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Objection Responses	<u>KS HO3 2024-06-12 Actuarial Exhibit (1).pdf</u>

Filing at a Glance

Company:	American Strategic Insurance Corp
Product Name:	Homeowners
State:	Kansas
TOI:	04.0 Homeowners
Sub-TOI:	04.0003 Owner Occupied Homeowners
Filing Type:	Rate
Date Submitted:	02/07/2024
SERFF Tr Num:	AMSI-133804106
SERFF Status:	Closed-Approved and Filed
State Tr Num:	AMSI-133804106
State Status:	Approved and Filed
Co Tr Num:	KS HO3 2024-06
Effective Date	06/12/2024
Requested (New):	
Effective Date	08/12/2024
Requested (Renewal):	
Author(s):	Donna Hollingsworth, James Hargrove, Melanie Maynard, Heather Brackney, Bailey Ladner
Reviewer(s):	Sara Zuniga (primary)
Disposition Date:	06/07/2024
Disposition Status:	Approved and Filed
Effective Date (New):	06/19/2024
Effective Date (Renewal):	08/19/2024

General Information

Project Name: KS HO3 2024-06

Project Number:

Reference Organization:

Reference Title:

Filing Status Changed: 06/07/2024

State Status Changed: 06/07/2024

Created By: Heather Brackney

Corresponding Filing Tracking Number:

State TOI: 04.0 Homeowners

Status of Filing in Domicile: Not Filed

Domicile Status Comments:

Reference Number:

Advisory Org. Circular:

Deemer Date:

Submitted By: Melanie Maynard

State Sub-TOI: 04.0003 Owner Occupied Homeowners

Filing Description:

American Strategic Insurance Corp. (ASIC) respectfully submits for your review a revision to our Homeowners program. The effective date for new business is 6/12/2024 and renewal business will be effective 8/12/2024. Please refer to the Filing Memorandum and attached exhibits for further details. If you have any questions or comments, please do not hesitate to contact me via email jhargrove@asicorp.org.

Sincerely,

James Hargrove

Product Manager, State of Kansas

Company and Contact

Filing Contact Information

James Hargrove, Product Manager

1 ASI Way N

St. Petersburg, FL 33702

James_Hargrove@progressive.com

440-697-8612 [Phone]

Filing Company Information

American Strategic Insurance Corp

1 ASI Way

St Petersburg, FL 33702

(866) 274-8765 ext. [Phone]

CoCode: 10872

Group Code: 155

Group Name: Progressive GRP

FEIN Number: 59-3459912

State of Domicile: Florida

Company Type: P & C

State ID Number:

Filing Fees

State Fees

Fee Required?	No
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Retaliatory?	No
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Fee Explanation:

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved and Filed	Sara Zuniga	06/07/2024	06/07/2024

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved and Not Filed	Sara Zuniga	06/05/2024	06/05/2024
Disapproved and Not Filed	Sara Zuniga	05/22/2024	05/22/2024
Disapproved and Not Filed	Craig Van Aalst	05/02/2024	05/02/2024
Disapproved and Not Filed	Sara Zuniga	04/18/2024	04/18/2024
Disapproved and Not Filed	Sara Zuniga	04/18/2024	04/18/2024
Disapproved and Not Filed	Sara Zuniga	03/07/2024	03/07/2024
Disapproved and Not Filed	Sara Zuniga	02/20/2024	02/20/2024

Response Letters

Responded By	Created On	Date Submitted
Heather Brackney	06/06/2024	06/06/2024
James Hargrove	05/31/2024	05/31/2024
Heather Brackney	05/03/2024	05/03/2024
Heather Brackney	04/18/2024	04/18/2024
Heather Brackney	04/18/2024	04/18/2024
Heather Brackney	03/13/2024	03/14/2024
Heather Brackney	03/04/2024	03/04/2024

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Effective Date	Note To Filer	Sara Zuniga	06/13/2024	06/13/2024
Elevaton Dates	Note To Reviewer	Heather Brackney	06/10/2024	06/10/2024
Status	Note To Filer	Sara Zuniga	06/04/2024	06/04/2024
KS HOH Rate Revision	Note To Reviewer	James Hargrove	04/15/2024	04/15/2024

