

Date: 11/11/25

Virtual Meeting

NAIC/AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS (E) WORKING GROUP

December 1, 2025

2:00 – 3:00 p.m. ET / 1:00 – 2:00 p.m. CT / 12:00 – 1:00 p.m. MT / 11:00 a.m. – 12:00 p.m. PT

ROLL CALL

Doug Stolte, Chair	Virginia	Andrea Johnson	Nebraska
Diana Sherman, Vice Chair	Pennsylvania	Ned Cataldo	New Hampshire
Laura Clements	California	David Cook/Mark Boston	Ohio
Rylynn Brown	Delaware	Ryan Keeling	Oregon
Kevin Clark	Iowa	Johanna Nickelson	South Dakota
Kristin Hynes	Michigan	Jake Garn	Utah
Shannon Schmoeger	Missouri		

NAIC Support Staff: Bruce Jenson

AGENDA

1. Discuss and Consider Adoption of Updated Sound Practice Documents Related to Workpaper Access—*Doug Stolte (VA)*
 - a. Four Step Process to Obtain Access to CPA Workpapers Attachment A
 - b. Best Practices: Insurance Regulator Access to Audit Documentation Attachment B
2. Discuss Plans for an Educational Webinar for National Firm Reps – *Doug Stolte (VA)*
3. Any Other Matters—*Doug Stolte (VA)*
4. Adjournment

[https://naiconline.sharepoint.com/teams/FRSSolvencyMonitoring/NAICAICPA WG/2025/12-1-25 NAIC-AICPA WG Agenda.docx](https://naiconline.sharepoint.com/teams/FRSSolvencyMonitoring/NAICAICPA%20WG/2025/12-1-25%20NAIC-AICPA%20WG%20Agenda.docx)

AICPA Four-Step Process for Use by Regulators

The NAIC/AICPA Working Group supports the AICPA's four-step process described below for regulators who are experiencing difficulty in obtaining access to CPA workpapers, have questions with respect to the CPA's individual engagement to perform a statutory audit, or have concerns about the work performed by the CPA. For additional information and best practices in this area, please see the AICPA's "Best Practices: Insurance Regulator Access to Audit Documentation" publication.

The financial regulator should initially work through the company to obtain access to the work papers of the company's external auditor. Should the financial regulator deem additional action is required in obtaining access to the audit workpapers, after informing the appropriate management, it is suggested that the financial regulator contact the following individuals in this suggested order while keeping the company informed of ongoing developments, as needed:

1. The engagement partner
2. The designated national Firm representative (see **Attachment A** for a current listing of contacts for participating firms)
3. Chair of the insurer's Audit Committee
4. State Board of Accountancy, Ethics (or Qualitative Review) Committee, or other regulatory bodies deemed appropriate

The AICPA process, excepting step 4, would be informal, non-authoritative, and non-binding. The process is intended to be additive to the current remedies available to regulators. The benefits of the additive process is to help enhance communication between regulators and independent certified public accountants, improve the effectiveness of obtaining access to audit working papers on a timely basis, and assist in strengthening the quality of statutory audits. The AICPA is committed to continually communicating to practitioners the requirement per Section 13: *Definition, Availability and Maintenance of the Independent Certified Public Accountants Work Paper*, of the NAIC Model Audit Rule, to provide access to audit working papers and audit related correspondence as defined by statute or regulation.

In 2022, the NAIC/AICPA Working Group voted to adopt an optional Contract Examiner Attestation Template to notify the CPA firm of contracted individuals participating in the statutory examination that should receive access to audit workpapers. The template has been included here as **Attachment B**.

Attachment A – National Accounting Firm Representatives
(Updated as of 10/28/25)

