

SERFF Tracking #:	ACEH-134921974	State Tracking #:	Company Tracking #:	26-PIM-2026910 (REFILE)
State:	California	Filing Company:	WESTCHESTER FIRE INSURANCE COMPANY	
TOI/Sub-TOI:	09.0 Inland Marine/09.0004 Pet Insurance Plans			
Product Name:	Personal Inland Marine			
Project Name/Number:	Healthy Paws Indemnity Filing/26-PIM-2026910 (Refile)			

Disposition

Disposition Date: 05/29/2026

Effective Date (New):

Effective Date (Renewal):

Status: Rejected at Intake

Comment:

The Department has determined that this filing is incomplete and unacceptable for review because it fails to provide the information, materials, and documentation required under Insurance Code §1861.05 and 10 CCR §2648.4 for a complete rate application. This rejection is without prejudice to the company's ability to submit a new, fully compliant filing; however, the deficiencies identified below are significant and must be addressed before any resubmission will be considered.

First, when an insurer offers multiple programs for the same coverage, the underwriting guidelines must clearly establish mutually exclusive eligibility criteria, or the insurer must offer all programs for which an applicant qualifies. The guidelines submitted for this new program do not meet that standard. Although they attempt to show exclusivity, several of the proposed restrictions and eligibility requirements raise serious concerns regarding fairness, transparency, and the appropriate allocation of applicants between programs.

Second, the Department finds the structure of the cancer benefit to be misleading and potentially deceptive. While pets may enroll in the Fixed Care Plan after age 10, cancer coverage is entirely excluded for those pets, meaning that consumers may reasonably believe they are purchasing cancer protection when, in fact, the benefit is unavailable solely due to enrollment age. This design creates a substantial risk of consumer misunderstanding and is inconsistent with principles of fair and non misleading insurance practices.

Third, the program imposes highly restrictive rules—including prohibiting coverage upgrades after enrollment and limiting consumers to only three preset benefit packages. These constraints materially reduce consumer choice and increase the likelihood that policyholders will not fully understand the limitations of the product. Such restrictions must be disclosed with absolute clarity, yet the filing does not provide adequate justification or consumer protection safeguards.

Taken together, these issues create a program that is overly restrictive, confusing to consumers, and potentially unfairly discriminatory. A pet that qualifies for more than one program should not be denied access to broader coverage based on unclear or unjustified eligibility distinctions. Because the filing fails to meet statutory and regulatory requirements and presents a meaningful risk of consumer harm, the Department rejects this filing as incomplete.

Additional deficiencies may exist beyond those identified here. The company is strongly advised to review all filing instructions thoroughly before resubmitting. If further clarification is needed after reviewing the instructions, the Department remains available to assist.