Disposition

Disposition Date: 06/07/2024
Effective Date (New): 06/19/2024
Effective Date (Renewal): 08/19/2024
- Effective Date (New) changed from 06/12/2024 to 06/19/2024 and Effective Date (Renewal) changed from 08/12/2024 to 08/19/2024 by Zuniga, Sara on 06/07/2024.
Status: Approved and Filed

Comment:

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Strategic Insurance Corp	69.700%	35.210%	\$8,867,784	11,652	\$25,182,667	106.000%	-4.840%

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate	HOH Rates Manual	Approved and Filed	Yes
Supporting Document	Explanatory Memo - Rates	Informational Only	Yes
Supporting Document (revised)	Actuarial Justification	Informational Only	Yes
Supporting Document	Actuarial Justification	Disapproved and Not Filed	Yes
Supporting Document	Actuarial Justification	Disapproved and Not Filed	Yes
Supporting Document	Exhibit of Premiums and Losses	Informational Only	Yes
Supporting Document	Previously Approved Tracking Numbers	Informational Only	Yes
Supporting Document	Rate/Rule Filing Checklist	Informational Only	Yes
Supporting Document	Forms List Template	Informational Only	Yes
Supporting Document	Redline Requirement	Informational Only	Yes
Supporting Document	Objection Responses	Informational Only	Yes

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	06/05/2024
Submitted Date	06/05/2024
Respond By Date	07/05/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

- HOH Rates Manual, null (Rate)
- Redline Requirement (Supporting Document)
- Objection Responses (Supporting Document)

Comments: We have reviewed the response to the previous letter, however, we are seeking a by peril listed in the rate sheet.

All Other Perils

Water

Wind/Hail

Earthquake

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	05/22/2024
Submitted Date	05/22/2024
Respond By Date	06/21/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

- Actuarial Justification (Supporting Document)

Comments: Please provide support and justification for each specific base rate change

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	05/02/2024
Submitted Date	05/02/2024
Respond By Date	

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

- Explanatory Memo - Rates (Supporting Document)

Comments: Please provide examples of the development of the indicated relativity, indicated change and rationale for the selected wind/hail zip code factors.

Objection 2

- Actuarial Justification (Supporting Document)

Comments: Please provide the development and justification for the base rate changes proposed for each peril. The cover letter indicates that 2017-2021 data is being used. Why isn't more current claims data being used?

Objection 3

- Actuarial Justification (Supporting Document)

Comments: Page one of the Investment Income - Profit Load Calculation appears to indicate a pre tax profit load of 15.64% and an after tax profit load of 12.36%. However, profit load in the rate indication page shows a profit load of 9%. Please clarify.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Craig Van Aalst

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	04/18/2024
Submitted Date	04/18/2024
Respond By Date	05/20/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: Please advise further if rate capping will be implemented for the rate increase, if so how much, if not why.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	04/18/2024
Submitted Date	04/18/2024
Respond By Date	05/20/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: Please provide further support and justification for the base rate revisions by peril

Objection 2

Comments: Please provide further support and justification for the base rate revisions for the revisions by zip code

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	03/07/2024
Submitted Date	03/07/2024
Respond By Date	04/08/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

Comments: Provide the algorithm that calculates the current rate and proposed rate for the policyholder receiving the 106% rate increase.

Objection 2

Comments: Clarify if a new business trend factor is being proposed and how that trend factor will be implemented/charged.

Objection 3

Comments: Provide justification for the revisions to the peril rate factor changes by peril.

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	02/20/2024
Submitted Date	02/20/2024
Respond By Date	03/20/2024

Dear James Hargrove,

Introduction:

This will acknowledge your letter whereby you submitted the captioned filing.

Objection 1

- Explanatory Memo - Rates (Supporting Document)

Comments: Please advise where Karen Clark and Company SCS model was approved for use in Kansas

Objection 2

- Actuarial Justification (Supporting Document)

Comments: Please advise further the use of different weights for each year

Objection 3

- Rate/Rule Filing Checklist (Supporting Document)

Comments: Please provide further explanation to the insured receiving the largest dollar increase and percentage

Conclusion:

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Sara Zuniga

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	06/06/2024
Submitted Date	06/06/2024

Dear Sara Zuniga,

Introduction:

Thank you for your continued review of this filing. Please see our response to your objection below.

Response 1

Comments:

We have included a separate indication including water, OP and WH all Split out. We are making no change to the Earthquake Peril. Our earthquake rates were last approved in 2023 as part of the AMSI-133527120 filing.

