



## Citizens 2019 Rates

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1. **Why will most Citizens policyholders see additional rate increases when Florida has weathered only two storms in the past decade?**

Skyrocketing nonweather water losses in Miami-Dade, Broward and Palm Beach Counties have eroded financial progress made following more than a decade without a hurricane. Given the latest data, rates in those counties would have to nearly triple to pay for nonweather related water losses and the litigation expenses that often accompany these claims. Water losses also threaten to increase rates in other regions of the state.

While rates for many policy types and areas have been approaching actuarial soundness over the past few years, this recent surge in claims related to nonweather water losses in South Florida has increased Citizens' net claims payments and litigation expense costs. These losses are significant enough to offset previous progress made toward rate adequacy and the decreased cost of reinsurance and other risk transfer products, resulting in the need for a corresponding rate increase.

Citizens is required by law to recommend actuarially sound rates within the limits of the Legislatively created glide path, which limits rate increases to no more than 10 percent per year. The Office of Insurance Regulation uses these recommendations to set Citizens rates.

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## **2. Are Floridians more at risk of assessments as a result of Citizens increased rate need?**

More affordable reinsurance and the success of Citizens' depopulation efforts over the past several years have allowed Citizens to boost its claims paying ability significantly. For the first time since its creation, Citizens can now handle a 1-in-100 year storm followed by a 1-in-41 year event without having to levy assessments on Florida policyholders.

While Citizens' surplus remains significant, Citizens has a duty to its policyholders and all Floridians to protect them from the increased risk of assessments that will arise from continued unchecked nonweather water losses. This includes enacting policy changes aimed at stemming these losses and raising rates in accordance with the statutorily mandated glide path to cover the increased risk of these losses.

Even with actuarially sound rates and a responsible reinsurance strategy, however, a major storm or series of storms that exhausts Citizens' reinsurance and surplus could make assessments necessary.

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## **3. What is Assignment of Benefits and how is it affecting 2019 rates?**

Assignment of benefits (AOB) is a contract between an insurance policyholder and a third party, such as a roofer or a water remediation vendor. An AOB transfers control of the claim benefits and other policy rights and provisions to a third party. This includes all responsibility for dealing with the insurance company to evaluate damages, file a policyholder's claim, settle the claim and receive payment.

Nonweather water loss claims submitted with an AOB cost on average of three times more than claims without an AOB and are more frequently litigated. AOB claims also are ripe for abuse as Citizens often is not given the opportunity to inspect the damages or approve permanent repairs before they are completed.

Instances of AOB abuse are on the rise, particularly in South Florida, and are one of the major factors driving increased nonweather water losses and Citizens' increased rate need. Homeowners frequently are told during an emergency service call that the only way repairs can begin is by signing an AOB. In these situations, the contractor may begin permanent repairs before notifying Citizens of the loss and may even inflate the severity of the loss, with or without the policyholder's consent.

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## **4. Are water losses and AOB abuses limited to South Florida? Is it spreading to other parts of the state?**

As of June 2017, 83 percent of claims submitted to Citizens that resulted in litigation had legal or AOB representation before the claim was even reported to Citizens. Nearly 94 percent of those cases originate in Miami-Dade, Broward and Palm Beach counties. Although water losses and AOB abuses remain concentrated in South Florida, the trend

is spreading to other parts of the state, where AOB representation at first notice of loss has nearly tripled.

Claims reported with AOB representation cost more than double than nonrepresented claims to resolve. This cost increases to nearly five times if the case requires litigation.

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## 5. What is Citizens doing to address water losses and AOB abuse?

Last year, the Florida Office of Insurance Regulation approved a set of focused [policy changes](#) for Citizens regarding loss reporting, including the establishment of a threshold for nonapproved emergency services and the opportunity to inspect the property prior to permanent repairs being completed. Citizens must respond with 48 hours if contacted by a policyholder requesting approval for additional emergency services above the threshold.

Policyholders are required to allow Citizens to inspect the damage within 72 hours of a loss being reported and as often as Citizens reasonably requires. Failure to do so may result in loss of coverage for permanent repairs. If Citizens does not reasonably attempt to conduct an inspection or provide approval within 72 hours the loss being reported, the policyholder can authorize or begin permanent repairs covered under the policy.

Another option for eligible policyholders is the Citizens [Managed Repair Program](#) which includes two voluntary services to help customers recover when their home is damaged from water damage not caused by weather. The Emergency Water Removal Services Program offers **free** water removal and drying services following eligible water losses not caused by weather. Citizens also offers a Managed Repair Contractor Network to connect customers connected with a network of approved contractors who can make permanent repairs for covered damages.

Effective August 1, 2018, if a customer opts to use a contractor outside the Managed Repair Contractor Network, there is a \$10,000 limit on covered damage resulting from water losses not caused by weather. This limit includes up to \$3,000 for emergency water removal services. Customers who do use Citizens' Managed Repair Program would not be subject to the sublimit.

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## 6. What would happen to rates if the AOB and water litigation problems were resolved?

Resolving the AOB and water litigation problems may contribute to a decrease of litigation rates, which would in turn reduce the statewide rate indication. Citizens expects a litigation rate of nearly 50 percent of all water claims versus previous levels of 10 to 12 percent. Returning to previous litigation levels would drop the statewide rate indication from 26 percent to around 1 percent. South Florida would have a zero percent overall rate indication and the rest of the state having a 2.9 percent rate indication. This reduction in rate indication would result in a rate decrease for more than half of South Florida policyholders and about a third of customers in the rest of the state.

Citizens' Managed Repair Program offers valuable services to qualified HO-3 and DP-3 customers whose homes have been damaged. Emergency Water Removal Services provides water removal services to protect a policyholder's home from further damage caused by a nonweather water loss. The Managed Repair Contractor Network Program provides permanent repair services to return the customer's home to its pre-loss condition following a qualified loss. Permanent repairs include flooring, insulation-drywall-paint, and cabinetry.

Citizens continues to educate its customers about AOB abuse and common scenarios where AOB-related fraud can occur such as offers for repairs for damage you were unaware of, a proposal of "*something for nothing*," such as a free roof or large insurance payouts, or pressure to sign a contract they don't fully understand.

## 7. How can policyholders' actions after a loss affect rates?

The most important action policyholders can take to remain in the driver's seat on their claim is to [Call Citizens First](#), either by contacting their agent, submitting a claim online through myPolicy or by calling Citizens' 24/7 toll-free claims hotline at **866.411.2742**.

Immediately calling Citizens as soon as they suspect damage to their property will allow Citizens to help policyholders resolve their claim and repair any covered damage in the most efficient and cost effective manner possible.

Citizens also advises our customers to be wary of unsolicited vendors canvassing their neighborhood offering something for nothing, such as a free roof or large insurance payouts. Finally, never sign a contract you don't fully understand.

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# ACTION ITEM

A&U Committee Meeting, June 19, 2018  
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<b>CONTRACT ID:</b>	<b>ANNUAL RECOMMENDED 2019 RATE FILINGS – EFFECTIVE FEBRUARY 1, 2019</b>
<b>BUDGETED ITEM</b>	N/A
<b>CONTRACT AMOUNT</b>	N/A
<b>PURPOSE / SCOPE</b>	<p><b>Purpose:</b></p> <p>As required by statute, Citizens has completed the annual analysis of recommended rates for 2019. The purpose of this item is to receive approval from the Board to file these recommended rates with the Florida Office of Insurance Regulation.</p> <p><b>Scope:</b></p> <p>The presented recommended rate changes include all policy types for manually rated personal and commercial lines of business. These recommended rate changes:</p> <ul style="list-style-type: none"><li>• Comply with the requirement in Florida law that Citizens recommend actuarially sound rates</li><li>• Are not excessive, inadequate or unfairly discriminatory, and meet the requirements of U.S. Actuarial Standards of Practice except where Florida law supersedes such standards</li><li>• Comply with the statutory “glide path”</li><li>• Considers the Florida Public Hurricane Model, as required by law</li><li>• Include an appropriate charge to pass through the Florida Hurricane Catastrophe Fund Rapid Cash build-up</li></ul> <p>For personal lines, the overall statewide indicated rate change is 26.5%. After the application of the glide-path capping, the recommended rate impact is 7.9%.</p> <p>For commercial lines, the overall statewide indicated rate change is 54.6%. After the application of the glide-path capping, the recommended rate impact is 8.9%</p>
<b>CONTRACT TERM(S)</b>	N/A
<b>PROCUREMENT METHOD</b>	N/A
<b>RECOMMENDATION</b>	<p>Citizens’ staff recommends that the Actuarial and Underwriting Committee:</p> <ol style="list-style-type: none"><li>a) Approve the Annual Recommended 2019 Rate Filings; and</li><li>b) Upon approval, the presented rate changes will be filed with the Office of Insurance Regulation.</li></ol>
<b>CONTACTS</b>	Brian Donovan, Sr Director, Chief Actuary

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## Annual Recommended 2019 Rate Filings

As required by statute, Citizens has completed the annual analysis of recommended rates for 2019. The Office of Insurance Regulation uses this information as it establishes Citizens rates to be implemented for policy effective dates beginning February 2019. The analysis developed rate indications that:

- Comply with the requirement in Florida law that Citizens recommend actuarially sound rates. The indications developed are designed to generate the premium needed to cover Citizens' projected losses and expenses during the effective period of the rates.
- Are not excessive, inadequate or unfairly discriminatory, and meet the requirements of U.S. Actuarial Standards of Practice except where Florida law supersedes such standards.
- Comply with the statutory "glide path" that limits Citizens annual rate increases to no more than 10% for any single policy issued. This is an exception to the requirement for actuarially sound rates. It applies to non-sinkhole perils, and excludes coverage changes and surcharges.
- Considers the Florida Public Hurricane Model (FPM) results in wind rate recommendations, as required by law. Law changes in 2016 removed the requirement that the FPM results be the "minimum benchmark" for those rates.
- Include an appropriate charge to pass through the Florida Hurricane Catastrophe Fund (FHCF) Rapid Cash Build-Up Factor, as required by law.

Major cost factors in the rate analysis include:

- i) Non-catastrophic losses and loss adjustment expenses (LAE)
- ii) Modeled catastrophic hurricane losses and estimated LAE
- iii) Administrative expenses
- iv) Risk transfer costs
- v) Pre-event liquidity costs

The average statewide indicated rate change over all personal lines of business is +26.5%. The premium impact after the application of the glide path cap is 7.9%. Note that each Citizens policyholder pays a premium for an individual policy line that is based on their risk classification; nobody pays exactly the average. The indications vary greatly by account and by product line. See Exhibit 1 for more detail.

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The average statewide indicated rate change over all commercial lines of business is +54.6%. The premium impact after the application of the glide path cap is +8.9%. These results also vary widely by product line. See Exhibit 1 for more detail.

When underlying costs are rising rapidly, the difference between indicated revenue need and actual premium impact may be significant. Due to the glide path, cost trends may outstrip the ability of Citizens to obtain sound premiums, even if base rates are sound.

