RA 26-178

INSURANCE DIVISION[191]

Regulatory Analysis

Notice of Intended Action to be published: 191—Chapter 55
"Licensing of Public Adjusters"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 522C as amended by 2026 Iowa Acts, House File 2582, section 4

State or federal law(s) implemented by the rulemaking: Iowa Code chapter 522C as amended by 2026 Iowa Acts, House File 2582, section 4

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

August 13, 2026 1 p.m.	Insurance Division 1963 Bell Avenue, Suite 100 Des Moines, Iowa

Public Comment

Any interested person may submit written comments concerning this Regulatory Analysis, which must be received by the Insurance Division no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

Angela Burke Boston
Iowa Insurance Division
1963 Bell Avenue, Suite 100
Des Moines, Iowa 50315
Email: angela.burke.boston@iid.iowa.gov

Purpose and Summary

This rulemaking addresses the financial responsibility requirements for adjusters that had been set out in the Iowa Code and in an Insurance Division Bulletin. Rule 191—55.10(522C) allows for expanded methods by which adjusters may comply with financial responsibility requirements. The financial responsibility requirements could be the subject of frequent adjustments; therefore, the rulemaking process affords greater flexibility in addressing such changes.

Analysis of Impact

1. **Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

Individual adjusters, adjuster business entities and insurers will bear the costs of the proposed rulemaking.

- **Classes of persons that will benefit from the proposed rulemaking:**

Individual adjusters, adjuster business entities, insurers and consumers will benefit from the proposed rulemaking. The imposition of financial responsibility requirements protect against unfair and unprofessional adjuster practices.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

The proposed rulemaking clarifies the financial responsibility requirements but does not alter the licensing process. Individual adjusters, adjuster business entities and insurers may incur costs in obtaining instruments to comply with the financial responsibility requirements.

- **Qualitative description of impact:**

The proposed rulemaking allows for the continued administration of the adjuster licensing process by the Division and ensures oversight of individual adjusters, adjuster business entities and insurers handling claims service functions.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

No costs are borne by the agency or any other agency.

- **Anticipated effect on State revenues:**

The proposed rulemaking has no anticipated effect on State revenues.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

Placement of the financial responsibility requirements into the administrative rules supports the adjuster licensing process and provides more flexibility and clarity regarding the obligations of individual adjusters, adjuster business entities and insurers doing business in Iowa. No additional costs are anticipated from the proposed rulemaking.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The Division did not identify any less costly or less intrusive methods.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

The Division did not consider any other methods.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The Division did not consider any other methods.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

The proposed rulemaking does not have a substantial impact on small business.

Emergency Rulemaking Adopted by Reference

The content of this Regulatory Analysis was previously published as an Adopted and Filed Emergency rulemaking (see **ARC 0304D**, IAB 5/27/26). The purpose of this Regulatory Analysis is to fulfill the requirements of Iowa Code section 17A.4A for that emergency rulemaking, whose subject matter is hereby adopted by reference.