As said in our previous response, our water peril has only been live for a year. We have only experienced 90 losses since separating water from OP. Due to this we must use ISO as a compliment.

With our selected water rates, we are decreasing water so that our average premium for water is approximately 30% of OP. This matches our historic losses.

Related Objection 1

Applies To:

- Redline Requirement (Supporting Document)*
- HOH Rates Manual, null (Rate)*
- Objection Responses (Supporting Document)*

Comments: We have reviewed the response to the previous letter, however, we are seeking a by peril listed in the rate sheet.

All Other Perils

Water

Wind/Hail

Earthquake

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf ByPeril Indication.pdf 3 peril indication.pdf
Previous Version	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf ByPeril Indication.pdf
Previous Version	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf

Conclusion:
Thank you,
James Hargrove
Sincerely,
Heather Brackney

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/31/2024
Submitted Date	05/31/2024

Dear Sara Zuniga,

Introduction:

Hello Sara, Thank you for your review. Please review our by-peril indication to support our base rate changes.

Response 1

Comments:

We have included a by-peril indication to justify our base rate changes. We have only had one year of water premiums so we applied our water premium at a percentage of total premium relative to our prior experience of water loss. Water loss makes up approximately 30% of our losses excluding wind and hail. We have adjusted our premiums so that our average premium for water is approximately 30% of OP+Water.

Related Objection 1

Applies To:

- Actuarial Justification (Supporting Document)

Comments: Please provide support and justification for each specific base rate change

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf ByPeril Indication.pdf
Previous Version	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf

Conclusion:

Sincerely,
James Hargrove

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/03/2024
Submitted Date	05/03/2024

Dear Sara Zuniga,

Introduction:

Thank you for your continued review of this filing. Please see our responses to your objections below.

Response 1

Comments:

For the indicated relativity, we are using modeled severe convective storm loss. We place the same home in the center of each zip code and run against modeling results to get the average annual loss. This metric becomes what we utilize for our indicated relativity.

For our selected factors we are moving all factors toward the indicated relativity but applying a 25% cap so that no zip code changes by greater than 25%. We are doing this to reduce disruption in the marketplace.

Our indicated change is indicated relativity divided by our current factor.

Related Objection 1

Applies To:

- Explanatory Memo - Rates (Supporting Document)

Comments: Please provide examples of the development of the indicated relativity, indicated change and rationale for the selected wind/hail zip code factors.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

We are using data from 6/30/2019 6/30/2023 to develop our base rate changes. The 2017-2021 data referenced is only being used as a compliment for our water and other peril zip code factors. That is all we had available from ISO at that time and we are only using this as a compliment to our data that is more recent.

For Wind Hail base rate change we are using modeled loss which is outlined and on Exhibit I-6 of our Actuarial justification and then its aggregated up on Exhibit I-1. So we are applying the expected loss ratio for weather modeled losses as number 16 on Exhibit I-1. For water and other peril base rates we are using the last five years of our own experience. That is aggregated up to number 13 on Exhibit I-1. We then apply other expenses and our profit load to get our indicated rate and the select our rate change. We make all proposed factor changes that are supported in the filing. Finally, we change our base rates so that we are able to obtain the selected rate amount.

Related Objection 2

Applies To:

- Actuarial Justification (Supporting Document)

Comments: Please provide the development and justification for the base rate changes proposed for each peril. The cover letter indicates that 2017-2021 data is being used. Why isn't more current claims data being used?

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 3**Comments:**

We believe that we can justify a 13% profit load but we have experienced in KS that the most we can take is 9% based on the believe of a consulting actuary. So, we have justification for up to a 13% profit load but we are only using 9%.

Related Objection 3

Applies To:

- Actuarial Justification (Supporting Document)

Comments: Page one of the Investment Income - Profit Load Calculation appears to indicate a pre tax profit load of 15.64% and an after tax profit load of 12.36%. However, profit load in the rate indication page shows a profit load of 9%. Please clarify.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you,

*James Hargrove
Product Manager, State of Kansas*

*Sincerely,
Heather Brackney*

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/18/2024
Submitted Date	04/18/2024

Dear Sara Zuniga,

Introduction:

Thank you for your continued review of this filing. Please see our responses below to the Department's objections.

Response 1

Comments:

We are not rate capping rates with this revision. We have a large, indicated rate need and it has proven to be challenging to make a profit in the homeowners industry in recent years. We believe that making sure we get adequate rates to meet our risk exposures is important.