## **Determination of Overall Rate Indications by Line of Business**

### Water Peril

The peril of non-weather water continues to be the primary driver of Citizens' increased rate need. In particular, litigated water claims in South East Florida (Miami-Dade, Broward, and Palm Beach counties) are driving the water indication. Before consideration of the Managed Repair Program and the \$10K sublimit on water claims, the expectation is that 50% of all water claims in 2019 will end up in litigation. Litigated claims cost are roughly five times as more expensive to settle than non-litigated claims (\$6K to \$7K versus \$30K to \$35K). In 2017, South East Florida, while accounting for 57% of HO-3 exposure, accounted for 94% of all litigated claims.

Effective 8/1/2018, changes to Citizens' policies will become effective that address the costs of unsustainable levels of litigation, and the rate increases that they create for policyholders. At the time of a water loss, a policyholder will have the option to enter Citizens' Managed Repair Program. Policyholders who do not use the program will have their water losses subjected to a \$10,000 sublimit. Policyholders who do use Citizens' Managed Repair Program would not be subject to any sublimit. The rate indication explicitly contemplates the effect of this new program. It is expected to reduce litigation, which lowers the water rate need by 37%. Without the new program, the statewide water indication would be 47.6%. Instead, the proposed rates include an adjusted water indication of 33.4%.

### Hurricane Peril

Hurricane peril rates drive the overall Citizens premium for many policyholders, particularly in coastal territories. As Florida law requires, projected hurricane losses from accepted scientific simulation models were considered. Citizens used four models accepted by the Florida Commission on Hurricane Loss Projection Methodology: AIR (v16.0.0, Touchstone 5.0.0), RMS (Risklink v17.0), CoreLogic RQE (Florida Hurricane Model v2017a), and the FPM (v6.2). No model results were modified or adjusted. The four distinct models underpinned a range of rate indications for each line of business. These ranges varied by line of business, as models may disagree widely in some territories and products.

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When determining the selected statewide indication, greatest consideration was given to the median of the four models. This statewide indication must then be allocated to each territory. To allocate the statewide indication, we relied on the median of the four models on the territory level. This is consistent with the approach that was introduced with last year's rate filing. We view this approach as appropriate because it provides a statistically sound method for recognizing the range of model results in every territory while also minimizing the effect of outliers.

**Exhibit 1- Summary of Statewide Rate Indications** displays results for each product line. The **Uncapped Indication** is the selected statewide indication adjusted for the FHCF pass-through. The **Proposed Change** columns represent the actual premium impact to consumers after the application of the glide path cap to each single policy. At the policy level, all premium changes are limited to +/- 10% (except for HO-4 which is limited to +10%/-15%, in accordance with previous OIR guidance). After the application of the cap, the impact of the FHCF pass-through is added.

## Impact of Private Reinsurance Costs

Due to significant depopulation and continued low "rates-on-line" (unit costs) for private reinsurance, Citizens was, once again, able to transfer the majority of its hurricane risk away from Florida policyholders (including non-Citizens policyholders, who would pay emergency assessments if storms caused significant deficits). For the fourth year in a row, Citizens can sustain a so-called "1-in-100 year" storm, meaning a storm with a 1% chance of occurring in any given year, in the Coastal Account without triggering assessments. Because Citizens is only exposing 34% (down from 50% from 2017) of its Coastal surplus to such a storm, it can also sustain a 1-in-41 year storm following a 1-in-100 year event.

Last year, Citizens transferred \$1.33 billion of Coastal Account risk to private reinsurers at a net cost of \$56 million. This year, Citizens transferred \$1.42 billion of Coastal Account risk to the private sector at an estimated net cost of \$55 million. "Net cost" refers to the gross expenditure on risk transfer less the expected hurricane losses that would be subject to the agreements. Last year's Homeowners indication included a provision of 5.5% for the cost of private reinsurance. This year the provision is 5.6%, meaning that 5.6 cents of the premium dollar is devoted to private reinsurance.

Private reinsurance covers policies in the Coastal account only, but it does lower the probability that policyholders in the Personal Lines Account (PLA) and Commercial Lines Account (CLA) will face a surcharge due to deficits in the Coastal Account. Consequently, a small portion of private reinsurance costs are allocated to the policies in the PLA and CLA. The rate indications allocate 90% of the private reinsurance costs to the Coastal Account and 10% to the PLA/CLA.

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Note that public reinsurance from the mandatory participation in the FHCF is divided into a PLA+CLA contract and a separate Coastal contract, the net costs of which are allocated to policies in the respective accounts.

## Impact of Pre-Event Liquidity

Pre-event liquidity (debt financing) provides a funding bridge to the point in time and loss levels at which the FHCF begins to pay hurricane reimbursements. It also ensures quick claims-paying capacity for subsequent storms in a season and augments other Citizens claims-paying resources that are not readily available in cash after a storm. This allows for timely payment of claims as well as flexibility in the timing and cost of issuance of post-event debt.

Pre-event debt does impact the cost structure of Citizens, and therefore the rate indications. The impact in Homeowners to the statewide uncapped rate indication is +2.6%.

## Impact of Policy Level Capping

Due to the interaction of all actuarial considerations, rate indications vary greatly from policy to policy within Citizens. Large increases as well as large decreases are indicated for various consumers. The glide path established in 2010 requires Citizens to ensure no single policyholder shall be subject to a (non-sinkhole) rate increase greater than 10%. In order to balance the statutory requirements of actuarial soundness and the glide path, it is recommended that all rate increases be capped at +10%, and all rate decreases at -10%, except for HO-4 forms as noted above.

## Impact of FHCF Buildup Premium

The FHCF is required by law to include a “rapid cash buildup factor” of 25% in its premium. Citizens, in turn, is required by law to pass this cost to the policyholder, outside the 10% glide path cap. This results in higher rate indications and affects the statewide premium impacts as well, raising some lines slightly above 10%.

## Sinkhole Indications

The number of reported sinkhole claims to Citizens has been steadily declining since the end of 2011. In 2011, over 4,500 claims were reported. By 2013 the number was reduced to around 1,200 and has declined further since then, attributable largely to the impact of Senate Bill 408, the major sinkhole claims reform enacted in 2011. While all signs at this point are that SB408 has successfully addressed sinkhole trends, there does remain uncertainty about the final outcome of many pending claims, some litigated. Staff recommends that for a fifth straight year, sinkhole rates remain unchanged. As the ultimate effect of law changes emerges in the claims experience, there is no guarantee that future sinkhole rate increases will not be necessary.

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## Monroe County

In the rate order issued regarding the personal lines 2018 rates (Order # 211627-17), the OIR held Monroe rates' at the 2017 levels and directed Citizens to complete the following analyses:

1. **An evaluation and study of appropriate rating territories for Monroe County for wind-only and multi-peril policies**

### Results

We have investigated the effects of segmenting Monroe into three separate geographical territories: the upper, middle and lower keys. The models suggest that rates on policies written in the lower keys are not as inadequate as in the middle and upper keys. Due to the 10% glide path, any impact of segmenting territories will be muted in 2019. But eventually, policyholders in the upper and middle keys would pay more premium, which would allow policyholders in the lower keys to pay less.

While staff will continue to monitor this option, we recommend continuing to use only one Monroe rating territory in 2019, for these reasons:

- a) Increased uncertainty with more granularity

As required by statute, we calculate the indicated wind premium using modeled hurricane losses from approved models. There is uncertainty in any model results, which is why we consider the results of four models. Segmenting the Monroe territory means asking the models for more granular precision when there is a lack of actual historical hurricane data for this area. This will only increase the uncertainty of the model results.

- b) Fairness

Whether to segment the Monroe into more granular territories is a decision that requires careful deliberation. It would lead to higher uncapped indications for some policyholders, and also creates internal costs to implement the new territories. All segments of Monroe have uncapped indications in excess of 20%. The recommended homeowner rate change with this filing is 7.8%. Keeping a single territory for now allows for a more careful decision. In particular, it may allow the models to incorporate the results from Hurricane Irma. Since Irma did impact the Keys, this may be an important data point for calibrating models.

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2. **Review the study of Applied Research Associates, Inc. which evaluated the effectiveness of Plywood (Class C) shutters, for consideration by Citizens to provide a credit for this wind mitigation feature**

## Results

We have conducted a detailed review of the 2003 Applied Research Associate, Inc., (ARA) study referenced by the order. We do not recommend that Citizens provide credit for this wind mitigation feature, for reasons explained below.

- a) Plywood shutters cannot be verified

Because plywood shutters must be manually installed by policyholders as a storm approaches, their use cannot be verified when a policy is written. This makes them unsuitable for a premium credit under actuarial standards of practice.

- b) Practical concerns

Even if an insured purchases plywood shutters, ARA points out that their effectiveness depends upon several factors. For example, they must be new and not warped. As they age, stored plywood shutters can warp, especially if they are deployed at some point, get wet, and are stored again. Also, the nail holes used to install the shutters must be "virgin". That is, each time shutters are deployed, new nail holes must be used. Finally, ARA found that even under ideal conditions, the plywood shutters were expected to fail at wind speeds over 130. Monroe is rated as a 180 wind zone.

- c) Would need to be offered statewide

In order not to be unfairly discriminatory, the new credit could not be offered only in Monroe County. It would need to be offered statewide. Implementing the new credits would create new costs. Finally, there might be unintended consequences. In particular, making the credit consistent with other mitigation credits offered by Citizens, and with current hurricane models (the ARA study was published in 2003), might require updating all the mitigation credits offered by Citizens.

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3. **Collaborate with Monroe County on the completion of its detailed study to evaluate the effect of building code standards in Monroe County and the impact of those standards on wind mitigation credits**

## Results

Citizens did this. Staff collaborated with FIRM on their study by providing policy data, and by analyzing FIRM's survey results using the AIR hurricane model. That study is now complete

4. **An evaluation and study of the models accepted by the Florida Commission on Hurricane Loss Projection Methodology using the 2017 standards, which includes the requirement that county building codes be reflected in the model results**

## Results

Citizens cannot complete this task until models approved for us in 2019 are available. This is because the standards set in 2017 apply to models that are not approved and available for use until 2019. We cannot use current models instead because, prior to 2017, the standards did not require that county building codes be reflected in the model results.

## **Rate Analysis Exhibits**

Several Exhibits are included with this item. Note that scale differs on some maps, so review the legends carefully when comparing maps. Also, all premium totals are based on policies in-force as of 12/31/2017.

### **Exhibit 1: Summary of Statewide Indications**

- Columns (1) through (3) display the statewide uncapped indication and the proposed capped rate impact for multi-peril lines of business in the Personal Lines Account.
- Columns (4) through (6) display the statewide uncapped indication and the proposed capped rate impact for multi-peril lines of business in the Coastal Account.
- Columns (7) through (9) display the statewide uncapped indication and the proposed capped rate impact for wind-only lines of business (written only in the Coastal Account).
- Columns (10) through (12) display the statewide uncapped indication and the proposed capped rate impact for combined multi-peril and wind-only lines of business.