Firm Name	Contact Person	Email	Phone #
Aprio LLP	Nathan Robnett	nathan.robnett@aprio.com	405.410.7597
Armanino LLP	Todd Goldenhersh	todd.goldenhersh@armanino.com	314.983.1205
Baker Tilly US LLP	Daniel E. Buttke	Daniel.buttke@bakertilly.com	920.739.3348
Bauknight, Pietras & Stormer PA	Bryan Hudson	bhudson@bps.cpa	803.771.8943
BDO USA PA	Nicole Sioson	nsioson@bdo.com	703.351.4225
Brown Plus	Scott Esworthy	scottesworthy@brownplus.com	717.761.7171
Buffamante Whipple Buttafaro PC	Mike D. Staley	mds@bwbcpa.com	716.701.7642
Cain Ellsworth & Company LLP	Abby De Zeeuw	adezeeuw@cainellsworth.com	712.324.4614
Carr, Riggs & Ingram LLC	Joseph May	jmay@criadv.com	601.853.7050
Cherry Bekaert LLP	Adriana Ponce Cain	aponce@cbh.com	904.718.2464
CliftonLarsonAllen LLP	Dan Bauer	dan.bauer@claconnect.com	612.215.1807
Crowe LLP	Arthur M. Salvadori	Arthur.Salvadori@crowe.com	860.470.2117
Deloitte & Touche LLP	Josh Martin	joshmartin@deloitte.com	860.725.3153
Eide Bailly LLP	Ryan Donahue	rdonahue@eidebailly.com	701.476.8826
EisnerAmper LLP	Dianne Batistoni	Dianne.batistoni@eisneramper.com	732.243.7220
Ernst & Young LLP	Dave Osborn	Dave.osborn@ey.com	708.990.0137
Forvis Mazars LLP	James Garner	Jim.garner@us.forvismazars.com	214.505.4368
Grant Thornton LLP	Dana Wilson	Dana.wilson@us.gt.com	860.781.6703
JLK Rosenberger LLP	Bill Rosenberger	brosenberger@jlkrlp.com	818.334.8624
Johnson Lambert LLP	Lauren Darr	ldarr@johnsonlambert.com	919.719.6412
JRBT PC	Diana Ward	Diana_ward@jrbt.com	254.761.1624
Kerber, Eck & Braeckel LLP	Phil Capps	philc@kebcpa.com	217.535.4245
KPMG LLP	Olga Roberts	olgaroberts@kpmg.com	203.247.6796
LBMC PC	Paul W. Demastus	Paul.demastus@lbmc.com	615.309.2229
Plante & Moran PLLC	John Fritz	John.Fritz@plantemoran.com	312.980.3354
PricewaterhouseCoopers LLP	Jon Mattera	jon.mattera@pwc.com	516.661.7066
RSM US LLP	Nate Seacrist	Nate.seacrist@rsmus.com	216.622.1093
Shores, Tagman, Butler & Company PA	Spenser Budde	sbudde@shorescpa.com	407.872.0744 ext. 202
Stroh Ballweg LLP	Tom Dawson	tdawson@strohmballweg.com	608.821.6308
Thomas Howell Ferguson PA	Christopher Howell	chowell@thf-cpa.com	850.321.3135
Wipfli LLP	John Erwin	john.erwin@wipfli.com	470.342.6044

Firms with multiple offices performing statutory audits of regulated insurance entities that wish to designate or update their national firm representative should contact NAIC representatives at financialexams@naic.org.

Attachment B – Contract Examiner Attestation Template [Optional]

The purpose of this Attestation is to establish that the following personnel were retained by [DEPARTMENT OF INSURANCE] pursuant to the authority provided in [INSERT CITATION FOR ADOPTION OF MODEL LAW ON EXAMINATIONS #390 § 4D]. The personnel are working on a contract basis as examiners and should be provided access to external audit workpapers as they are subject to the confidentiality requirements provided in [INSERT CITATION FOR ADOPTION OF MODEL LAW ON EXAMINATIONS #390 § 5]:

Name	Title	Contract Firm

Contract personnel are bound in writing to maintain the statutory confidentiality of examination workpapers. They have agreed to use such workpapers solely in connection with the examination project for which they are contracted. Contract personnel are prohibited from disclosing or transmitting the confidential material except as expressly authorized by the Department.

In accordance with [INSERT CITATION FOR ADOPTION OF ANNUAL FINANCIAL REPORTING MODEL REGULATION #205], every insurer required to file an audited financial report shall require the accountant to make available for review by Insurance Department examiners, all work papers prepared in the conduct of the accountant's audit and any communications related to the audit between the accountant and the insurer.

[OPTIONAL: In addition, Contract personnel have been informed that any exploitation of confidential materials for purposes of a competitive advantage will constitute a breach of contract.]