Related Objection 1

Comments: Please advise further if rate capping will be implemented for the rate increase, if so how much, if not why.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you,
James Hargrove
Product Manager, State of Kansas

Sincerely,
Heather Brackney

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/18/2024
Submitted Date	04/18/2024

Dear Sara Zuniga,

Introduction:

Thank you for your continued review of this filing. Please see our responses below to the Department's objections.

Response 1

Comments:

Please see our actuarial exhibits and or factor support. Our process is to first make our factor changes. Each factor change is supported in the filing. Our final step is to change our base rates to achieve the selected rate need that is supported in our actuarial exhibits. We are simply offsetting our base rates (the first component of our rate order calculation) to increase our rates overall by 35.2%. This rate need is supported in our actuarial exhibits.

Related Objection 1

Comments: Please provide further support and justification for the base rate revisions by peril

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

Our base rate process is described above. Our base rate is multiplied by our zip code factors as a step in our rate order calculation. Our zip code factors support is included in the last 33 pages of our factor support included in the filing.

Related Objection 2

Comments: Please provide further support and justification for the base rate revisions for the revisions by zip code

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you,

James Hargrove

Product Manager, State of Colorado

Sincerely,

Heather Brackney

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	03/13/2024
Submitted Date	03/14/2024

Dear Sara Zuniga,

Introduction:

Thank you for the opportunity to address the department's concerns. Please see our responses below.

Response 1

Comments:

We uploaded a current and proposed rate order calculation (algorithm) for the policy holder receiving the 106% increase. Please see the attached: Current Roc for KSA12201 and Proposed roc for KSA12201.

Related Objection 1

Comments: Provide the algorithm that calculates the current rate and proposed rate for the policyholder receiving the 106% rate increase.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection Responses
Comments:	
Attachment(s):	Current ROC for KSA12201.pdf Proposed ROC for KSA12201_.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf

Response 2

Comments:

We are not proposing a new business trend factor.

Related Objection 2

Comments: Clarify if a new business trend factor is being proposed and how that trend factor will be implemented/charged.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 3

Comments:

Please refer to the attached KS HO3 2024-06-12 Actuarial Exhibit. The process is to apply all changes to our factors, which are supported in our factor support file, and then we change our base rates peril factors to reach the selected rate change.

Related Objection 3

Comments: Provide justification for the revisions to the peril rate factor changes by peril.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection Responses
Comments:	
Attachment(s):	Current ROC for KSA12201.pdf Proposed ROC for KSA12201_.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf

Conclusion:

Thank you,

James Hargrove

Product Manager, State of Kansas

Sincerely,

Heather Brackney

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	03/04/2024
Submitted Date	03/04/2024

Dear Sara Zuniga,

Introduction:

Thank you for the opportunity to address the department's concerns. Please see our responses below.

Response 1

Comments:

We have not changed our usage of the Karen Clark and Company SCS model in this revision. In previous revisions we have abbreviated it as KCC, but it was used as actuarial support in our last revision (AMSI-133527120.) Looking back in time into previous revisions, it looks like it was originally approved by the Kansas Department on 05/07/2020. The SERFF number for this filing is AMSI-132181891.

Related Objection 1

Applies To:

- Explanatory Memo - Rates (Supporting Document)

Comments: Please advise where Karen Clark and Company SCS model was approved for use in Kansas

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

Please refer to Exhibit I-1 in our Actuarial Justification. This is on the first page. Our weighting can be seen on row 1 and row 12. We are weighting the years based on our experience in that year. We are using Earned Exposures or Earned House Years as the measure for our experience.

Related Objection 2

Applies To:

- Actuarial Justification (Supporting Document)

Comments: Please advise further the use of different weights for each year

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 3

Comments:

In addition to the characteristics previously provided, the insured with the highest dollar increase also has a finished basement, frame construction type, composite shingles, and Replacement Cost for Wind/Hail Loss Settlement to Roofs.

Related Objection 3

Applies To:

- Rate/Rule Filing Checklist (Supporting Document)*

Comments: Please provide further explanation to the insured receiving the largest dollar increase and percentage

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you,

James Hargrove

Product Manager, State of Kansas

Sincerely,

Heather Brackney

Note To Filer

Created By:

Sara Zuniga on 06/13/2024 08:22 AM

Last Edited By:

Sara Zuniga

Submitted On:

06/13/2024 08:22 AM

Subject:

Effective Date

Comments:

Hello

The effective date on the disposition already reads the requested.

