

CLIENT ALERT

California Department of Insurance Hosts Webinar on Navigating the Updated Complete Rate Application Intake Process

August 14, 2025

AUTHORS

Kara Baysinger | Stephanie Duchene | Laura Leigh Geist | David G. Nadig
Shlomo Potesky

On Thursday, August 7, the California Department of Insurance (“CDI”) hosted a webinar to help insurers navigate the updated Complete Rate Application (“CRA”) intake process. The overarching goal of this updated process is to implement changes and processes that comply with the 60-30-30 timeline provided by CDI in [Bulletin 2024-7, Revisions to Department Review of Complete Rate Applications](#). In short, this timeline aims to have CDI complete its review of a rate application within 60 days of the date of the filing’s public notice, with up to two 30-day extensions, if needed.

During the webinar, CDI explained that it is building a Prior Approval Rate Application (“PARA”) portal which will be a web-based portal for building a PARA, which, once completed in the portal, can be submitted via SERFF. CDI expects this portal to become available in the coming weeks. CDI is also building a Data Reconciliation Tool (“DRT”) which will be integrated in the PARA portal and will enable insurers to confirm that the PARA is fully reconciled from a data perspective. CDI expects the DRT to be integrated and available in the PARA portal by the end of 2025.

CDI also explained that as part of the CRA initiative, rate review staff has started reviewing filings under the Complete Rate Application regulations, and that the intake process now includes analysts and/or actuaries who ensure that the filing is compliant and includes all required elements to help expedite review once the filing is placed on Public Notice. In other words, the intake process now includes a fuller but still non-substantive review to ensure that all required portions of the rate application are included in the filing.

The webinar then presented some areas of the application where reviewers find frequent issues, most often consisting of missing or incomplete aspects of the filing. In particular, CDI emphasized the importance of insurers ensuring that the Filing Memorandum is included in the filing, and is complete. CDI also encouraged filers to carefully use and adhere to the [PARA Instructions](#), which provide that any proposed changes not addressed in the Filing Memorandum are not approved, raising potential implications under the filed rate doctrine.

PRID Determinations

Relatedly, on July 24, 2025, CDI issued its first pre-application required information determination (“PRID”) to Verisk for its Wildfire Model for the United States Version 4.0.0. Additionally, CDI issued PRIDs to Karen Clark & Company’s US Wildfire Reference Model Version 3.0 on July 31 and Moody’s Analytics, Inc.’s North America Wildfire Model Version 2.0 on August 1.

As we reported [here](#), as part of the Catastrophe Models and Ratemaking Regulations that CDI promulgated in December 2024, a PRID is a non-adjudicative determination by CDI that a wildfire catastrophe model includes the model information that an insurer will be required to submit in a CRA that relies on such model.

We note that on August 1, Consumer Watchdog issued a [press release](#) reiterating its opposition to the PRID process, arguing that it fails to conform with Proposition 103’s “public inspection” requirement. In preparing future filings that use catastrophe models, insurers should consider strategies to respond promptly to, and minimize delays from, such objections likely to be raised by intervenors from an insurer’s use of a PRID.

If you have any questions regarding this client alert, please contact the following attorneys or the Willkie attorney with whom you regularly work.

Kara Baysinger

415 858 7425

kbaysinger@willkie.com

Stephanie Duchene

310 855 3066

sduchene@willkie.com

Laura Leigh Geist

415 858 7440

lgeist@willkie.com

David G. Nadig

312 728 9097

dnadig@willkie.com

Shlomo Potesky

212 728 3232

spotesky@willkie.com

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BRUSSELS CHICAGO DALLAS FRANKFURT HAMBURG HOUSTON LONDON LOS ANGELES
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