

Draft date: 5/19/26

Virtual Meeting

BLANKS (E) WORKING GROUP

Thursday, May 28, 2026

12:00 – 1:00 p.m. ET / 11:00 a.m. – 12:00 p.m. CT / 10:00 – 11:00 a.m. MT / 9:00 – 10:00 a.m. PT

ROLL CALL

| | | | |
|---|----------------------|-------------------------------------|---------------|
| Roy Eft, Chair | Indiana | Tadd Wegner | Nebraska |
| Steve Drutz, Vice Chair | Washington | Paul Lupo | New Jersey |
| David Phifer | Alaska | Tracy Snow | Ohio |
| Kim Hudson | California | Ryan Rowe | Oklahoma |
| Wayne Shepherd | Connecticut | Ryan Keeling | Oregon |
| Nicole Brittingham | Delaware | Diane Sherman | Pennsylvania |
| N. Kevin Brown | District of Columbia | Shawn Frederick | Texas |
| Carolina Herrera Wagoner/ Shalice Rivers | Florida | Jake Garn | Utah |
| Daniel Mathis | Iowa | Justin E. Parr | West Virginia |
| Jason Tippet | Michigan | Adrian Jaramillo/ Michael Erdman | Wisconsin |
| Danielle Smith/Kelly Hopper | Missouri | | |

NAIC Committee Support: Mary Caswell/Jill Youtsey/Julie Gann

AGENDA

1. Consider Adoption of its March 5 Minutes—*Roy Eft (IN)* Attachment 1
2. Consider Adoption of Items Previously Deferred/Re-Exposed—*Roy Eft (IN)*
 - A. **2025-23BWG Modified** – Update the Separate Account Assets page by adding “Nonadmitted Assets” and “Net Admitted General Account Assets.” Add a new line on the Separate Account Summary of Operations for “Change in Nonadmitted Assets” within the surplus account. Insert a new page “Exhibit of Nonadmitted Assets” that will detail the current and prior total nonadmitted assets, and the change in nonadmitted assets. Attachment 2
 - B. **2025-24BWG** – Update Notes to Financial Statements Note 18B – ASC Plans for the disclosure clarifications in *Statement of Statutory Accounting Principles (SSAP) No. 47—Uninsured Plans*. Attachment 3
 - C. **2025-25BWG** – Update Notes to Financial Statements Note #2 – Accounting Changes and Corrections of Errors, by adding the reference to *Valuation* Attachment 4

Manual (VM)-20, Requirements for Principle-Based Reserves for Life Products.

- D. **2025-26BWG Modified** – Update the annual statement expense categories and instructions to remove outdated expense terminology and update to reflect the current types of expenses that exist for companies. Attachment 5
 - E. **2025-27BWG Modified** – Add a section to Life/Fraternal Asset Valuation Reserve (AVR) to report collateralized loan obligations (CLOs). Add a footnote to Schedule D, Part 1, Section 2 to report the book/adjusted carrying value (BACV) by NAIC designation for CLOs. Attachment 6
 - F. **2025-29BWG** – Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financial Statements Note 5L – Restricted Assets for reporting funds withheld and modified coinsurance (modco) arrangements. Attachment 7
3. Consider Adoption of Items Previously Exposed—*Roy Eft (IN)*
- A. **2026-01BWG** – Update Notes to Financial Statements Note #26 – Intercompany Pooling Arrangements to add instructions for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value. Attachment 8
 - B. **2026-02BWG Modified** – Update Notes to Financial Statements Note #11 – Debt to add a cross-check between Note #11B – FHLB Agreements and General Interrogatory #26. Attachment 9
 - C. **2026-03BWG Modified** – Update the Life/Fraternal Annual and Quarterly Blanks and Instructions (Exhibit 5, General Interrogatory lines 27.6 and 27.7, Supplemental Exhibits and Schedules, Variable Annuities Supplement) to clarify how companies should report valuation standards for VM-22, Requirements for Principles-Based Reserves for Non-Variable Annuities, business. Add an annual supplement for VM-22 reserve reporting. Attachment 10
 - D. **2026-04BWG Modified** – Add a section to Notes to Financial Statements Note #11 – Debt to disclose funding agreements backing special purpose vehicles (SPV) issuances (FABN). Add a footnote to Life Statement Exhibit 7 to report the amount of total funding agreements backed by SPV issuances. Attachment 11
 - E. **2026-05BWG** – Update the instructions to require explicit identification of instances where net asset value (NAV) is used by requiring direct reporting, rather than inference through omission, in the Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code column in Schedules D and BA. The updates require completion of this column for all reported items and restrict Attachment 12

reporting to indicators expressly permitted in the annual statement instructions.

