of the various states worked collaboratively with the overall pet community, leading to the NAIC's adoption of the model. We support the bill with the proposed amendments because it is good for consumers and industry participants alike. Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

We respectfully request that you approve this important legislation with the requested amendments. On behalf of Crum & Forster, thank you for your consideration of HB 544, which will ensure the industry and consumers will benefit from a transparent framework for pet insurance.

Please let us know if you have any questions or we can provide any additional information.

Very truly yours,

Caren Alvarado, VP Regulatory Affairs & Compliance  
Crum & Forster A&H Division  
732.676.9819  
caren.alvarado@cfins.com



Aloha Senate Committee on Commerce and Consumer Protection,

I am writing on behalf of Lucky Paws Animal Foundation to express strong support for HB544, which would establish a much-needed regulatory framework for pet insurance in Hawai'i. This bill aligns with the National Association of Insurance Commissioners' Pet Insurance Model Act and ensures that pet insurance providers operate transparently and fairly.

As a pet owner, I have personally experienced the devastating consequences of misleading pet insurance policies. I purchased a plan that promised reimbursement for veterinary care, only to discover—when my dog was injured—that the coverage was restricted to a “network” of veterinarians. The problem? No veterinary clinics in Hawai'i were in their network. I had unknowingly been paying premiums for years for a policy that provided zero real protection for my pet or financial relief for me.

This is not just my experience—it happens to countless pet owners who believe they are securing their pet's health, only to be blindsided by hidden exclusions, vague policy terms, and restrictions buried in fine print.

HB544 is critical to ensuring that pet insurers are held accountable for providing clear, upfront disclosures about coverage, exclusions, waiting periods, and reimbursement limitations. This bill:

- Requires insurers to clearly disclose policy exclusions (such as preexisting conditions, hereditary disorders, and chronic conditions).
- Mandates transparent claims processing so pet owners know exactly what to expect when they file a claim.
- Establishes a 30-day “free look” period, allowing consumers to review and cancel a policy for a full refund if they are unsatisfied.
- Prohibits deceptive marketing of wellness programs as insurance, preventing consumers from being misled into believing they have coverage when they do not.
- Sets training standards for insurance producers, ensuring they are knowledgeable about pet insurance policies before selling them.

Hawai'i's pet owners deserve real protection, not fine print that leaves them vulnerable. For too long, pet insurers have been allowed to take advantage of consumers with unclear policies, hidden restrictions, and misleading marketing. HB544 would finally introduce the regulatory oversight necessary to prevent deceptive practices and ensure that pet owners can make informed decisions.

We urge this committee to pass HB544 to protect Hawai'i's pet owners from predatory insurance practices and ensure that pet insurance truly benefits the animals it is meant to cover.

Mahalo for your time and consideration.

Chris Thompson  
Lucky Paws Animal Foundation

March 12, 2025

Hawaii State House of Representatives  
Representative Scot Z. Matayoshi, Chair  
Representative Cory M. Chun, Vice Chair  
Members of the Committee on Consumer Protection & Commerce

Re: Testimony in Support HB 544 (HD 1) Relating to Pet Insurance

Dear Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today in support of HB 544 and the amendments reflected in HD 1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

My name is Shane Grosskopf and I am the Compliance and Operations Manager for Spot Pet Insurance. My organization has been writing pet insurance for many years across the country, including Hawaii, and we are very familiar with the unique intricacies of these products and the marketplace. Spot Pet Insurance is a member of the North American Pet Health Insurance Association (NAPHIA), which is comprised of a variety of organizations involved in the pet insurance industry. NAPHIA also supports the legislation.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- Allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies.
- Clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law.
- Requires important consumer disclosures.
- Establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and

ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). The NAIC and insurance departments of the various states worked collaboratively with the overall pet community, leading to the NAIC's adoption of the model. Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

We respectfully request that you approve this important legislation. Thank you for your consideration of our views.

Please let us know if you have any questions or would like further information.

Very truly yours,

Shane Grosskopf  
Spot Pet Insurance



March 12, 2025

Hawaii State House of Representatives  
Representative Scot Z. Matayoshi, Chair  
Representative Cory M. Chun, Vice Chair  
Members of the Committee on Consumer Protection & Commerce

Re: Testimony in Support HB 544 (HD 1) Relating to Pet Insurance

Dear Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today in support of HB 544 and the amendments reflected in HD 1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

My name is Sara Radak, and I am Chief of Staff for Embrace Pet Insurance. My organization has been writing pet insurance for many years across the country, including Hawaii, and we are very familiar with the unique intricacies of these products and the marketplace. Embrace Pet Insurance is a member of the North American Pet Health Insurance Association (NAPHIA), which is comprised of a variety of organizations involved in the pet insurance industry. NAPHIA also supports the legislation.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

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We respectfully request that you approve this important legislation. Thank you for your consideration of our views.