The undersigned represents that (s)he has duly executed this Attestation, for and on behalf of _____; that (s)he is the _____ (Title) of _____ and that (s)he is authorized to execute and file such document. The undersigned further represents that (s)he is familiar with such document and the contents thereof, and that the facts therein set forth are true to the best of his/her knowledge, information and belief.

[Signature of Authorized Individual]

[Printed Name]
[Title]
[Date]



AICPA NAIC Task Force

Best Practices: Insurance Regulator Access to Audit Documentation

November 17, 2025

This document is an other auditing publication, as defined in AU-C section 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance With Generally Accepted Auditing Standards (AICPA, Professional Standards)*. Other auditing publications have no authoritative status; however, they may help the auditor understand and apply generally accepted auditing standards. In applying the auditing guidance included in an other auditing publication, the auditor should, exercising professional judgment, assess the relevance and appropriateness of such guidance to the circumstances of the audit. The auditing guidance in this document has been reviewed by the AICPA Audit and Attest Standards staff and published by the AICPA and is presumed to be appropriate. This document has not been approved, disapproved, or otherwise acted on by a senior technical committee of the AICPA.

Best Practices: Insurance Regulator Access to Audit Documentation

NAIC Model Audit Rule

Section 13: *Definition, Availability and Maintenance of the Independent Certified Public Accountants Work Papers*, of the NAIC Model Audit Rule (“MAR”) defines audit workpapers and requires that independent certified public accountants (external auditors) provide access to or copies of audit documentation when requested by insurance regulators. That guidance is as follows:

Workpapers are the records kept by the independent certified public accountant of the procedures followed, the tests performed, the information obtained, and the conclusions reached pertinent to the accountant’s audit of the financial statements of an insurer. Workpapers, accordingly, may include audit planning documentation, work programs, analyses, memoranda, letters of confirmation and representation, abstracts of company documents and schedules or commentaries prepared or obtained by the independent certified public accountant in the course of his or her audit of the financial statements of an insurer and which support the accountant’s opinion.

Every insurer required to file an audited financial report pursuant to this regulation, shall require the accountant to make available for review by insurance department examiners, all workpapers prepared in the conduct of the accountant’s audit and any communications related to the audit between the accountant and the insurer, at the offices of the insurer, at the insurance department or at any other reasonable place designated by the commissioner. The insurer shall require that the accountant retain the audit workpapers and communications until the insurance department has filed a report on examination covering the period of the audit but no longer than seven (7) years from the date of the audit report.

In the conduct of the aforementioned periodic review by the insurance department examiners, it shall be agreed that photocopies of pertinent audit workpapers may be made and retained by the department. Such reviews by the department examiners shall be considered investigations and all working papers and communications obtained during the course of such investigations shall be afforded the same confidentiality as other examination workpapers generated by the department.

Generally Accepted Auditing Standards

Interpretation No. 1, “Providing Access to or Copies of Audit Documentation to a Regulator,” of AU-C Section 9230, *Auditing Interpretations of Section 230*, contains the following

interpretation^{fn 1} related to providing access to or copies of audit documentation to a regulator:

.01 Question—Paragraph .19 of section 230, *Audit Documentation*, states that “the auditor should adopt reasonable procedures to maintain the confidentiality of client information.” However, auditors are sometimes required by law, regulation, or audit contract^{fn2} to provide a regulator, or a duly appointed representative, access to audit documentation. For example, a regulator may request access to the audit documentation to fulfill a quality review requirement or to assist in establishing the scope of a regulatory examination. Furthermore, as part of the regulator’s review of the audit documentation, the regulator may request copies of all or selected portions of the audit documentation during or after the review. The regulator may intend, or decide, to make copies (or information derived from the audit documentation) available to others, including other governmental agencies, for their particular purposes, with or without the knowledge of the auditor or the client. When a regulator requests the auditor to provide access to (and possibly copies of) audit documentation pursuant to law, regulation, or audit contract, what steps may the auditor take?