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## **Exhibit 2 – Multi-Peril HO-3 (Homeowners) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 3 – Wind-Only HW-2 (Homeowners) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 4 – Multi-Peril HO-6 (Condo Unit-Owners) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 5 – Wind-Only HW-6 (Condo Unit-Owners) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 6 – Multi-Peril DP-1 and DP-3 (Dwelling Fire) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

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## **Exhibit 7 – Wind-Only DW-2 (Dwelling Fire) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 8 – Multi-Peril MHO-3 and MDP-1 (Mobile Homeowners and Dwelling Fire) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 9 – Wind-Only MW-2 and MD-1 (Mobile Homeowners and Dwelling Fire) County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county
- Note that the numbers in this exhibit show the average premium impact for the county
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 10 - Multi-Peril Commercial Residential County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each of the “Group 2” perils territories (some of which cross several counties)
- Note that the numbers in this exhibit show the average premium impact for the territory.
- The actual premium impact can vary between -10% and +10% for individual policyholders within each county

## **Exhibit 11 - Wind-Only Commercial Residential County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county

## **Exhibit 12 - Multi-Peril Commercial Non-Residential County Average Premium Impacts Map**

- Displays the proposed premium impact after capping for each Group 2 territory

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- The numbers display the expected premium impact for each policyholder within a territory.

## **Exhibit 13 - Wind-Only Commercial Non-Residential County Average Premium Impacts Map**

- Displays the average proposed premium impact after capping for each county

## **Exhibit 14 - Distribution of Recommended Rate Impacts by Policy in PLA**

- Tabulates the proposed capped premium impacts for personal lines into a histogram showing number and proportion of policyholders in each impact range
- Includes all personal lines combined
- Range exceeds +/- 10% slightly, due to the impact of the FHCF pass through

## **Exhibit 15 - Distribution of Recommended Rate Impacts by Policy in Coastal Account**

- Tabulates the proposed capped premium impact for personal lines into a histogram showing number and proportion of policyholders in each impact range
- Includes all personal lines combined
- Range exceeds +/- 10% slightly, due to the impact of the FHCF pass through

## **Exhibit 16 – Average Premium by County – HO-3**

- Current and proposed average premium by county for multi-peril Homeowners policies
- Based on in-force policies as of 12-31-2017

## **Exhibit 17 – Average Premium by County – HW-2**

- Current and proposed average premium by county for wind-only Homeowners policies
- Based on in-force policies as of 12-31-2017

## **Exhibit 18 – Average Premium by County – HO-6**

- Current and proposed average premium by county for multi-peril Condo Unit policies
- Based on in-force policies as of 12-31-2017

## **Exhibit 19 – Average Premium by County – HW-6**

- Current and proposed average premium by county for multi-peril Condo Unit policies
- Based on in-force policies as of 12-31-2017

## Exhibit 1 - Summary of Statewide Indications using the OIR Promulgated Contingency Provisions

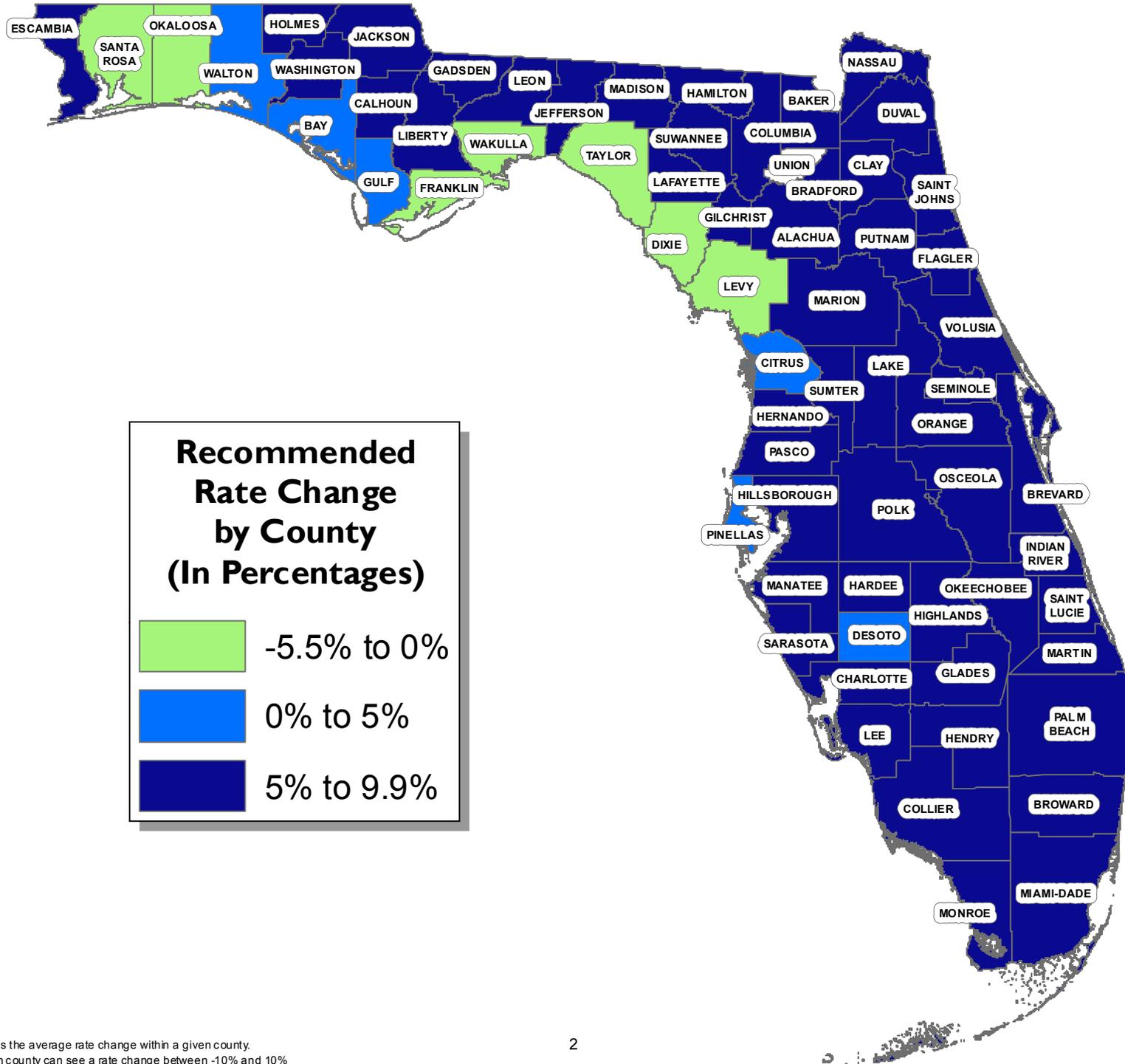
	(1) Personal Lines Multi-Peril			(4) Coastal Multiperil				(7) Wind-Only				(10) Total			
	(1) In-Force Premium	(2) Uncapped Indication	(3) Proposed Change	(4) In-Force Premium	(5) Uncapped Indication	(6) Proposed Change		(7) In-Force Premium	(8) Uncapped Indication	(9) Proposed Change		(10) In-Force Premium	(11) Uncapped Indication	(12) Proposed Change	
<u>Product Line - Personal</u>															
Homeowners	327,040,148	25.0%	8.3%	74,096,719	35.8%	9.5%	100,159,946	22.4%	7.9%	501,296,813	26.1%	8.4%			
Renters	778,623	-23.6%	-13.3%	764,240	-7.7%	-5.7%	166,918	2.9%	3.5%	1,709,781	-13.8%	-8.2%			
Condo Units	14,485,584	26.4%	8.7%	14,275,667	27.5%	7.1%	12,363,268	34.5%	7.2%	41,124,519	29.3%	7.7%			
Dwelling - DP3	89,667,476	32.1%	7.4%	32,659,447	38.0%	8.7%	24,923,492	29.9%	7.7%	147,250,415	33.0%	7.8%			
Dwelling - DP1	17,492,493	8.3%	4.6%	7,352,589	25.3%	7.9%	n/a	n/a	n/a	24,845,082	13.4%	5.6%			
Mobile Homeowners	20,482,789	4.0%	2.6%	2,708,436	21.6%	6.2%	3,333,031	32.2%	9.8%	26,524,256	9.4%	3.8%			
<u>Dwelling Mobile Home</u>	<u>12,418,307</u>	<u>19.8%</u>	<u>9.3%</u>	<u>1,323,709</u>	<u>46.6%</u>	<u>9.4%</u>	<u>353,630</u>	<u>45.8%</u>	<u>9.7%</u>	<u>14,095,646</u>	<u>23.0%</u>	<u>9.3%</u>			
Total Personal Lines	482,365,420	24.7%	7.7%	133,180,807	34.5%	8.8%	141,300,285	25.1%	7.8%	756,846,512	26.5%	7.9%			
<u>Product Line - Commercial</u>															
Commercial Residential	22,221,336	36.7%	5.3%				33,114,809	98.6%	10.2%	55,336,146	73.7%	8.2%			
<u>Commercial Non-Residential</u>	<u>2,286,477</u>	<u>10.0%</u>	<u>9.2%</u>				<u>38,967,769</u>	<u>30.0%</u>	<u>9.9%</u>	<u>41,254,246</u>	<u>28.9%</u>	<u>9.9%</u>			
Total Commercial Lines	24,507,813	34.2%	5.7%				72,082,578	61.5%	10.0%	96,590,391	54.6%	8.9%			
<u>Product Line</u>															
Personal	615,546,227	26.8%	8.0%				141,300,285	25.1%	7.8%	756,846,512	26.5%	7.9%			
<u>Commercial</u>	<u>24,507,813</u>	<u>34.2%</u>	<u>5.7%</u>				<u>72,082,578</u>	<u>61.5%</u>	<u>10.0%</u>	<u>96,590,391</u>	<u>54.6%</u>	<u>8.9%</u>			
Total	640,054,040	27.1%	7.9%				213,382,864	37.4%	8.6%	853,436,904	29.6%	8.0%			

**Notes:**

- (1), (4), (7) In-Force Premium at Current Rate Level
- (2), (5), (8) Uncapped Rate Indications (includes FHCF Build Up Premium).
- (3), (6), (9) Premium Impact after Capping (includes FHCF Build Up Premium).
- (10) = (1) + (4) + (7)
- (11) = [ (1)\*(2) + (4)\*(5) + (7)\*(8) ] / (10)
- (12) = [ (1)\*(3) + (4)\*(6) + (7)\*(9) ] / (10)