Please let us know if you have any questions or would like further information.

Very truly yours,

Sara Radak  
Chief of Staff  
Embrace Pet Insurance  
[smr@embracepetinsurance.com](mailto:smr@embracepetinsurance.com)

March 12, 2025

Hawaii State House of Representatives  
Representative Scot Z. Matayoshi, Chair  
Representative Cory M. Chun, Vice Chair  
Members of the Committee on Consumer Protection & Commerce

Re: Testimony in Support HB 544 (HD 1) Relating to Pet Insurance

Dear Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today in support of HB 544 and the amendments reflected in HD 1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

My name is Lior Keren, and I am President for Pumpkin Insurance Services Inc. My organization has been writing pet insurance for many years across the country, including Hawaii, and we are very familiar with the unique intricacies of these products and the marketplace. Pumpkin Insurance Services Inc. is a member of the North American Pet Health Insurance Association (NAPHIA), which is comprised of a variety of organizations involved in the pet insurance industry. NAPHIA also supports the legislation.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

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We respectfully request that you approve this important legislation. Thank you for your consideration of our views.

Please let us know if you have any questions or would like further information.

Very truly yours,

A handwritten signature in black ink that reads "Lior Keren". The script is cursive and fluid.

Lior Keren

President

Pumpkin Insurance Services Inc.

**HB-544-HD-1**

Submitted on: 3/8/2025 8:44:55 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By  | Organization | Testifier Position | Testify                   |
|---------------|--------------|--------------------|---------------------------|
| Frank Schultz | Individual   | Support            | Written Testimony<br>Only |

Comments:

I support this initiative.

**HB-544-HD-1**

Submitted on: 3/9/2025 5:59:13 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By | Organization | Testifier Position | Testify                   |
|--------------|--------------|--------------------|---------------------------|
| Melanie Kim  | Individual   | Support            | Written Testimony<br>Only |

Comments:

I support this bill that protects consumers by holding pet insurance providers accountable for transparent disclosure regarding their policies and coverage.

**HB-544-HD-1**

Submitted on: 3/9/2025 6:11:35 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By   | Organization | Testifier Position | Testify                |
|----------------|--------------|--------------------|------------------------|
| Lei-Anne Jones | Individual   | Support            | Written Testimony Only |

Comments:

Hello,

I am in support of HB544. We bought pet insurance through Trupanion 6 years ago and now there are more insurance provider options. It's hard to tell if you're getting a good deal with prices increasing and not knowing others with pet insurance. We recently had to use our insurance for our dog's insurance and only partial was covered. I didn't know that there were now different tiers to Trupanion's coverage and with monthly pricing increasing it would've been nice to have clearer communication if our plan changed or updates through the year if the company has different policies.

Thank you for your time and consideration of bill HB544.

Mahalo,

Lei-Anne Jones

Manoa 96822

**HB-544-HD-1**

Submitted on: 3/9/2025 8:04:18 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By         | Organization | Testifier Position | Testify                   |
|----------------------|--------------|--------------------|---------------------------|
| Stephanie McLaughlin | Individual   | Support            | Written Testimony<br>Only |

Comments:

Please pass this important bill. It will help Hawaii's animals.



**HB-544-HD-1**

Submitted on: 3/9/2025 8:44:42 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By            | Organization | Testifier Position | Testify                   |
|-------------------------|--------------|--------------------|---------------------------|
| Serena Stefanic-Phillip | Individual   | Support            | Written Testimony<br>Only |

Comments:

I am in support of Bill HB544.

**HB-544-HD-1**

Submitted on: 3/9/2025 9:20:22 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By | Organization | Testifier Position | Testify                |
|--------------|--------------|--------------------|------------------------|
| Lois Crozer  | Individual   | Support            | Written Testimony Only |

## Comments:

This bill establishes a regulatory framework specifically for pet insurance based on the National Association of Insurance Commissioners' Pet Insurance Model Act. It is a commonsense measure that protects consumers by holding pet insurance providers accountable to transparent disclosure about their policies and coverage.

I just bought pet insurance after having pets for more than 60 years, and it's not cheap. I expect it to cover what it says it will, although I have no experience with it at this point. I'm assuming the Hawaiian Humane society wants this bill passed because there have been problems securing reliable pet insurance. Many people surrender pets because they can't afford pet insurance or just don't bother to get it.