- F. **2026-06BWG** – Update Notes to Financial Statements Note #5L(1) to add a reconciling adjustment line to the illustration to identify the assets pledged under multiple arrangements. Attachment 13
 - G. **2026-07BWG** – Add clarifying instruction to Schedule D, Part 1, Sections 1 and 2 for the payment due at maturity column and to specify what reporting categories should be included in this column. Add clarifying instructions to the origination balloon payment percentage column on Schedule D, Part 1, Section 2. For Schedule BA, Parts 1, 2, and 3, add clarification to the maturity date column to complete the column if the investment has a contractual stated maturity date. Attachment 14
 - H. **2026-08BWG Modified** – Add a code “O – Other” to the active status column on Schedule T for reporting entities that have a unique, restricted license type that does not fit into one of the other existing categories. Add a field to provide a description of the other license type, for example, captive insurers or international insurers. The proposal changes the “N – None of the Above” status code to “N – None,” as instances where the existing codes do not apply would now be reported through the “O – Other” status code. Attachment 15
 - I. **2026-09BWG** – Update the Five-Year Historical to add a line reporting short-term and cash equivalent affiliated investments. Attachment 16
 - J. **2026-10BWG** – Update Life/Fraternal Liability lines 24.03 and 24.07 to add reference to use the BACV and an annual crosscheck to Schedule S. Add reference to use the BACV value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20. Attachment 17
 - K. **2026-11BWG** – Update Notes to Financial Statements Note #5A – Mortgage Loans by adding a paragraph to disclose mortgage loans acquired through a qualifying investment in a qualifying statutory trust. Attachment 18
 - L. **2026-12BWG** – Update the AVR factors to zero in columns 7 and 9 for the Collateral Loan section. Attachment 19
4. Consider Exposure of New Items—*Roy Eft (IN)*
- A. **2026-13BWG** – Add an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state. Attachment 20

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| B. | 2026-14BWG – Update Schedule P instructions with revisions exposed at the Casualty Actuarial and Statistical (C) Task Force. | Attachment 21 |
| C. | 2026-15BWG – Update the “CUSIP” column throughout the annual and quarterly investment schedules to be a “Security Identifier” column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. Add a Security ID Type column to the investment schedules to identify what security identifier is being used. Update references to CUSIP throughout the annual and quarterly statements to the security identifier when the instructions are not specifically referring to CUSIP. | Attachment 22 |
| D. | 2026-16BWG – Update the list of disclosure exclusions for Notes to Financial Statements Note #20C to remove investments accounted for under the equity method. | Attachment 23 |
| E. | 2026-17BWG – Update Annual General Interrogatory 25.04 and 25.05 changing “amount of collateral” to “assets lent.” Update Notes to Financial Statements Note #5L(1) category “Collateral held under security lending agreements” to “Assets lent under security lending agreements.” | Attachment 24 |
| 5. | Consider Adoption of the Editorial Listing— <i>Roy Eft (IN)</i> | Attachment 25 |
| 6. | Receive a Referral Memorandum for Combining Security Identifiers and Adding a Security Identifier Type Field to the Financial Statements— <i>Roy Eft (IN)</i> | Attachment 26 |
| 7. | Discuss the Technical Systems Issue – Schedule B, Parts 1, 2, and 3 Line Number Expansion— <i>Roy Eft (IN)</i> | Attachment 27 |
| 8. | Discuss Any Other Matters Brought Before the Working Group— <i>Roy Eft (IN)</i> | |
| 9. | Adjournment | |
| | <i>The following documents are being provided as reference materials:</i> | |
| | <i>Summary of Comment Letters</i> | Attachment 28 |
| | <i>Comment Letters</i> | Attachment 29 |

Draft: 3/9/26

Blanks (E) Working Group
Virtual Meeting
March 5, 2026

The Blanks (E) Working Group of the Accounting Practices and Procedures (E) Task Force met March 5, 2026. The following Working Group members participated: Steve Drutz, Vice Chair (WA); David Phifer (AK); Kim Hudson (CA); Wayne Shepherd (CT); Philip Barlow and N. Kevin Brown (DC); Tom Hudson (DE); Carolina Herrera Wagoner (FL); Kevin Clark and Daniel Mathis (IA); Jason Tippett (MI); Kelly Hopper and Danielle Smith (MO); Tadd Wegner (NE); Paul Lupo (NJ); Dale Bruggeman and Tracy Snow (OH) Miriam Fisk and Shawn Frederick (TX); Jake Garn (UT); Mike Erdman and Adrian Jaramillo (WI).

