



Illinois Department of Insurance

JB PRITZKER
Governor

ANN GILLESPIE
Director

TO: All Illinois Licensed Insurers

FROM: Ann Gillespie, Director 

DATE: June 27, 2025

RE: Company Bulletin 2025-11 – Climate Risk Disclosure Survey

In cooperation with chief insurance regulators from American Samoa, Arizona, California, Colorado, Connecticut, Delaware, District of Columbia, Guam, Hawaii, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Hampshire, New Jersey, New Mexico, New York, Northern Mariana Islands, Oregon, Pennsylvania, Puerto Rico, Rhode Island, US Virgin Islands, Vermont, Virginia, Washington, and Wisconsin, the Illinois Department of Insurance is conducting the Climate Risk Disclosure Survey for Reporting Year 2024.

For the current survey, Reporting Year 2024, all participating insurers are required to report using the Task Force on Climate related Financial Disclosure (TCFD)-aligned NAIC Climate Disclosure Risk Survey. For reporting year 2023, more than 1,700 companies responded to the Survey, capturing over 85% of the entire U.S. insurance market. For guidance on the specific survey sections and questions, reference the [NAIC Climate Risk Disclosure Survey document](#). All insurance companies who are licensed in the State of Illinois and who collected direct written premium amounts of more than \$100 million dollars nationwide during 2024 must respond to the survey.

The completed survey responses are due August 29, 2025. Please register and submit your survey responses to the Department by going to the [survey registration on the interactive web application](#) and following the registration and submission instructions. Insurance companies have to submit the TCFD-aligned Climate Risk Disclosure Survey through a PDF document. Companies can use the Survey Questions document attached to furnish their responses or upload their own TCFD-aligned report. **All responses should be self-contained within a single document, rather than a link to a public report.**

Companies within the same group whose policies and practices are the same and whose answers would not be materially different from each other may submit uniform group responses. **When submitting group responses, please be certain to check the premium amounts for each individual company in the group that you are responsible for and submit a document for each company with more than \$100 million in direct written premium nationwide.**

In addition to the narrative Climate Risk Disclosure Survey, we ask companies to consider responding to the following voluntary closed-ended (Y/N) questions on this [SurveyMonkey link](#). The voluntary closed-ended questions align with the NAIC Climate Risk Disclosure Survey. Closed-ended questions are voluntary and individual states may elect not to request them.

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We have also provided a series of webinars on this Survey to build knowledge and capacity within the insurance sector and insurance companies. You can find the webinars archived at the [Climate Risk and Resiliency Resource Center](#). We believe that these webinars will offer an excellent opportunity for participants to enhance their understanding of climate risk disclosure practices and gain practical knowledge on how to improve their own reporting.

Questions regarding this Company Bulletin should be directed to: DOI.InfoDesk@illinois.gov

Attachment: [NAIC Climate Risk Disclosure Survey_TCFD-Aligned Questions](#)

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