.02 Interpretation—When a regulator requests access to audit documentation pursuant to law, regulation, or audit contract, the auditor may take the following steps:

- a. Consider advising the client that the regulator has requested access to (and possibly copies of) the audit documentation and that the auditor intends to comply with such request.^{fn3}

^{fn1} In accordance with paragraph .27 of AU-C section 200, the auditor should consider applicable interpretive publications in planning and performing the audit. Paragraph .A86 of AU-C section 200 states that, “[i]nterpretive publications are not auditing standards. Interpretive publications are recommendations on the application of GAAS in specific circumstances, including engagements for entities in specialized industries. An interpretive publication is issued under the authority of the ASB after all ASB members have been provided an opportunity to consider and comment on whether the proposed interpretive publication is consistent with GAAS. Auditing interpretations of GAAS are included in AU-C sections. AICPA Audit and Accounting Guides and auditing SOPs are listed in AU-C appendix D, *AICPA Audit and Accounting Guides and Statements of Position*.”

^{fn2} Footnote 3 of Paragraph .01 of AU-C section 9230 states:

Paragraphs .11–.15 of this interpretation address situations in which the auditor is not required by law, regulation, or audit contract to provide a regulator access to the audit documentation.

^{fn3} Footnote 4 of Paragraph .02(a) of AU-C section 9230 states:

The auditor may wish (and in some cases may be required by law, regulation, or audit contract) to confirm in writing with the client that the auditor may be required to provide a regulator access to the audit documentation. Sample language that may be used follows:

- b. Make appropriate arrangements with the regulator for the review.
- c. Maintain control over the audit documentation, and
- d. Consider submitting the letter described in paragraph .05 of this interpretation to the regulator.

.03 Making appropriate arrangements with the regulator may include establishing the specific details such as the date, time, and location of the review. The audit documentation may be made available to a regulator at the offices of the client, the auditor, or a mutually agreed-upon location. However, maintaining control of audit documentation is necessary in order for the auditor to maintain the integrity of the audit documentation and the confidentiality of client information. For example, the auditor (or the auditor's representative) may be present when the audit documentation is reviewed by the regulator.

.04 Ordinarily, the auditor may not agree to transfer ownership of the audit documentation to a regulator. Furthermore, the auditor may not agree, without client authorization, that the information contained therein about the client may be communicated to or made available to any other party. In this regard, the action of an auditor providing access to, or copies of, the audit documentation shall not constitute transfer of ownership or authorization to make them available to any other party.

.05 An audit performed in accordance with generally accepted auditing standards is not intended to, and does not, satisfy a regulator's oversight responsibilities. To avoid any misunderstanding, prior to allowing a regulator access to the audit documentation, the auditor may submit a letter to the regulator that

- a. sets forth the auditor's understanding of the purpose for which access is being requested;
- b. describes the audit process and the limitations inherent in a financial statement audit;

The audit documentation for this engagement is the property of *[name of auditor]* and constitutes confidential information. However, we may be requested to make certain audit documentation available to *[name of regulator]* pursuant to authority given to it by law or regulation. If requested, access to such audit documentation will be provided under the supervision of *[name of auditor]* personnel. Furthermore, upon request, we may provide copies of selected audit documentation to *[name of regulator]*. The *[name of regulator]* may intend, or decide, to distribute the copies or information contained therein to others, including other governmental agencies.

- c. explains the purpose for which the audit documentation was prepared, and that any individual conclusions must be read in the context of the auditor's report on the financial statements;
- d. states, except when not applicable, that the audit was not planned or conducted in contemplation of the purpose for which access is being granted or to assess the entity's compliance with laws and regulations;
- e. states that the audit and the audit documentation should not supplant other inquiries and procedures that should be undertaken by the regulator for its purposes;
- f. requests confidential treatment under the Freedom of Information Act or similar laws and regulations,^{fn4} when a request for the audit documentation is made, and that written notice be given to the auditor before transmitting any information contained in the audit documentation to others, including other governmental agencies, except when such transfer is required by law or regulation; and
- g. states that if any copies are to be provided, they will be identified as "Confidential Treatment Requested by [*name of auditor, address, telephone number*]."

The auditor may obtain a signed acknowledgment copy of the letter as evidence of the regulator's receipt of the letter.

Considerations

The regulatory standards in Section 13 of the MAR outlined above indicate that "Workpapers, accordingly, may include audit planning documentation, work programs, analyses, memoranda, letters of confirmation and representation, abstracts of company documents and schedules or commentaries prepared or obtained by the independent certified public accountant in the course of his or her audit of the financial statements of an insurer and which support the accountant's opinion." Some regulators have experienced issues gaining access to certain workpapers due to proprietary information or client privilege. As a reminder, in accordance with Section 13 of the MAR as outlined above, every insurer "shall require the accountant to make available for review by insurance department examiners, all workpapers prepared in the conduct of the accountant's audit."