1. Adopted its Nov. 5, 2025, Minutes

Drutz stated that the Working Group met Nov. 5, 2025. During this meeting, the Working Group took the following action: 1) exposed four blanks proposals—2025-17BWG, 2025-18BWG, 2025-19BWG, and 2025-20BWG; 2) adopted the editorial listing; 3) reviewed the Blanks (E) Working Group’s 2026 charges; and 4) reviewed the state filing checklists.

Kim Hudson made a motion, seconded by Shepherd, to adopt the Working Group’s Nov. 5 minutes (*see NAIC Proceedings, Fall 2025, Accounting Practices and Procedures (E) Task Force, Attachment Two*). The motion passed unanimously.

2. Adopted Previously Exposed Items

A. Agenda Item 2025-17BWG

Bruggeman stated that this blanks proposal incorporates revisions to reflect adopted changes from Statutory Accounting Principles (E) Working Group agenda item 2025-20. These changes primarily align existing disclosures for debt securities in how they are reported across the Statements of Statutory Accounting Principles (SSAPs). A new general interrogatory was added to capture information on the measurement method for residuals.

Bruggeman stated that although industry has proposed an initial effective date of Jan. 1, 2027, the majority of the disclosures are already required. The blanks proposal simply consolidates the reporting locations, with improved data-captured templates to capture the disclosures in a single location for all forms of debt securities. As such, the proposal is to retain the year-end 2026 effective date. Quarterly reporting with the new templates will begin in 2027. A minor clarification was incorporated to clarify that the disclosure identifies the measurement method used for residuals “or if the reporting entity is transitioning from the practical expedient to the allowable earned yield method.”

Bruggeman made a motion, seconded by Kim Hudson, to adopt the modifications to the proposal. The motion passed unanimously. Bruggeman made a motion, seconded by Shepherd, to adopt the modified proposal (Attachment Two-A). The motion passed unanimously.

B. Agenda Item 2025-18BWG

Drutz stated that this proposal adds instructions for the health blank general interrogatory part 2, lines 10.21 through 10.24. The proposal adds a cross-check from the general interrogatory to Exhibit 7, Part 1. This proposal was created to clarify what should be included in each line of interrogatory 10.2 by adding instructions, an

example, and a cross-check reference back to Exhibit 7, Part 1. There were no interested party comments. The effective date is annual 2026.

Smith made a motion, seconded by Trippett, to adopt the proposal (Attachment Two-B). The motion passed unanimously.

C. Agenda Item 2025-19BWG

Hopper stated that this proposal adds a code of “S” to the Active Status column on Schedule Ts for all statement types to indicate whether a license has been suspended. The purpose of this proposal is to clarify whether a reporting entity’s license is active or suspended, and to inform regulators and consumers if the company has a suspended license. Hopper clarified that this applies to the state licensing status of final and public suspensions.

Interested parties recommended that the effective date be updated to “1st Quarter 2027” instead of starting with annual 2026 so that the Schedule T for the quarterly and annual statements within the same year would be consistently presented. He stated that this is a relatively minor change, and the quarter and annual might not be consistent anyway if a change was made within the year. As the sponsor, Hopper stated that he prefers to keep the effective date as annual 2026 so regulators can obtain the information sooner. There was a minor modification of checking the cross-check box on the cover page to indicate that the footnote cross-check was updated.

Hopper made a motion, seconded by Shepherd, to adopt the proposal with the minor modification (Attachment Two-C). The motion passed unanimously.

D. Agenda Item 2025-20BWG

Bruggeman stated that this blanks proposal incorporates revisions to reflect adopted changes from Statutory Accounting Principles (E) Working Group agenda item 2024-21. That agenda item reflects the Working Group’s support for eliminating the investment subsidiary concept from the annual statement instructions, effective Dec. 31, 2026. A referral was also provided to the Capital Adequacy (E) Task Force to incorporate corresponding revisions.