# Exhibit 2 - Percent of Recommended Rate Change by County

Multi-Peril HO3 Policies

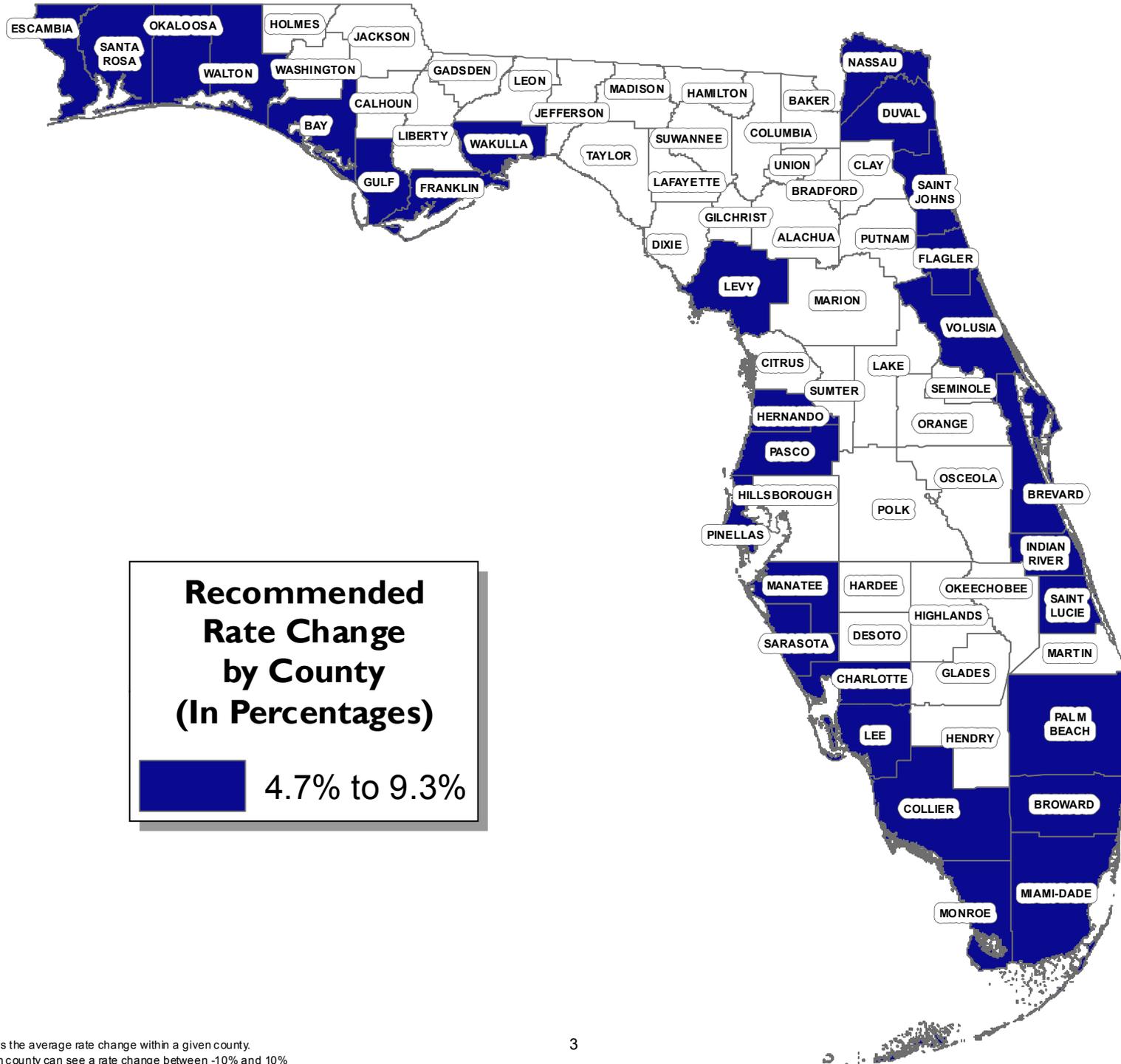


**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 3 - Percent of Recommended Rate Change by County

Wind-Only HW2 Policies



**Recommended Rate Change by County (In Percentages)**

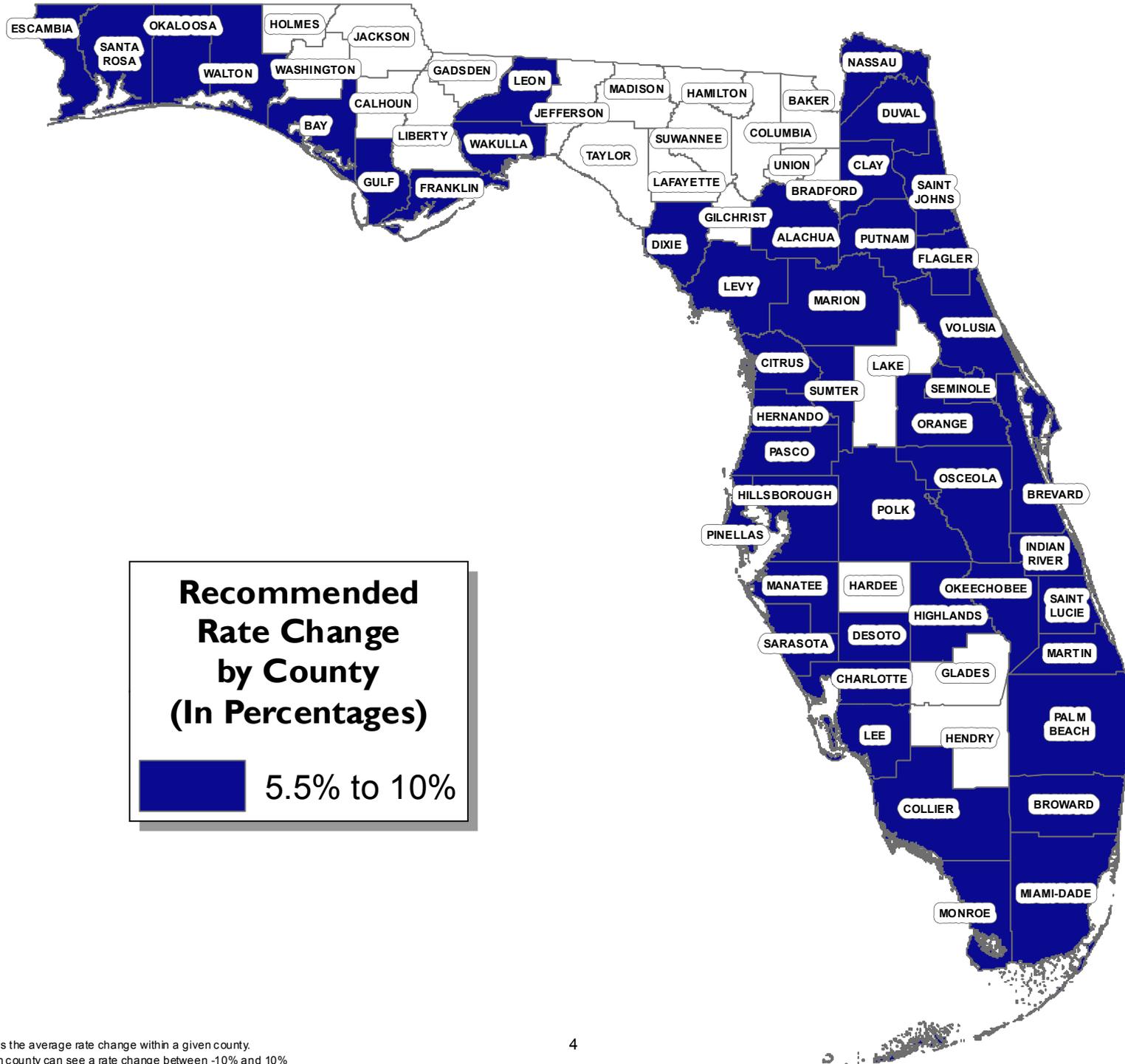
4.7% to 9.3%

**Notes:**

- 1. Percentage of rate change is the average rate change within a given county.
- 2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 4 - Percent of Recommended Rate Change by County