Although Section 13 of the MAR requires that external auditors provide "photocopies" of their workpapers, in response to requests from insurance regulators, some external auditors have at times satisfied this regulatory requirement by providing audit workpapers in non-

^{fn4} Footnote 5 of Paragraph .05(f) of AU-C section 9230 states:

The auditor may need to consult the regulations of individual agencies and, if necessary, consult with legal counsel regarding the specific procedures and requirements necessary to gain confidential treatment.

photocopy formats, including electronic copies of workpapers in a Portable Document Format (“PDF”) (i.e., the native files have been converted to PDF). Notwithstanding the limit of the regulatory requirement to provide photocopies of audit workpapers, regulators have expressed a view that the provision of some workpapers (e.g., Excel spreadsheets) as a photocopy or in an electronic format such as a fully secured PDF is not sufficient for their purposes due to an inability to view certain information, such as:

1. Information included in hidden columns or rows that can only be reviewed in native format.
2. Information embedded in formulas or comment boxes that can only be reviewed in native format.
3. Information that is difficult to use due to formatting issues associated with generation of PDF documents (e.g. illegible font sizes, large spreadsheets breaking over many pages, etc.).

Because of the inability to access and use information contained in electronic workpapers when presented in PDF form, regulators have asked the AICPA NAIC Task Force to suggest potential accommodations for regulator access to audit documentation. Refer to the Best Practices section below for information.

Although paragraph .05 of Interpretation No. 1 of AU-C section 9230, referenced above, recommends submitting a letter to the regulator that communicates expectations of the regulator’s use of audit documentation before allowing access to audit workpapers, there may be situations in which the regulator is unable to acknowledge or sign the letter, particularly if the language included in the letter differs from that provided above. In situations in which the regulator does not acknowledge or sign the letter, the external auditor would need to consider other options for communicating expectations and requests to the regulator when providing access to the workpapers, such as documenting that the letter was submitted to or discussed with the regulator.

Best Practices

The following list of best practices to be considered by both the external auditor and insurance regulators attempts to balance regulators’ needs, efficiency of the regulatory examination (examination), the ability of auditors and companies to prevent access to auditors’ workpapers by unauthorized persons, and the requirement for external auditors to maintain control over audit documentation as required by generally accepted auditing standards. These best practices are not meant to and do not change the scope of the actual regulatory requirements incumbent on audit firms, which are contained in each state’s laws or regulations.

External Auditors:

The following are suggested actions for the external auditor to consider when regulators request access to audit documentation:

- **Workpaper Access** – At the outset of the examination, provide the insurance regulators with timely, secure, remote access to the audit workpapers and make appropriate staff available to address questions.
 - Continue to make access to workpapers available to regulators throughout the examination, upon request.
- **Workpaper Format** – To the extent that the workpapers are requested by the insurance regulators in a common native format (i.e., the original file format associated with widely available commercial word processing or spreadsheet software, such as Microsoft Word or Excel) as opposed to, or in addition to, converting to PDF, determine whether additional security measures are appropriate such as password protection to access the secure site that contains the workpaper copies.
 - Insurance regulators strongly discourage password protection directly on individual workpapers to avoid usability and efficiency issues.
- **Disclosure** – When providing regulators with workpapers, include a disclosure letter as outlined above stating that original workpapers are maintained/owned by the external auditor, and that the external auditor expressly disclaims any responsibility for any alteration of files, reports which may be created from such files such as additional test items added to an insurer's or auditor's Excel spreadsheet, and any reliance which may be placed on such alterations to the workpaper files.

