

1 Prospects and Challenges of Risk-Based Insurance Pricing for Disaster 2 Adaptation

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11 **Regulation of property insurance pricing involves trade-offs that will determine how**
12 **disaster risks impact households' budgets. Allowing prices to reflect property-specific**
13 **risks offers several benefits, but may cause a range of negative unintended**
14 **consequences associated with declines in coverage.**

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16 Rising losses from climate-related disasters are generating turmoil in property insurance
17 markets. In the United States, these developments are exposing the limits of pricing
18 regulations that suppressed premiums in many high-risk areas. State-level pricing constraints
19 for homeowners insurance are increasingly met through insurer retreat from higher-risk
20 markets. Meanwhile in the National Flood Insurance Program (NFIP), which is the primary
21 provider of flood coverage, years of premiums below expected losses have required repeated
22 borrowing, leaving roughly \$22 billion in outstanding debt by 2025. In response, premiums
23 in both systems are being allowed to rise and better reflect property-specific disaster risk; we
24 refer to this shift as “risk-based pricing.”

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26 The shift towards risk-based pricing by the NFIP and state regulators aims to serve two
27 distinct goals: preserving insurer solvency and insurance availability in private markets and
28 promoting climate adaptation in the housing sector. By aligning prices with underlying
29 hazards, risk-based pricing can reward investments in risk reduction and discourage
30 development in high-exposure areas. It also acts as a risk signal by making the cost of
31 climate risk more visible to homeowners, thus encouraging more informed decisions about
32 where to live and how much to invest in adaptation.^{1,2}

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34 However, risk-based pricing cannot meet these goals when implemented as an isolated
35 policy. When rates increase, low-income households are more likely to drop or reduce their
36 coverage rather than invest in risk reduction, which leaves them financially vulnerable in the
37 wake of disasters. The effectiveness of risk-based pricing in promoting adaptation depends
38 on targeted measures that help low-income households respond to rising premiums, as well
39 as complementary housing policies that address the structural limits of insurance contracts in
40 promoting adaptation.

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2 This Comment discusses the policies that can support risk-based pricing and promote
3 adaptation in the housing sector. Although climate-related insurance challenges are global,
4 we focus here on the United States, where detailed evidence provides insights into broader
5 emerging tensions between insurance, affordability, and adaptation.
6

7 **Risk signals only work if households can act on them**

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9 Insurance premiums convey information about expected disaster losses and can incentivize
10 households to reduce exposure through home retrofits or relocation. Yet even when
11 premiums accurately reflect disaster risk, many households face financial barriers that limit
12 their ability to invest in costly risk-reduction measures such as replacing roofs to withstand
13 wind, elevating foundations to reduce flood risk, or creating defensible space to lower
14 wildfire exposure. Nearly half of U.S. households in the lowest income quintile are
15 homeowners, who may not be able to afford the upfront costs associated with risk-reduction
16 measures. Consistent with this constraint, the limited evidence to date suggests that demand
17 for adaptation is more responsive to prices among the wealthy.^{3,4}

18 Similarly, price signals may have limited effects on households' location decisions. While
19 higher premiums may discourage development in high-risk areas, new construction is a small
20 fraction of the housing stock. For most homeowners, relocation as a strategy to lower
21 premiums is rarely a feasible or attractive option. Employment constraints, limited housing
22 availability, and the value of local social networks all reduce household mobility. The
23 literature points to existing but limited migration in response to rising premiums,⁵
24 underscoring the high costs of relocation.
25

26 **Targeted subsidies can soften risk-based pricing impacts**

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28 Instead of encouraging risk-reduction, risk-based pricing may lead to a decline in coverage,^{6,7}
29 particularly among lower-income households. Underinsurance increases disaster
30 vulnerability through slower recovery, falling property values, and negative spillovers in the
31 local economy.⁸ For mortgaged households who cannot reduce their coverage, higher
32 premiums may raise the risk of mortgage default and prepayment, echoing dynamics seen
33 with adjustable-rate mortgages in the lead up to the 2008 financial crisis.⁵
34

35 Targeted, publicly-provided subsidies for lower-income households (for insurance premiums,
36 home retrofits, or relocation) can help address the negative consequences of underinsurance
37 by improving coverage and reducing exposure. They can also support market stability by
38 maintaining a more diverse and solvent risk pool, especially if these subsidies lead to
39 meaningful investments in risk reduction. These subsidies could partly pay for themselves by

1 reducing reliance on other safety net programs, which often exceeds the direct cost of federal
2 disaster aid.⁹

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4 However, the optimal design and fiscal implications of such subsidies remain uncertain. To
5 date, there is limited research comparing the long-run costs and benefits of ex ante subsidies
6 with those of post-disaster assistance. There is also limited research on the effects of means-
7 tested insurance subsidies on induced risk-taking behavior (“moral hazard”): while low-
8 income households often locate in hazardous areas due to affordability constraints rather than
9 due to positive amenities^{10,11}, insurance subsidies could, in principle, induce some
10 households to locate in higher risk areas. Quantifying these tradeoffs between affordability
11 and moral hazard should be a priority for future work.