**HB-544-HD-1**

Submitted on: 3/9/2025 9:27:06 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By | Organization | Testifier Position | Testify                   |
|--------------|--------------|--------------------|---------------------------|
| Renee Rabb   | Individual   | Support            | Written Testimony<br>Only |

Comments:

Thank you for allowing me to express my support for HB544 which will establish a regulatory framework for pet insurance which protects consumers by holding pet insurance companies accountable for disclosure about their policies and coverage.

Mahalo,

Renee Rabb

Keaau, HI 96749

Big Island

**HB-544-HD-1**

Submitted on: 3/10/2025 6:18:47 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By        | Organization | Testifier Position | Testify                   |
|---------------------|--------------|--------------------|---------------------------|
| Natalie Graham-Wood | Individual   | Support            | Written Testimony<br>Only |

Comments:

I support HB544 HD1. My name is Natalie Graham-Wood and I live at Sunset Beach, Oahu.

**HB-544-HD-1**

Submitted on: 3/10/2025 9:21:12 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By   | Organization | Testifier Position | Testify                   |
|----------------|--------------|--------------------|---------------------------|
| Jennifer Chiwa | Individual   | Support            | Written Testimony<br>Only |

Comments:

Aloha Chair Senator Keohokalole, Vice Chair Senator Fukunaga and Members of the Committee on Commerce and Consumer Protection.

Please support HB 544 HD 1 to help pet owners by providing regulation for pet insurance.

Mahalo.

Jennifer Chiwa

Makiki and life long resident of Oahu

**HB-544-HD-1**

Submitted on: 3/10/2025 10:02:26 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By  | Organization | Testifier Position | Testify                |
|---------------|--------------|--------------------|------------------------|
| lynne matusow | Individual   | Support            | Written Testimony Only |

## Comments:

This bill protects consumers by holding pet insurance providers accountable to transparent disclosure about their policies and coverage.

Part of responsible pet ownership is to provide regular wellness and preventative care. These regular veterinary visits are essential to maximizing an animal's health, longevity and quality of life. They are also expensive, and these recurring expenses can leave little financial wiggle room should disease or injury occur.

For years, I was owned by a red lored amazon parrot and numerous cockatiels. It was hard finding insurance coverage. Fortunately birds require less veterinary care than cats and dogs. However, there were unexpected expense, surgery, X-rays, etc. It is important that we have reliable coverage with transparency.

**HB-544-HD-1**

Submitted on: 3/10/2025 10:18:57 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By        | Organization | Testifier Position | Testify                   |
|---------------------|--------------|--------------------|---------------------------|
| Carole R. Richelieu | Individual   | Support            | Written Testimony<br>Only |

Comments:

This is a commonsense measure that protects consumers by holding pet insurance providers accountable to transparent disclosure about their policies and coverage.

Hawaii Kai

**HB-544-HD-1**

Submitted on: 3/10/2025 5:07:48 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By     | Organization | Testifier Position | Testify                |
|------------------|--------------|--------------------|------------------------|
| Taurie Kinoshita | Individual   | Support            | Written Testimony Only |

Comments:

To the Honorable Committee,

I am writing in strong support of HB544 HD1.

This bill establishes a regulatory framework specifically for pet insurance based on the National Association of Insurance Commissioners' Pet Insurance Model Act. It is a commonsense measure that protects consumers by holding pet insurance providers accountable to transparent disclosure about their policies and coverage.

I was incredibly lucky and signed up for Trupanion when we adopted our rescue-cats. Trupanion is transparent, caring, and honest; they approach everything with integrity. This insurance company allowed me to save the life of our cats Sabina and Galahad.

Their cancer is now in remission and I have been working even harder at supporting my community and bringing joy to those around me because I feel so blessed and lucky.

By contrast, I have a family member who chose a different pet insurance company. She was unable to save the life of her beloved family dog. She is depressed all the time, bitter--a different person than she was before the illness of her pet.

She has now gone into debt, and this is bad for the economy and community--and she was still unable to save her family-member-pet.

As you know, whenever there are injustices, there can be far-reaching effects.

This bill would mitigate some of the vastly negative effects of being rendered helpless in the face of insurance-bureaucracy.

Please pass this important measure.

Thank you for your consideration.

Sincerely,

Taurie Kinoshita



lifelong resident and voter, Oahu

**HB544 Testimony from Judith Aikawa, MD, 37 Apali Way, Kula, HI 96790**

I SUPPORT bill HB544 which relates to pet insurance and establishes a regulatory framework specifically for pet insurance based on the National Association of Insurance Commissioners' Pet Insurance Model Act. It is a commonsense measure that protects consumers by holding pet insurance providers accountable to transparently disclosure their policies and coverage.