Multi-Peril HO6 Policies

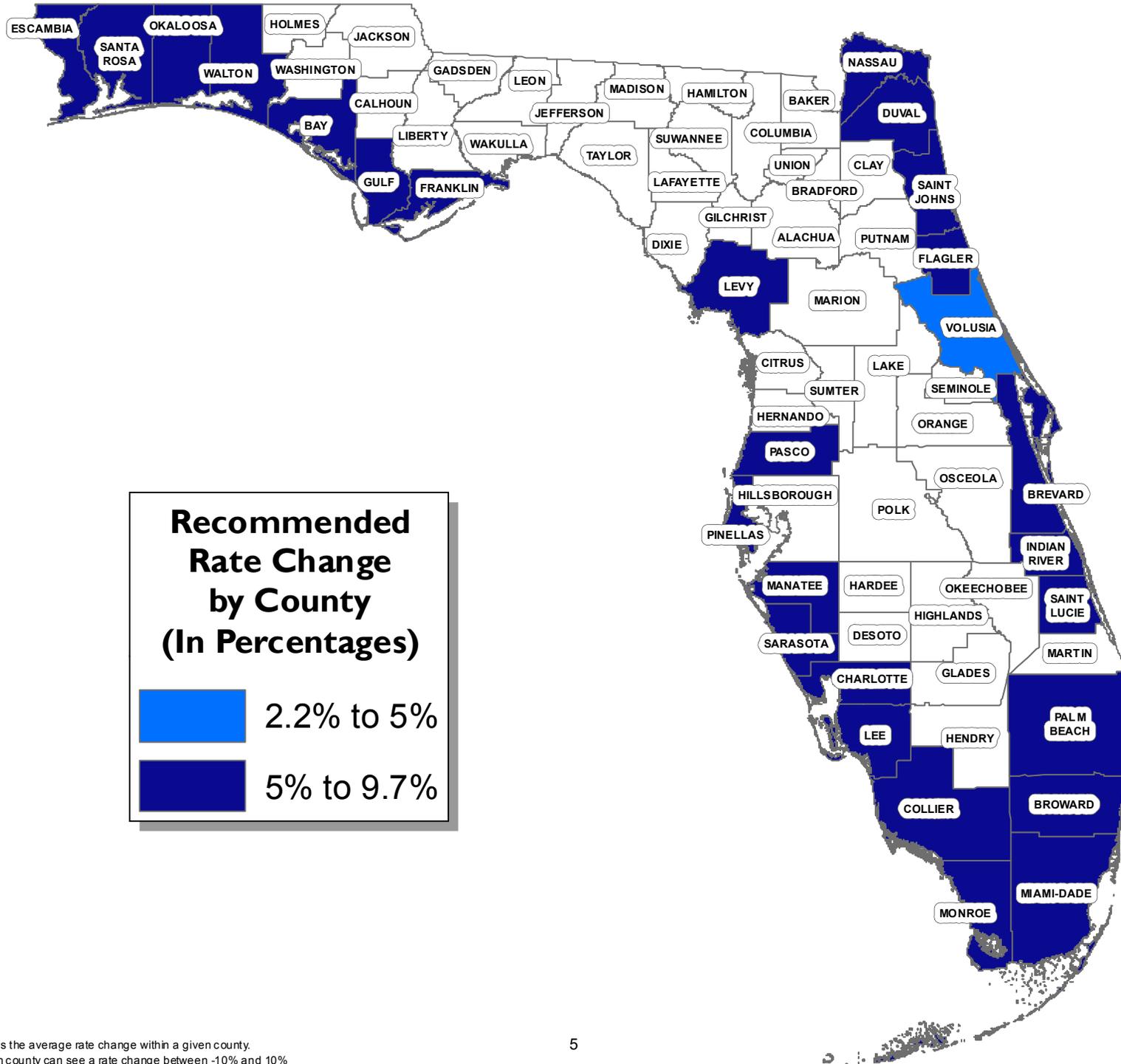


**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 5 - Percent of Recommended Rate Change by County

Wind-Only HW6 Policies



**Recommended Rate Change by County (In Percentages)**

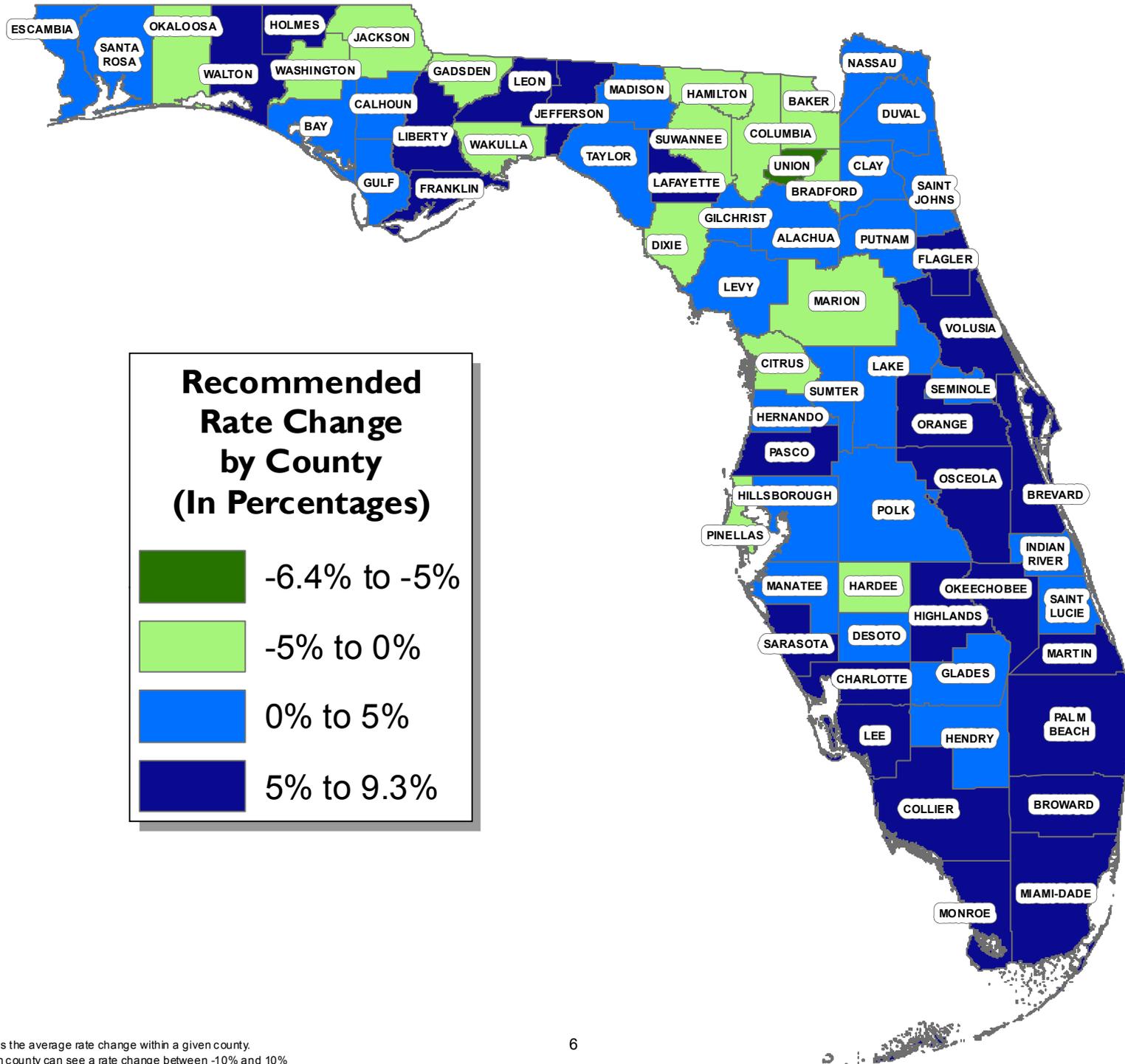
	2.2% to 5%
	5% to 9.7%

**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 6 - Percent of Recommended Rate Change by County

Multi-Peril DPI and DP3 Policies

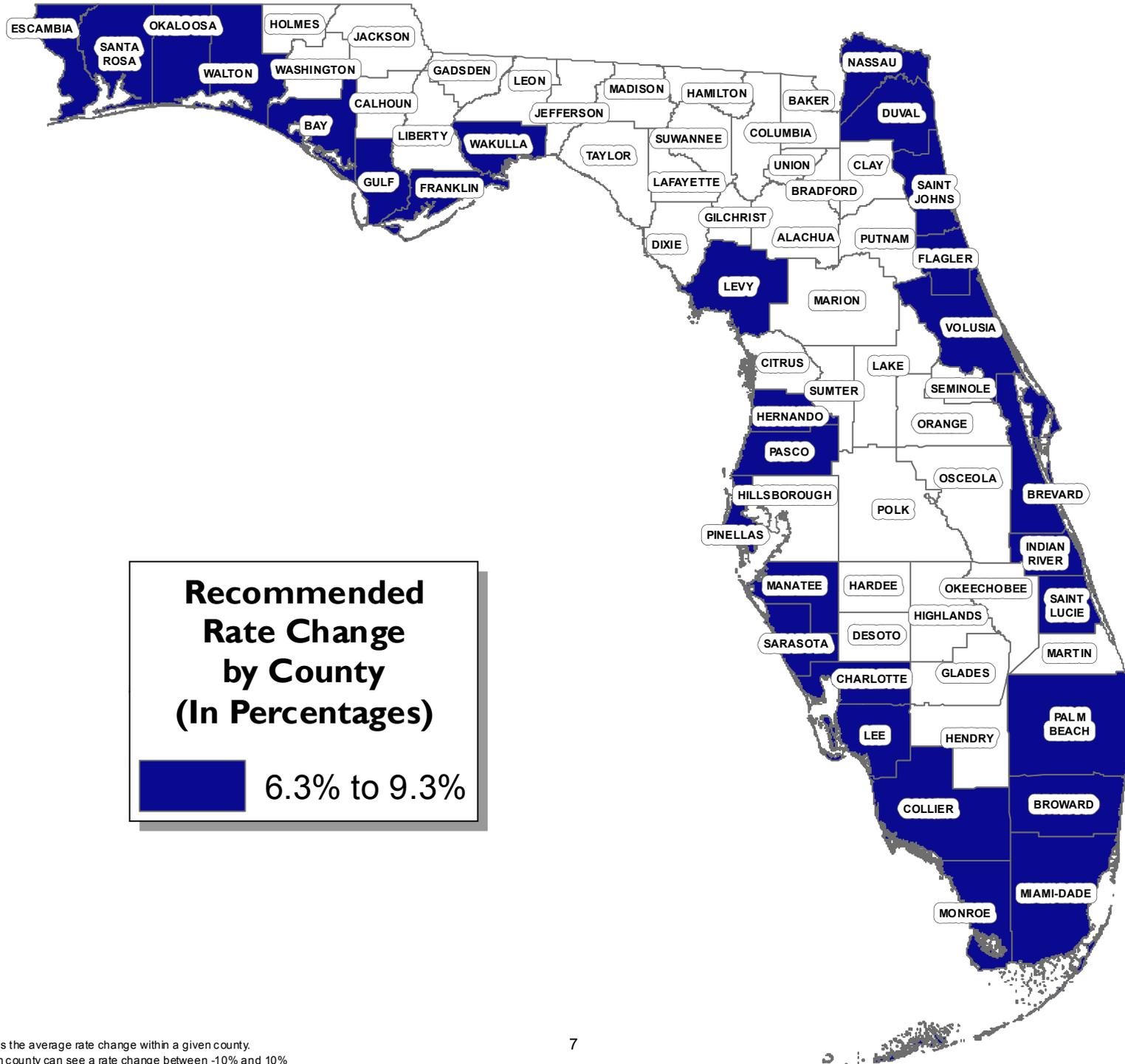


**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 7 - Percent of Recommended Rate Change by County

Wind-Only DW2 Policies



**Recommended Rate Change by County (In Percentages)**

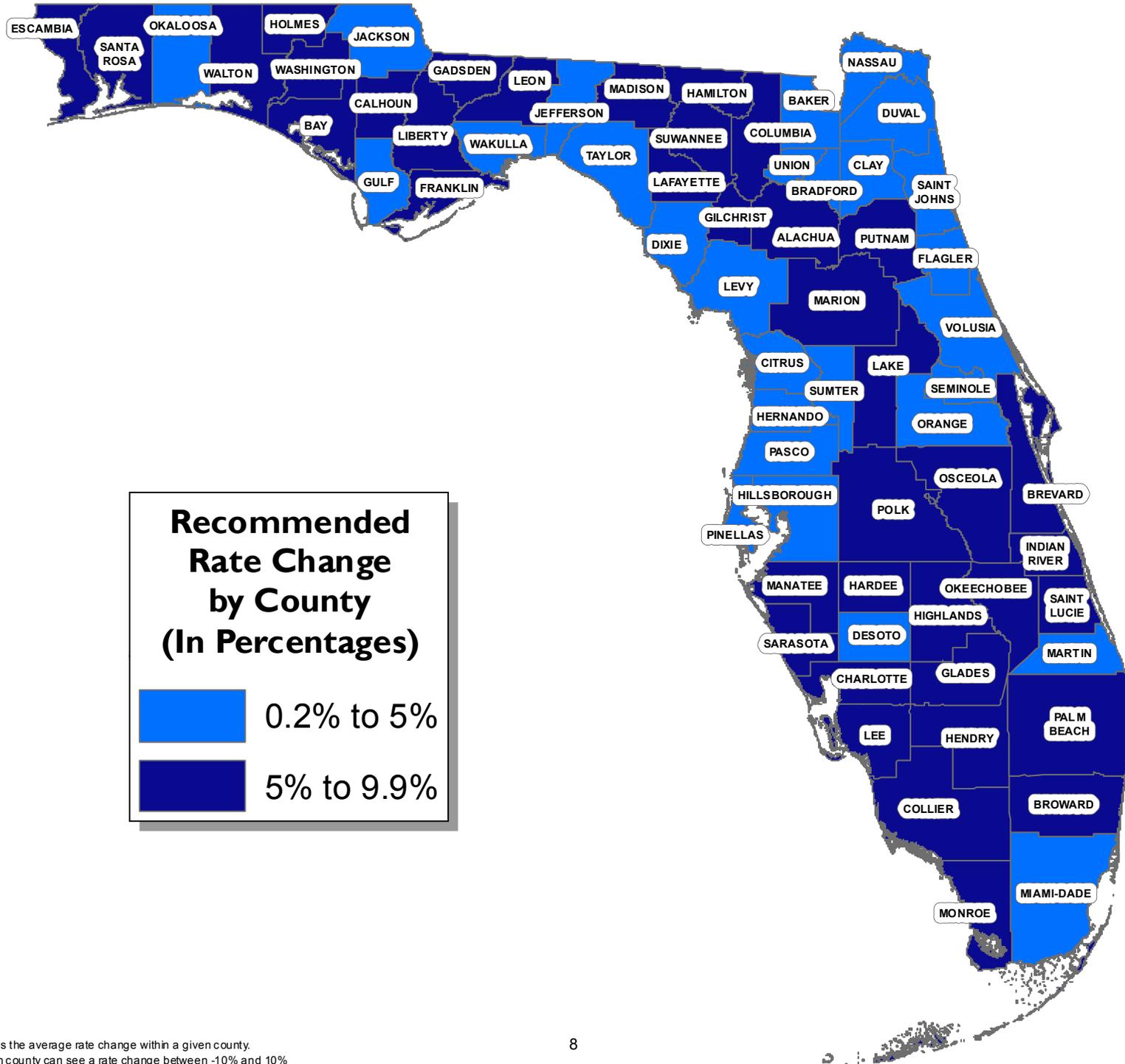
6.3% to 9.3%

**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

# Exhibit 8 - Percent of Recommended Rate Change by County

Multi-Peril MHO3 and MDPI Policies



**Recommended Rate Change by County (In Percentages)**

0.2% to 5%

