



June 5, 2025

Laura Grimm
Chief of Staff
National Oceanic and Atmospheric Administration
U.S. Department of Commerce

Re: [Billion Dollar Weather and Climate Disasters Retirement](#)

Dear Acting Administrator Grimm,

On behalf of the American Academy of Actuaries (Academy),¹ we appreciate the opportunity to share our concern about the likely ramifications of retiring NOAA's Billion Dollar Weather and Climate Disasters database (Database). The Academy would strongly encourage the National Oceanic and Atmospheric Administration (NOAA) to reconsider retiring this valuable and heavily utilized dataset and, instead, reinstate its support.

The Database is a resource utilized by insurers, reinsurers, actuaries, and state and local level decisionmakers in planning for and mitigating the damage and costs of future extreme weather events. The loss of this data will stifle research and progress on mitigation efforts, which are used to prevent or limit losses to property while keeping individuals and communities safe. Furthermore, this data loss will likely make catastrophe modeling and effective insurance pricing more difficult, at the risk of exacerbating the problem of insurance availability and affordability that is already seen in some parts of the country.

While it is true that the historical data will be preserved, the continuity of data collection going forward is now in jeopardy. If collection methods are replicated, there are concerns that the data will only be available through paid subscriptions. Further, while public data collection and aggregation methods are subject to review and the methodologies are public, this transparency may disappear behind paywalls. If the data becomes very expensive, the added cost could shrink the pool of researchers. Public datasets also support research and focus on the so-called "big" questions, like climate impacts. This in turn benefits and supports a network of many minds—at the individual and institutional levels—who work to quantify and qualify those impacts, finding solutions to real-world implications and having immediate and long-term, positive impact on communities.

The actuarial profession, in particular, finds great value in the Database and uses it frequently in the work we do to support the profession, the insurance industry, academia, and public policy. For instance, the Academy relies heavily on the Database for the [Actuaries Climate Risk Index](#), which seeks to answer the question, "Are the extreme weather conditions that result from a changing climate producing increased

¹ The American Academy of Actuaries is a 20,000-member professional association whose mission is to serve the public and the U.S. actuarial profession. For 60 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

property losses?” More recently, the Casualty Actuarial Society² published a report using the Database in April, [Developing Rates for the Severe Convective Storm Peril in Property Insurance](#). The loss of the Database could impair our profession's efforts to ensure that financial security systems in the United States be sound and sustainable. Beyond the practical applications that actuaries have for the Database, we would also note that FEMA's National Risk Index uses the dataset. Retiring the Database will cause that index, another valuable resource for public and private planning to mitigate risks, to either deteriorate or be discontinued.

Few quality public datasets capture the financial losses associated with these large catastrophic events. The Database is also unique in that it collects data from seven different kinds of disasters in one place. While there are limitations to the Database, its simplicity in approach to the data makes it easier to understand, helping to provide guidance to decisionmakers, both domestically and internationally. The data in the Database is superior to most other estimates, as NOAA staff gain insights from a wide range of stakeholders—both public and private—and curate these estimates with unusual knowledge and care.

We strongly object to the retirement of the Database and urge you to reinstate NOAA's support. If you have any questions or would like to discuss these comments further, please contact Rob Fischer, the Academy's policy project manager, casualty (fischer@actuary.org).

Sincerely,

Susan Kent, MAAA, FCAS
Vice President, Casualty Practice Council

Steve Malerich, MAAA, FSA
Vice President, Risk Management and Financial Reporting Council

Grace Lattyak, MAAA, EA, FCA, FSA
Chairperson, Research Committee

² The Casualty Actuarial Society (CAS) is a leading international organization for credentialing and professional education. Founded in 1914, the CAS is the world's only actuarial organization focused exclusively on property and casualty risks and serves over 10,000 members worldwide. CAS members are experts in property and casualty insurance, reinsurance, finance, risk management, and enterprise risk management. Professionals educated by the CAS empower business and government to make well-informed strategic, financial and operational decisions.