Judith Aikawa, MD, Vice-Chair  
Maui Humane Society Board of Directors

**HB-544-HD-1**

Submitted on: 3/11/2025 9:34:11 AM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By           | Organization | Testifier Position | Testify                   |
|------------------------|--------------|--------------------|---------------------------|
| Maria Virginia M Lopez | Individual   | Support            | Written Testimony<br>Only |

Comments:

I support this bill.

**HB-544-HD-1**

Submitted on: 3/11/2025 10:27:35 PM

Testimony for CPN on 3/14/2025 9:30:00 AM

| Submitted By | Organization | Testifier Position | Testify                   |
|--------------|--------------|--------------------|---------------------------|
| Ted Bohlen   | Individual   | Support            | Written Testimony<br>Only |

Comments:

SUPPORT the intent of making a comprehensive framework for pet insurance.

Hawai'i State Legislature  
Senate Committee on Commerce and Consumer Protection

March 12, 2025

*Filed via electronic testimony submission system*

**RE: HB 544, HD1, Relating to Pet Insurance – NAMIC's letter in support**

Dear Senators Keohokalole and Fukunaga and Committee Members:

Thank you for the opportunity to provide testimony in support of HB 544, HD1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

NAMIC is the largest property/casualty insurance trade association in the country, with more than 1,400 member companies representing 40 percent of the total market. NAMIC supports regional and local mutual insurance companies on main streets across America and many of the country's largest national insurers. NAMIC member companies serve more than 170 million policyholders and write nearly \$225 billion in annual premiums.

This important legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both consumers and the industry will benefit from a consistent nationwide approach for pet insurance that ensures clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies;
- clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law;
- requires important consumer disclosures; and
- establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.



The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

Thank you for your time and consideration. Please feel free to contact me at 303.907.0587 or at [crataj@namic.org](mailto:crataj@namic.org), if you would like to discuss NAMIC's written testimony.

Respectfully,

Christian John Rataj, Esq.  
NAMIC Senior Regional Vice President  
State Government Affairs, Western Region



March 14, 2025

Hawaii State Senate  
Committee on Consumer Protection & Commerce  
Honorable Jarrett Keohokalole, Chair  
Honorable Carol Fukunaga, Vice Chair

Re: Testimony in Support HB 544 Relating to Pet Insurance – SUPPORT

Dear Senators Keohokalole and Fukunaga and Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today on behalf of the North American Pet Health Insurance Association (NAPHIA) in support of HB 544. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

NAPHIA is the voice and vibrant forum for a trusted and growing pet insurance industry in the U.S. and Canada. NAPHIA members comprise the overwhelming majority of pet health insurance providers in North America. As the trade association for providers of highly valued pet health insurance related products and services, we are relied upon by pet families and veterinary teams to facilitate optimal pet healthcare and significantly improve pet health outcomes.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both consumers and the industry will benefit from a consistent nationwide approach for pet insurance that ensures clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

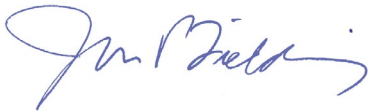
- allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies;
- clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law;
- requires important consumer disclosures; and
- establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

NAPHIA respectfully requests that you approve this important legislation. Thank you for your consideration of NAPHIA's views.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John P. Fielding". The signature is fluid and cursive, with a long horizontal stroke at the end.

John P. Fielding  
Fielding Strategies, LLC





Independence American  
Insurance Company

**LATE**

March 13, 2025

Hawaii State House of Representatives  
Representative Scot Z. Matayoshi, Chair  
Representative Cory M. Chun, Vice Chair  
Members of the Committee on Consumer Protection & Commerce

Re: Testimony in Support HB 544 (HD 1) Relating to Pet Insurance

Dear Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today in support of HB 544 and the amendments reflected in HD 1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

My name is Patricia Adams, Vice President of Insurance Compliance for Independence American Insurance Company. My organization has been writing pet insurance for many years across the country, including Hawaii, and we are very familiar with the unique intricacies of these products and the marketplace. Independence American Insurance Company is a member of the North American Pet Health Insurance Association (NAPHIA), which is comprised of a variety of organizations involved in the pet insurance industry. NAPHIA also supports the legislation.

This legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- Allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies.
- Clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law.
- Requires important consumer disclosures.