5% to 9.9%

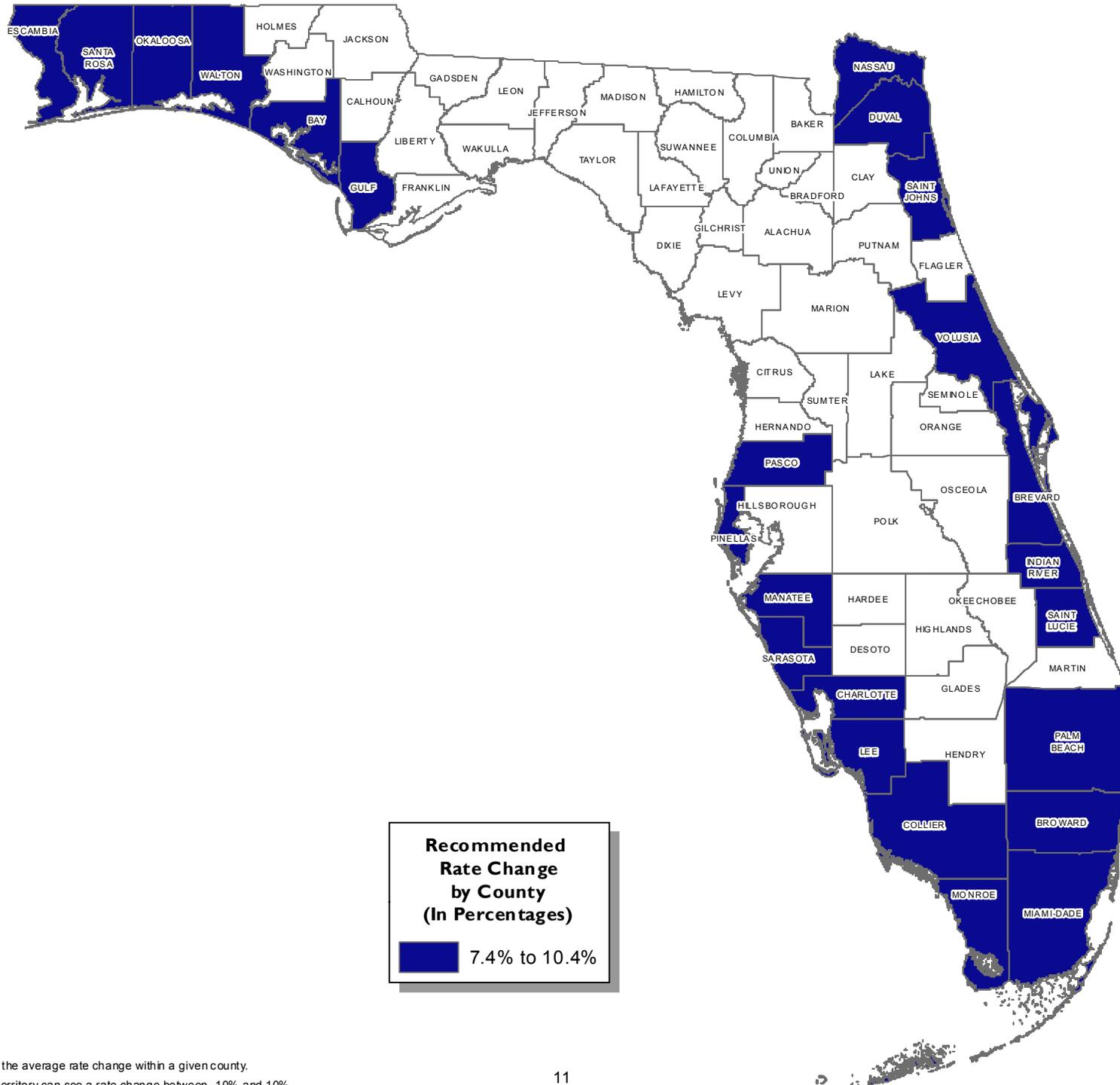
**Notes:**  
 1. Percentage of rate change is the average rate change within a given county.  
 2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.





# Exhibit II - Percent of Recommended Rate Change by County

## Wind-Only Commercial Residential Policies



**Recommended Rate Change by County (In Percentages)**

7.4% to 10.4%

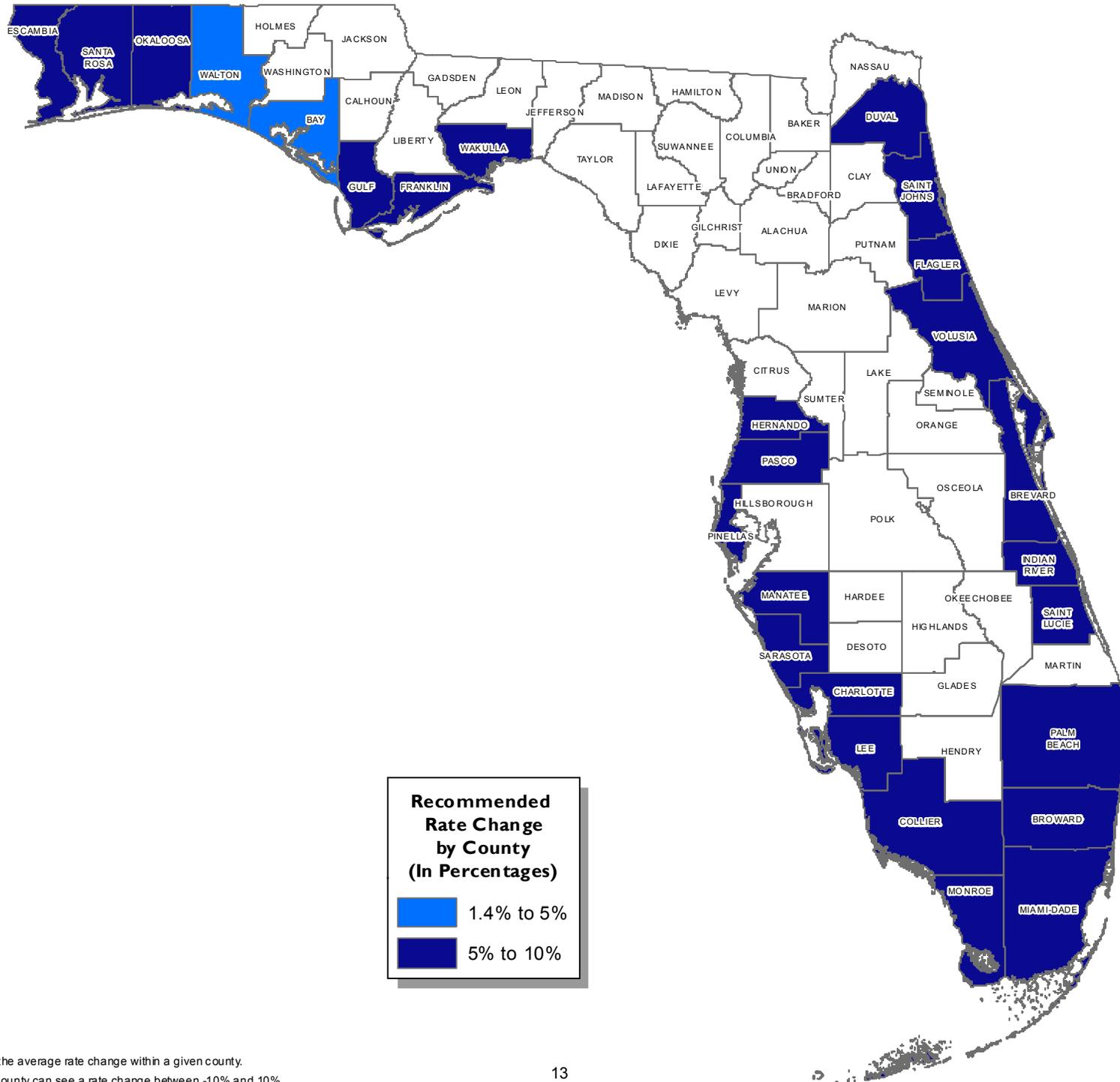
**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given territory can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.



# Exhibit 13 - Percent of Recommended Rate Change by County

Wind-Only Commercial Non-Residential Policies



**Recommended Rate Change by County (In Percentages)**

- 1.4% to 5%
- 5% to 10%

**Notes:**

1. Percentage of rate change is the average rate change within a given county.
2. Policy holders within a given county can see a rate change between -10% and 10% excluding effects of the FHCF build-up pass through.