Insurance Regulators:

The following are suggested actions for the insurance regulator to consider when requesting access to audit documentation:

- **Notification** – Encourage the insurer under examination to notify the external auditor of the upcoming examination to provide sufficient time in advance of the start of field work of the examination, so that the firm can prepare its audit workpapers for sharing.
 - Keep the audit timeline in mind when requesting access to workpapers, as the external auditor may not release workpapers until the audited financial statements and related workpapers have been finalized.
- **Meeting** – Hold a planning meeting with relevant engagement team members of the external auditor to facilitate the workpaper access and review process, including gaining an understanding of:
 - The audit approach and organization of electronic workpapers
 - Key risk areas
 - Expected reliance on controls

- Timing of external audit tests of controls and
- Access to and availability of workpapers throughout the exam
- **Scope** – Consider the scope of what workpapers are necessary for the examination by reviewing the audit workpapers before requesting copies (photocopies, PDF and/or native formats) of any workpapers. In particular, consider whether a request for all workpapers without reviewing the audit files is necessary and efficient. To the extent electronic copies of audit workpapers in native format (e.g., Excel spreadsheets) might be preferable, recognize that such request goes beyond the regulatory requirements imposed by the law. However, the original workpaper must be legible in photocopy or PDF form.
- **Communication** – Communicate with the external auditor and local engagement team members on matters related to workpaper access and copies, before involving the national firm representative (if relevant) and the insurer^{fn5}.
- **Coordination** – For coordinated examinations involving more than one regulatory entity, coordinate amongst the various regulators to review all applicable legal entities’ workpapers at the same time.
 - When using contract resources to represent the insurance department, consider providing appropriate notification to the CPA firm of the contractor’s authorization to act on the department’s behalf. See Attachment B of the “AICPA Four-Step Process for Use by Regulators” publication on the NAIC website for a template that can be used for this purpose.

As stated in Section 13 of the MAR, the review by insurance department examiners of workpapers prepared by the independent certified public accountant in the conduct of the audit and any communications related to the audit between the independent certified public accountant and the insurer shall be considered investigations and all workpapers and communications obtained from the CPA firm during the course of such investigations shall be afforded the same confidentiality as other examination workpapers generated by the department.

^{fn5} In 2003 the AICPA/ NAIC Working Group (with assistance from the AICPA NAIC Task Force) developed and adopted a process, for external auditors and financial examiners related to access to audit documentation, that also included a list of individuals that the financial examiner should contact in the event of any issues. This information was included in the AICPA Audit Risk Alert – Insurance Industry Developments 2007/08 and has also been integrated into the NAIC’s Financial Examiners Handbook. That information is attached in Appendix A.

Appendix A

The AICPA/ NAIC Working Group (with assistance from the AICPA NAIC Task Force) has developed and adopted a process (below) for external auditors and financial examiners related to access to audit documentation that included a list of individuals that the financial examiner should contact in the event of any issues.

This information has been integrated into the NAIC's Financial Examiners Handbook. It was emphasized that this process is informal, non-authoritative, and non-binding. The AICPA NAIC Task Force envisions this process to be additive to the remedies available to insurance regulators. The benefits of this additive process would (1) help enhance communication between regulators and independent certified public accountants, (2) improve the effectiveness of obtaining access to audit workpapers on a timely basis, and (3) assist in strengthening the quality of statutory audits.

Reminder—Access to CPA Audit Documentation

An external auditor is required by Section 13 of the NAIC Model Audit Rule to provide timely access to or copies of audit documentation when requested by regulators.

Interpretation No. 1 of AU-C section 9230 addresses the responsibilities of an auditor when a regulator requests access to audit documentation.

The AICPA's task force on NAIC matters has worked actively with subgroups consisting of designated regulators and NAIC representatives to pursue ways to increase the examiners' reliance upon the statutory audit and use of underlying audit documentation.

The AICPA NAIC Task Force helped to establish the four-step process to provide a protocol for financial regulators who are having difficulty pursuing a resolution of (1) questions with respect to a firm's individual engagement to perform a statutory audit, (2) difficulties in gaining access to working papers, or (3) the regulator concerns about the work performed by the CPA. The financial regulator should initially work through the insurance company to obtain access to the work papers of the company's external auditor. If a financial regulator determines that an additional response is required, after informing appropriate management, it is suggested that the financial regulator contact the following individuals in this suggested order while keeping the company informed of ongoing developments, as needed:

1. The engagement partner
2. The designated national firm representative (see Attachment A of the “AICPA Four Step Process for Use by Regulators” document posted on the [NAIC website](#))
3. Chair of the insurer’s audit committee
4. State board of accountancy, ethics (or quality review) committee, or other regulatory bodies as deemed appropriate

Firms or individual practitioners performing statutory audits of regulated insurance entities that wish to designate a national firm representative and have not already done so should contact NAIC representatives at financialexams@naic.org.

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