Note To Reviewer

Created By:

Heather Brackney on 06/10/2024 06:22 AM

Last Edited By:

Heather Brackney

Submitted On:

06/10/2024 06:23 AM

Subject:

Elevaton Dates

Comments:

Hello Sara,

Can we please update the new business elevation date to 6/19/2024 and the Renewal elevation date to 8/19/2024?

Thank you so much for all your help.

Jay

Note To Filer

Created By:

Sara Zuniga on 06/04/2024 03:36 PM

Last Edited By:

Sara Zuniga

Submitted On:

06/04/2024 03:36 PM

Subject:

Status

Comments:

Hello!

I just spoke with my assistant director and he is currently reviewing the filing. We should have something shortly.

Thank you

Note To Reviewer

Created By:

James Hargrove on 04/15/2024 11:13 AM

Last Edited By:

James Hargrove

Submitted On:

04/15/2024 11:13 AM

Subject:

KS HOH Rate Revision

Comments:

Hello Sara,

I hope all is well and you had a fantastic weekend. I am sending this note to see if you have any updates on this filing. We generally want to have the state's approval prior to beginning our IT programming process.

Thank you,

Jay Hargrove

Rate Information

Rate data applies to filing.

Filing Method:	Prior Approval
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	12.500%
Effective Date of Last Rate Revision:	06/02/2023
Filing Method of Last Filing:	Prior Approval
SERFF Tracking Number of Last Filing:	AMSI-133527120

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Strategic Insurance Corp	69.700%	35.210%	\$8,867,784	11,652	\$25,182,667	106.000%	-4.840%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	Approved and Filed 06/07/2024	HOH Rates Manual		Replacement	AMSI-133527120	KS HO3 2024-06-12 Rate Factor Pages.pdf

Supporting Document Schedules

Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS HOH Rates Filing Memo.pdf
Item Status:	Informational Only
Status Date:	06/07/2024

Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf ByPeril Indication.pdf 3 peril indication.pdf
Item Status:	Informational Only
Status Date:	06/07/2024

Satisfied - Item:	Exhibit of Premiums and Losses
Comments:	
Attachment(s):	KS HOH 2024-06-12 Premium and Losses Exhibit.pdf
Item Status:	Informational Only
Status Date:	06/07/2024

Satisfied - Item:	Previously Approved Tracking Numbers
Comments:	Most recent Rule filing SERFF number:AMSI-133527120 Most recent Rate filing SERFF number: AMSI-133527120
Attachment(s):	
Item Status:	Informational Only
Status Date:	06/07/2024

Satisfied - Item:	Rate/Rule Filing Checklist
Comments:	TBD

Attachment(s):	Kansas Rate Rule Filing Checklist.pdf KS P&C Checklist Final .xlsm KS Permissible LR.pdf KS HO3 2024-06-12 Uncapped Histogram.pdf KS HO3 2024-06-12 Characteristics of Maximum Increase Exhibit.pdf Rate Filing Talking Points.pdf Board Member Certification.pdf KS HO3 2024-06-12 AVG Max Min.pdf
Item Status:	Informational Only
Status Date:	06/07/2024
Bypassed - Item:	Forms List Template
Bypass Reason:	NA
Attachment(s):	
Item Status:	Informational Only
Status Date:	06/07/2024
Satisfied - Item:	Redline Requirement
Comments:	
Attachment(s):	KS HO3 2024-06-12 Marked Rate Factor Pages - Changes only.pdf KS HO3 2024-06-12 ROC.pdf
Item Status:	Informational Only
Status Date:	06/07/2024
Satisfied - Item:	Objection Responses
Comments:	
Attachment(s):	Current ROC for KSA12201.pdf Proposed ROC for KSA12201_.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf
Item Status:	Informational Only
Status Date:	06/07/2024

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
05/31/2024	Disapproved and Not Filed 06/07/2024	Supporting Document	Actuarial Justification	06/06/2024	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf ByPeril Indication.pdf
09/05/2023	Disapproved and Not Filed 06/07/2024	Supporting Document	Actuarial Justification	05/31/2024	Factor Support.pdf KS HO3 2024-06-12 Actuarial Exhibit.pdf