Exhibit 14  
 Distribution of Recommended Rate Changes by Policy  
 for the Personal Lines Account

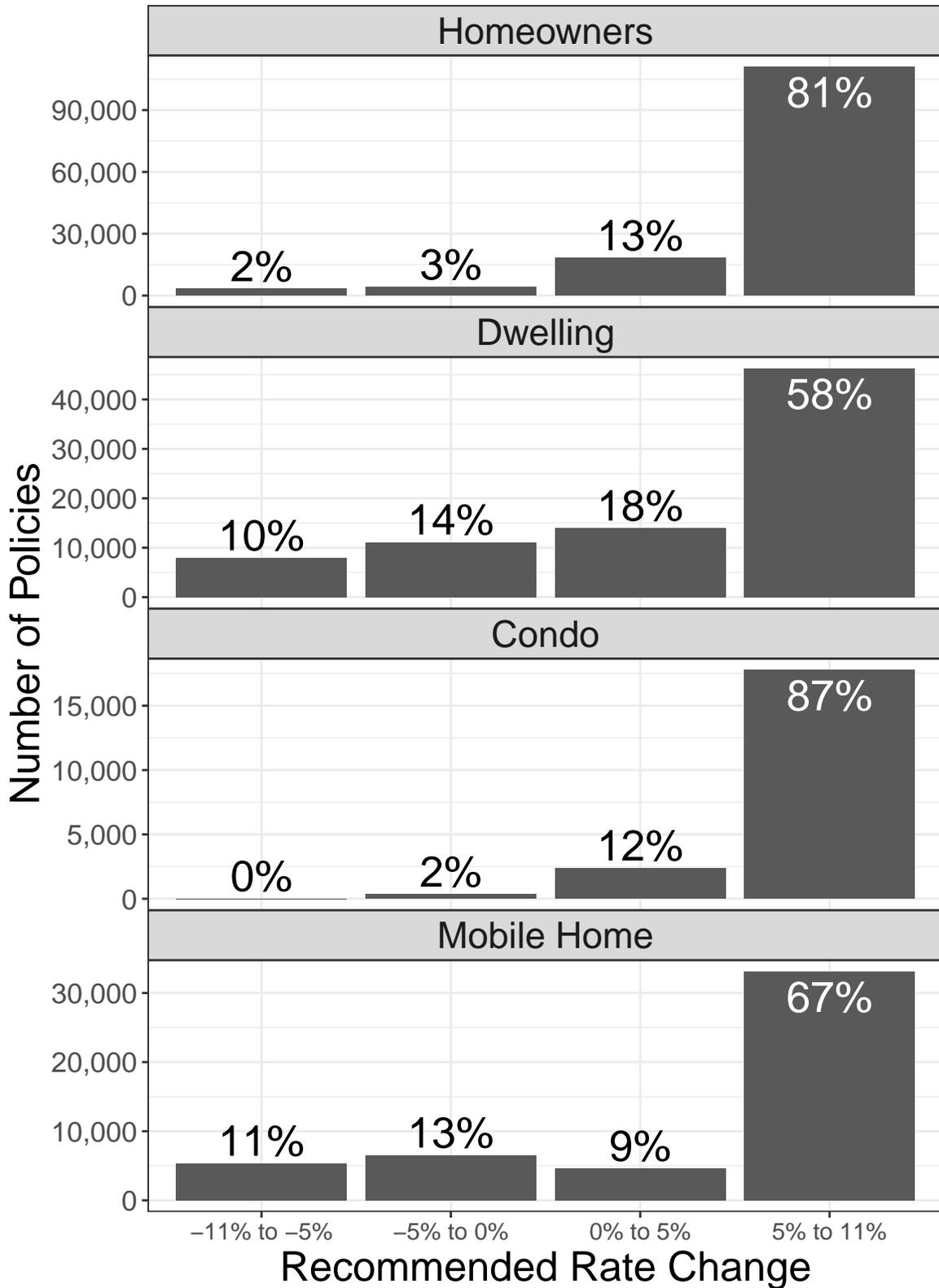
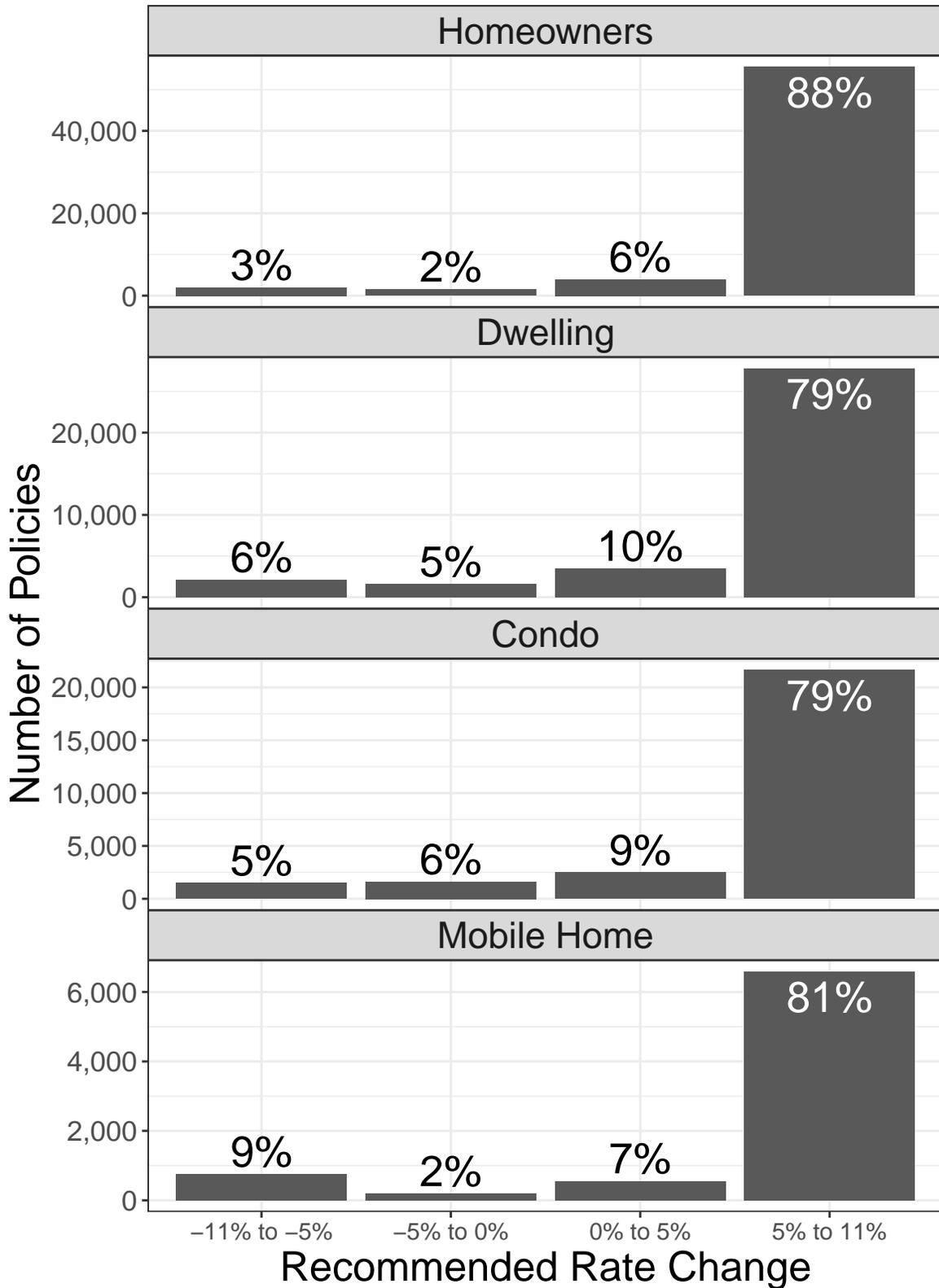


Exhibit 15  
 Distribution of Recommended Rate Changes by Policy  
 for the Coastal Account



**EXHIBIT 16 - MULTIPERIL HO3  
Recommended Change by County**

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Alachua	101	3	1,157	7.6%	1,245
Baker	5	0	1,210	8.6%	1,314
Bay	192	49	1,542	3.4%	1,594
Bradford	4	0	1,476	9.3%	1,613
Brevard	1,776	149	1,843	5.1%	1,937
Broward	27,262	0	2,998	9.9%	3,294
Calhoun	4	0	1,311	8.5%	1,422
Charlotte	853	106	1,461	6.2%	1,552
Citrus	248	69	1,237	0.7%	1,246
Clay	57	0	1,123	8.1%	1,214
Collier	303	2	1,882	9.0%	2,052
Columbia	14	0	1,287	8.3%	1,393
Dade	54,431	419	3,594	9.8%	3,945
De Soto	15	4	1,499	4.7%	1,570
Dixie	21	21	1,302	-4.2%	1,247
Duval	329	0	1,204	9.3%	1,317
Escambia	308	23	1,947	5.6%	2,055
Flagler	43	0	1,590	9.4%	1,739
Franklin	30	26	1,915	-3.4%	1,849
Gadsden	79	12	1,005	6.2%	1,067
Gilchrist	17	1	1,236	6.3%	1,314
Glades	10	0	1,333	5.6%	1,408
Gulf	12	5	2,830	2.6%	2,904
Hamilton	2	0	995	9.6%	1,090
Hardee	3	0	903	7.2%	967
Hendry	30	0	1,815	9.3%	1,983
Hernando	8,801	84	1,304	6.8%	1,393
Highlands	32	0	1,331	8.8%	1,449
Hillsborough	10,194	11	1,491	7.9%	1,609
Holmes	9	0	989	8.9%	1,077
Indian River	207	1	1,891	7.8%	2,038
Jackson	37	9	1,079	5.6%	1,140
Jefferson	10	1	967	5.5%	1,021
Lafayette	1	0	2,280	9.7%	2,501
<b>Total</b>	<b>158,825</b>	<b>7,614</b>	<b>2,589</b>	<b>8.5%</b>	<b>2,808</b>

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Lake	104	1	1,051	8.6%	1,141
Lee	848	23	1,719	8.9%	1,872
Leon	88	1	922	8.0%	996
Levy	46	40	1,530	-4.7%	1,458
Liberty	2	0	1,738	9.3%	1,900
Madison	6	0	1,198	6.3%	1,273
Manatee	1,138	67	1,616	7.1%	1,732
Marion	151	1	1,071	7.9%	1,156
Martin	185	0	2,853	7.0%	3,052
Monroe	387	22	3,663	8.3%	3,966
Nassau	67	2	1,471	6.5%	1,567
Okaloosa	118	110	1,917	-5.5%	1,811
Okeechobee	23	3	1,476	6.6%	1,573
Orange	341	0	1,405	9.4%	1,537
Osceola	128	0	1,301	9.6%	1,426
Palm Beach	10,725	54	2,833	7.7%	3,052
Pasco	8,294	24	1,394	6.3%	1,482
Pinellas	26,800	5,964	1,658	2.8%	1,705
Polk	150	13	1,420	7.1%	1,521
Putnam	30	3	1,255	5.3%	1,323
Saint Johns	223	2	1,467	8.0%	1,584
Saint Lucie	489	3	1,760	8.9%	1,917
Santa Rosa	86	67	2,532	-2.0%	2,482
Sarasota	1,873	109	1,652	8.2%	1,788
Seminole	143	0	1,350	9.2%	1,474
Sumter	13	1	1,005	7.8%	1,083
Suwannee	5	0	2,790	9.7%	3,061
Taylor	39	39	1,684	-4.9%	1,601
Union	0	0	0	N/A	N/A
Volusia	804	36	1,294	6.7%	1,381
Wakulla	20	10	1,406	-1.0%	1,392
Walton	51	22	2,452	0.2%	2,457
Washington	8	2	1,543	5.5%	1,628