12
13 Targeted subsidies also have limits. They can be expensive to sustain at scale, especially as
14 climate risk grows, which might require stringent eligibility rules. In addition, means-tested
15 subsidies are an imperfect approach for increasing insurance coverage. Even when costs are
16 lowered, several frictions limit demand, such as administrative hurdles, informational
17 deficiencies, and cognitive biases. Finally, while public programs such as the NFIP can
18 ensure subsidies reach households, the incidence is less predictable in private markets. Where
19 competition is limited, insurers may offset subsidies via premium increases, requiring
20 oversight to ensure consumer benefit.

21 **Premiums have limited power to drive adaptation in housing**

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23 Risk-based pricing can support climate adaptation, especially when combined with targeted
24 subsidies. But its effectiveness is constrained by structural features of insurance contracts,
25 warranting realistic expectations about what insurance pricing alone can achieve.

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27 First, insurance contracts are typically renewed annually, while disaster risks evolve over
28 decades. This temporal mismatch limits the ability of insurance prices to influence long-term
29 decisions about where to build and how to retrofit structures expected to last a century or
30 more.

31 Second, adaptation often requires collective action and large upfront investment. For
32 example, wildfire risk depends not only on individual defensible space but also on
33 neighborhood-wide fuel management, while managing flood risk may require levees or
34 public drainage infrastructure. NFIP’s Community Rating System links community actions to
35 premium discounts, illustrating how pricing can support shared investments. Private markets
36 are unlikely to coordinate these efforts, but state insurance regulators can support collective
37 action by requiring transparent, consistent discounts for verified interventions.

1 Third, pricing disaster risk is complex. Insurers use different catastrophe models, which vary
2 across vendors and are often opaque to consumers and regulators. As a result, premiums may
3 reflect model artifacts and uncertainty as much as underlying risk, undermining alignment
4 with actual exposure.¹²⁻¹⁴ Florida’s Commission on Hurricane Loss Projection Methodology
5 has a formal review process, and California recently completed its first wildfire model
6 review. Elsewhere, models often inform rates with limited oversight.

7 While aligning insurance premiums with risk is important for market stability, it cannot
8 substitute for other policy tools needed to address the multiple market failures and budget
9 constraints that limit widespread adaptation. These include long-term planning incentives
10 through zoning and building codes, public efforts to improve the accuracy and transparency
11 of disaster risk information, and investments in protective infrastructure to reduce physical
12 exposure.

13 14 **Conclusion**

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16 The U.S. housing system redistributes the costs of disaster risks implicitly and often
17 inefficiently through programs not designed for climate shocks. Public insurance programs
18 and state-level pricing regulations shift risk across households without regard to income or
19 vulnerability, distorting economic incentives without improving outcomes for lower-income
20 households or strengthening insurer solvency.

21 Ensuring both affordability and stability requires approaches that continue the expansion of
22 risk-based pricing while supporting coverage and adaptation among those with limited
23 capacity to respond to rising premiums. A key challenge for future research is identifying the
24 income thresholds where risk-based pricing no longer incentivizes adaptation but instead
25 creates financial distress and coverage gaps.

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27 Broader insurance pricing reforms may also be considered. While investments in home
28 hardening can reduce future damage, they do not always translate into meaningful insurance
29 savings. Only 14 states mandate that insurers offer discounts for properties with specific
30 disaster protections. Yet in many cases, the precise discount amount is left to the insurer, and
31 the discounts are also often too small to offset retrofits and verification costs.¹⁵ Broadening
32 the requirements for explicit and actuarially-based discounts for home hardening could
33 improve the effectiveness of risk-based pricing.

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36 At a systemic level, a national reinsurance program could lower costs for primary insurers by
37 covering extreme losses, reducing solvency risk, and reducing pressures on premiums in

1 high-risk areas. International models offer proven examples: France, Spain, and Japan’s
2 Reinsurance scheme all demonstrate how public reinsurance can enhance market stability
3 under rising disaster risk. Getting insurance prices right is an important step towards a
4 resilient housing sector, but even accurate pricing must be complemented by long-term
5 policy tools.

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17 18 **References**

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