STATE OF MISSOURI

DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-11

Addendum: Post Storm Cancellations and Non-Renewals

Issued: November 4, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To:	**All property and casualty insurers writing homeowners and dwelling insurance covering residential properties and property and casualty insurers writing Condominium Master Policies**
From:	**Angela L. Nelson, Director**
Re:	**Addendum: Post Storm Policy Non-Renewals and Cancellations for homeowners and dwelling policies covering residential properties and master policies issued to condominium owners/associations**

Since the issuance of Bulletin 25-10 the Department has received inquiries from Missouri consumers, producers and insurers. This Bulletin is being issued as both an addendum and a clarification to Bulletin 25-10, issued on October 13, 2025.

The Department has received multiple complaints indicating that condominium complexes throughout the State of Missouri have received non-renewal or cancellation notices. These are for master policies issued to the condominium owner/association and not policies issued to individual condominium unit owners. The Department understands these condominiums are still in the process of negotiating their damage claims with their insurance companies or are in the process of completing repairs. The Department was advised that these non-renewals are adversely affecting hundreds of condominium residents throughout the state, causing significant coverage issues.

As a result of these inquiries and complaints, the provisions of Bulletin 25-10 are hereby extended to apply to master policies issued to condominiums located within the State of Missouri, effective immediately. This extension does not, in any way, apply to Condominium Homeowners policies (commonly referred to as an HO-6 or its equivalent).

The Department also received inquiries asking if Bulletin 25-10 was intended to apply to commercial property policies and from insurers seeking guidance on the anticipated duration of Bulletin 25-10. The Department was also asked to provide further guidance in terms of the applicability of the moratorium as to non-renewals and cancellations that were effectuated prior to the issuance of Bulletin 25-10.

The following information is intended to address those questions and provide additional information and guidance to impacted insurers.

- Bulletin 25-10 clearly limited the scope of the Bulletin to insurers writing and issuing homeowners and dwelling policies covering "residential properties". Accordingly Bulletin 25-10 was not intended to apply to commercial properties.

  However, with the issuance of Bulletin 25-11, that scope is now modified to also include master policies issued to condominium owners/associations, as further detailed in this Bulletin. No other insurance policies covering other properties or risks are included within the scope at this time.

- The Department continues to closely monitor consumer complaints, updates from State Emergency Management officials and media reports from around the State to determine the status of recovery efforts. The Department continues to receive volumes of consumer complaints and inquiries as well as media inquiries relating to recovery delays. Most delays have been related to contractor or supply issues, but some are related to debris (in St. Louis), which has complicated recovery efforts. A number of complaints and media reports have unfortunately focused on concerns about claims handling by insurance companies, which have allegedly resulted in delays.

As to the expected duration of the Bulletin, the Department directs readers to Executive Order 31, issued by Governor Mike Kehoe on October 29, 2025. This Executive Order extends the State of Emergency within the State, due to "ongoing conditions of distress and hazard to the safety, welfare and property of the Citizens of Missouri."

The Department will continue to monitor recovery efforts, but in terms of guidance, the Department anticipates Bulletin 25-10 and Bulletin 25-11 will remain in effect for at least as long as a State of Emergency exists within the State. Executive Order 31 is currently set to expire on December 31, 2025, *unless otherwise extended*.

- The Department has also received questions about how far back insurers are expected to reinstate coverage. The Department reminds insurers of the intent behind both Bulletins, which is to ensure that property owners who have been unable to complete repairs (for any multitude of reasons) have insurance coverage and that they are not forced to secure coverage for a home that still has unrepaired damage.

  For those circumstances where coverage has not yet expired or terminated, the Department expects insurers to take necessary actions to ensure coverage remains continuously in force.

  For those circumstances where coverage ended prior to the issuance of either Bulletin, the Department expects insurers to consider the individual facts and circumstances and use their best judgment in extending or otherwise reinstating coverage. Insurers will be asked to provide an explanation for why coverage was not extended or reinstated for a policyholder in those cases where a consumer complaint is filed with the Consumer Affairs Division.

Any further questions from insurers regarding this Bulletin should be directed to the Market Regulation Division by email at marketconduct@insurance.mo.gov.

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