**EXHIBIT 17 - WIND-ONLY HW2**  
**Recommended Change by County**

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Alachua	0	0	0	N/A	N/A
Baker	0	0	0	N/A	N/A
Bay	256	18	1,798	8.8%	1,957
Bradford	0	0	0	N/A	N/A
Brevard	248	10	2,481	8.8%	2,700
Broward	6,910	399	2,798	8.6%	3,039
Calhoun	0	0	0	N/A	N/A
Charlotte	118	1	2,109	9.2%	2,303
Citrus	0	0	0	N/A	N/A
Clay	0	0	0	N/A	N/A
Collier	687	15	2,794	9.1%	3,048
Columbia	0	0	0	N/A	N/A
Dade	8,113	1,761	3,113	6.1%	3,304
De Soto	0	0	0	N/A	N/A
Dixie	0	0	0	N/A	N/A
Duval	160	6	1,252	9.1%	1,366
Escambia	1,437	7	2,168	9.3%	2,370
Flagler	244	0	1,102	9.3%	1,204
Franklin	130	14	2,448	7.6%	2,635
Gadsden	0	0	0	N/A	N/A
Gilchrist	0	0	0	N/A	N/A
Glades	0	0	0	N/A	N/A
Gulf	84	7	2,218	8.8%	2,414
Hamilton	0	0	0	N/A	N/A
Hardee	0	0	0	N/A	N/A
Hendry	0	0	0	N/A	N/A
Hernando	57	7	1,281	7.9%	1,382
Highlands	0	0	0	N/A	N/A
Hillsborough	0	0	0	N/A	N/A
Holmes	0	0	0	N/A	N/A
Indian River	151	4	3,604	9.0%	3,927
Jackson	0	0	0	N/A	N/A
Jefferson	0	0	0	N/A	N/A
Lafayette	0	0	0	N/A	N/A
<b>Total</b>	<b>40,712</b>	<b>3,249</b>	<b>2,656</b>	<b>7.9%</b>	<b>2,865</b>

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Lake	0	0	0	N/A	N/A
Lee	1,487	46	2,298	9.0%	2,506
Leon	0	0	0	N/A	N/A
Levy	73	2	1,165	8.9%	1,268
Liberty	0	0	0	N/A	N/A
Madison	0	0	0	N/A	N/A
Manatee	142	5	2,484	9.0%	2,707
Marion	0	0	0	N/A	N/A
Martin	0	0	0	N/A	N/A
Monroe	6,658	0	3,467	7.8%	3,737
Nassau	92	0	933	9.3%	1,020
Okaloosa	53	1	3,515	9.1%	3,836
Okeechobee	0	0	0	N/A	N/A
Orange	0	0	0	N/A	N/A
Osceola	0	0	0	N/A	N/A
Palm Beach	5,101	299	2,865	8.6%	3,112
Pasco	172	33	1,385	4.7%	1,451
Pinellas	1,548	6	2,436	9.3%	2,661
Polk	0	0	0	N/A	N/A
Putnam	0	0	0	N/A	N/A
Saint Johns	160	3	1,198	9.2%	1,308
Saint Lucie	51	0	1,736	9.3%	1,897
Santa Rosa	278	0	2,610	9.3%	2,854
Sarasota	4,879	457	1,366	8.4%	1,480
Seminole	0	0	0	N/A	N/A
Sumter	0	0	0	N/A	N/A
Suwannee	0	0	0	N/A	N/A
Taylor	0	0	0	N/A	N/A
Union	0	0	0	N/A	N/A
Volusia	1,030	65	1,224	9.0%	1,334
Wakulla	44	3	1,179	8.8%	1,282
Walton	349	80	2,161	4.8%	2,264
Washington	0	0	0	N/A	N/A

**EXHIBIT 18 - MULTIPERIL HO6  
Recommended Change by County**

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Alachua	73	0	382	10.0%	420
Baker	0	0	0	N/A	N/A
Bay	57	0	764	8.5%	829
Bradford	0	0	0	N/A	N/A
Brevard	534	23	834	6.6%	889
Broward	11,163	995	833	8.3%	903
Calhoun	0	0	0	N/A	N/A
Charlotte	197	0	697	9.2%	762
Citrus	2	0	916	9.1%	999
Clay	6	0	323	9.9%	355
Collier	338	0	1,209	7.9%	1,305
Columbia	0	0	0	N/A	N/A
Dade	7,823	387	955	8.9%	1,040
De Soto	5	0	342	9.9%	376
Dixie	1	0	425	10.0%	468
Duval	47	0	569	9.9%	625
Escambia	91	0	1,089	7.4%	1,170
Flagler	9	0	870	9.6%	954
Franklin	1	0	791	9.9%	870
Gadsden	0	0	0	N/A	N/A
Gilchrist	0	0	0	N/A	N/A
Glades	0	0	0	N/A	N/A
Gulf	1	0	2,076	9.9%	2,282
Hamilton	0	0	0	N/A	N/A
Hardee	0	0	0	N/A	N/A
Hendry	0	0	0	N/A	N/A
Hernando	34	0	790	9.9%	868
Highlands	1	0	456	9.8%	501
Hillsborough	481	0	652	7.5%	701
Holmes	0	0	0	N/A	N/A
Indian River	100	0	1,191	5.7%	1,258
Jackson	0	0	0	N/A	N/A
Jefferson	0	0	0	N/A	N/A
Lafayette	0	0	0	N/A	N/A
<b>Total</b>	<b>33,953</b>	<b>1,924</b>	<b>859</b>	<b>7.9%</b>	<b>927</b>

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Lake	0	0	0	N/A	N/A
Lee	537	18	737	7.2%	790
Leon	60	0	292	8.5%	317
Levy	2	0	469	10.0%	516
Liberty	0	0	0	N/A	N/A
Madison	0	0	0	N/A	N/A
Manatee	327	3	875	8.8%	951
Marion	14	1	569	8.5%	617
Martin	165	0	1,004	9.5%	1,100
Monroe	129	32	1,517	6.6%	1,617
Nassau	8	0	1,699	9.6%	1,862
Okaloosa	63	0	695	9.0%	757
Okeechobee	1	0	1,845	9.9%	2,027
Orange	146	0	474	9.2%	517
Osceola	34	0	416	9.6%	456
Palm Beach	5,848	196	980	7.1%	1,049
Pasco	544	0	485	8.4%	525
Pinellas	4,119	267	636	5.5%	671
Polk	16	0	655	8.9%	714
Putnam	1	0	364	9.9%	400
Saint Johns	55	0	762	9.2%	832
Saint Lucie	158	0	1,046	9.5%	1,145
Santa Rosa	11	0	943	9.8%	1,035
Sarasota	352	2	1,208	7.0%	1,292
Seminole	41	0	455	9.9%	501
Sumter	1	0	843	10.0%	927
Suwannee	0	0	0	N/A	N/A
Taylor	0	0	0	N/A	N/A
Union	0	0	0	N/A	N/A
Volusia	322	0	578	7.3%	620
Wakulla	1	0	1,724	9.8%	1,894
Walton	34	0	1,231	9.6%	1,349
Washington	0	0	0	N/A	N/A

**EXHIBIT 19 - WIND-ONLY HW6**  
**Recommended Change by County**

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Alachua	0	0	0	N/A	N/A
Baker	0	0	0	N/A	N/A
Bay	185	27	561	7.5%	603
Bradford	0	0	0	N/A	N/A
Brevard	257	45	759	6.9%	811
Broward	2,257	310	718	6.5%	765
Calhoun	0	0	0	N/A	N/A
Charlotte	113	0	922	9.7%	1,012
Citrus	0	0	0	N/A	N/A
Clay	0	0	0	N/A	N/A
Collier	760	97	964	7.1%	1,033
Columbia	0	0	0	N/A	N/A
Dade	2,127	344	1,362	5.7%	1,440
De Soto	0	0	0	N/A	N/A
Dixie	0	0	0	N/A	N/A
Duval	23	2	542	7.8%	585
Escambia	291	9	783	8.7%	851
Flagler	24	1	483	7.2%	517
Franklin	6	0	363	8.5%	394
Gadsden	0	0	0	N/A	N/A
Gilchrist	0	0	0	N/A	N/A
Glades	0	0	0	N/A	N/A
Gulf	2	0	1,730	9.7%	1,898
Hamilton	0	0	0	N/A	N/A
Hardee	0	0	0	N/A	N/A
Hendry	0	0	0	N/A	N/A
Hernando	0	0	0	N/A	N/A
Highlands	0	0	0	N/A	N/A
Hillsborough	0	0	0	N/A	N/A
Holmes	0	0	0	N/A	N/A
Indian River	183	14	1,449	7.5%	1,558
Jackson	0	0	0	N/A	N/A
Jefferson	0	0	0	N/A	N/A
Lafayette	0	0	0	N/A	N/A
<b>Total</b>	<b>13,764</b>	<b>1,530</b>	<b>941</b>	<b>7.2%</b>	<b>1,009</b>

County	Number of Policies		Current	Recommended	
	Total	Rate Decreases	Average Premium	Rate Change	Average Premium
Lake	0	0	0	N/A	N/A
Lee	857	6	914	9.6%	1,002
Leon	0	0	0	N/A	N/A
Levy	5	0	199	9.7%	218
Liberty	0	0	0	N/A	N/A
Madison	0	0	0	N/A	N/A
Manatee	206	1	890	9.6%	976
Marion	0	0	0	N/A	N/A
Martin	0	0	0	N/A	N/A
Monroe	1,347	1	1,044	9.6%	1,145
Nassau	27	7	885	6.3%	941
Okaloosa	187	27	648	7.9%	699
Okeechobee	0	0	0	N/A	N/A
Orange	0	0	0	N/A	N/A
Osceola	0	0	0	N/A	N/A
Palm Beach	2,258	283	949	6.2%	1,009
Pasco	26	1	399	8.1%	432
Pinellas	632	52	802	8.1%	867
Polk	0	0	0	N/A	N/A
Putnam	0	0	0	N/A	N/A
Saint Johns	50	10	675	7.5%	725
Saint Lucie	118	9	718	7.5%	772
Santa Rosa	62	6	723	9.0%	788
Sarasota	1,188	160	884	8.1%	956
Seminole	0	0	0	N/A	N/A
Sumter	0	0	0	N/A	N/A
Suwannee	0	0	0	N/A	N/A
Taylor	0	0	0	N/A	N/A
Union	0	0	0	N/A	N/A
Volusia	334	82	537	2.2%	549
Wakulla	0	0	0	N/A	N/A
Walton	239	36	847	8.1%	915
Washington	0	0	0	N/A	N/A