Independence American  
Insurance Company

- Establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language before you today has been vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). The NAIC and insurance departments of the various states worked collaboratively with the overall pet community, leading to the NAIC's adoption of the model. Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

We respectfully request that you approve this important legislation. Thank you for your consideration of our views.

Please let us know if you have any questions or would like further information.

Very truly yours,

Patricia Adams, VP Insurance Compliance  
Independence American Insurance Company

**LATE**

**LATE**

Honorable Jarrett Keohokalole, Chair  
Honorable Carol Fukunaga, Vice Chair  
Committee on Commerce and Consumer Protection

Friday, March 14, 2025; 9:30 AM  
Conference Room 229 & Videoconference

Re:     **HB 544 HD1 Relating to Pet Insurance – SUPPORT**

Dear Chair Keohokalole, Vice Chair Fukunaga and Committee Members:

The American Property Casualty Insurance Association (APCIA)<sup>1</sup> appreciates the opportunity support the testimony of the North American Pet Health Insurance Association (NAPHIA) in support of HB 544 HD1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both consumers and the industry will benefit from a consistent nationwide approach for pet insurance that ensures clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies;
- clarifies permissible and prohibited sales practices, and the applicability of the state’s unfair trade practices law;
- requires important consumer disclosures; and
- establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

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<sup>1</sup> The American Property Casualty Insurance Association (APCIA) is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions-protecting families, communities, and businesses in the U.S. and across the globe.

The language in HB 544 HD1 has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

APCIA respectfully requests that you approve this important legislation with the requested amendments submitted by NAPHIA. Thank you for your consideration of APCIA's views.

Sincerely,



**Mark Sektnan**

Vice President, State Government Relations (CA, HI, NV, WA)  
American Property Casualty Insurance Association (APCIA)  
[mark.sektnan@apci.org](mailto:mark.sektnan@apci.org)

March 12, 2025



Hawaii State House of Representatives  
Representative Scot Z. Matayoshi, Chair  
Representative Cory M. Chun, Vice Chair  
Members of the Committee on Consumer Protection & Commerce

Re: Testimony in Support HB 544 (HD 1) Relating to Pet Insurance

Dear Committee Members:

Good afternoon. Thank you for the opportunity to provide testimony today in support of HB 544 and the amendments reflected in HD 1. The legislation provides important protections and establishes regulatory standards that benefit consumers and provide a strong, uniform regulatory framework for insurers.

My name is Chad Bellin, and I am President for Independence Pet Group. My organization has been writing pet insurance for many years across the country, including Hawaii, and we are very familiar with the unique intricacies of these products and the marketplace. Independence Pet Group is a member of the North American Pet Health Insurance Association (NAPHIA), which is comprised of a variety of organizations involved in the pet insurance industry. NAPHIA also supports the legislation.

This crucial legislation builds upon existing regulatory frameworks and establishes specific rules for pet insurance that works for everyone – regulators, consumers, and industry players alike – promoting a clear and level playing field while promoting uniformity throughout the states. Both the industry and consumers will benefit from a consistent nationwide approach for pet insurance. By incorporating this regulatory framework into your statute, you will ensure clear and consistent regulation of pet insurance products.

Specifically, the proposed legislation:

- Allows pet products to continue to be offered in a manner that provides a seamless consumer experience and cost-saving efficiencies.
- Clarifies permissible and prohibited sales practices, and the applicability of the state's unfair trade practices law.
- Requires important consumer disclosures.
- Establishes uniform meanings of key terms for better understandability.

Consumers deserve pet insurance plans that work for them. In enacting the legislation with the revisions as proposed, the legislature will benefit consumers and empower regulators by codifying an efficient, fair, uniform, and effective regulatory framework for pet insurance. This legislation is good for all industry participants because going forward, we will have specific requirements applicable to pet insurance with which all players will have to comply, including new entrants to this growing market.

The language before you today has been thoroughly vetted at the national level to ensure the legislation creates an efficient, effective regulatory framework for pet insurance that benefits consumers, empowers regulators, and

ensures the marketplace operates fairly. The legislation is based on the Pet Insurance Model Act adopted by the National Association of Insurance Commissioners (NAIC). The NAIC and insurance departments of the various states worked collaboratively with the overall pet community, leading to the NAIC's adoption of the model. Twelve (12) states have already enacted legislation based upon this Model Act and several other states are contemplating enacting similar legislation in the coming months.

We respectfully request that you approve this important legislation. Thank you for your consideration of our views.

Please let us know if you have any questions or would like further information.

Very truly yours,

/s/ Chad Bellin