Bruggeman stated that, as background, the concept of an investment subsidiary was removed from *SSAP No. 97–Investments in Subsidiary, Controlled and Affiliated Entities* in 2005. While that guidance has been eliminated, there are still instructions in Schedule D, Part 6, Section 1, and in the asset valuation reserves (AVRs) for reporting investment subsidiaries. This reporting allows for a look-through risk-based capital (RBC) based on the underlying assets of an investment subsidiary. However, because investment subsidiaries are not recognized in the SSAPs, there is no applicable statutory accounting or measurement guidance for the investments held within them. There are also no mechanisms to ensure compliance with the SSAP requirements, state investment limitations, or the RBC calculation. Further, the Schedule D, Part 6, Section 1, instruction requires reporting entities to measure investment subsidiaries using an “imputed statutory value,” but this term is undefined and conflicts with SSAP No. 97, which requires measurement based on audited U.S. generally accepted accounting principles (GAAP). With the deletion of the specific investment subsidiary lines, reporting entities that continue to hold the investment shall report them on other applicable reporting lines and measure them in accordance with SSAP No. 97.

For modifications, a drafting note was added as the line numbers may be revised with other proposals that impact AVR. Although a comment was received to delay the effective date, that is not supported, and the blanks revisions are proposed to be effective for year-end 2026.

Bruggeman made a motion, seconded by Kim Hudson, to adopt the modifications to the proposal. The motion passed unanimously. Bruggeman made a motion, seconded by Shepherd, to adopt the modified proposal (Attachment Two-D). The motion passed unanimously.

E. Agenda Item 2025-21BWG

Fisk stated that this proposal incorporates several changes developed by the Actuarial Opinion (C) Working Group, effective for the *2026 Annual Property/Casualty (P/C) Statement of Actuarial Opinion*. The first change is to revise the definition of accepted actuarial designation. This was prompted by changes to the Society of Actuaries' (SOA's) educational pathways. The previous assessment of the educational materials was conducted in 2019, prompting the need for an update. The Working Group proposed changes to the definition of accepted actuarial designation. Beyond that, clarification was added to several elements that were either noted by regulators or by industry actuaries as confusing or inconsistently reported under the previous instructions. Examples of those clarifications are the reporting for direct and assumed unearned premiums for long duration contracts; the schedule P reconciliation; the reconciliation of data used by the actuary and Schedule P; and the requirements of the actual report when the appointed actuary has made use of an analysis or opinion produced by another person. Edits were also made to the Exhibit B disclosure section of the opinion to eliminate unnecessary reporting and address inconsistencies. No comments from interested parties were received.

Kim Hudson made a motion, seconded by Wagoner, to adopt the proposal (Attachment Two-E). The motion passed unanimously.

F. Agenda Item 2025-22BWG

Clark stated that this blanks proposal incorporates revisions to reflect adopted changes from Statutory Accounting Principles (E) Working Group agenda item 2025-19. That agenda item adopted new disclosures to identify whether securities subject to the Securities and Exchange Commission (SEC) registration are publicly registered, considered a private placement under Rule 144, or a non-144A private placement. As not all items on certain investment schedules are subject to SEC registration, a "not applicable" reporting code has been included to identify those securities. The adopted disclosure includes identification on a per-security basis in the investment schedules, as well as an aggregate data-capture disclosure that pulls key information by security classification.

For modifications, Clark agreed that the Statutory Accounting Principles (E) Working Group adopted item was to include identification in the quarterly acquisition and disposal schedules; therefore, the inclusion is agreed upon. In addition, it is also agreed that Schedule DL, Part 1, which captures securities lending assets not included on the investment schedules, should be excluded. The assets reported on Schedule DL, Part 2, are reported on the investment schedules and will be captured as part of the investment schedule reporting.

Clark made a motion, seconded by Shepherd, to adopt the modifications to the proposal. The motion passed unanimously. Clark made a motion, seconded by Wegner, to adopt the modified proposal (Attachment Two-F). The motion passed unanimously.

G. Agenda Item 2025-23BWG

Clark stated that this blanks proposal incorporates the concept of nonadmitted assets within the separate account balance sheet and corresponding schedules pursuant to the Statutory Accounting Principles (E) Working Group agenda item 2025-25. This agenda item is pending consideration at the Working Group level to be discussed on March 23 at the 2026 Spring National Meeting.

In response to industry comments, it is agreed that reporting entities should not assess prior year assets to determine nonadmitted status. However, if the separate account had previously identified nonadmitted assets in existing schedules that detailed those instances, those assets shall be reported as nonadmitted in the prior year column.

As this item has not yet been adopted by the Statutory Accounting Principles (E) Working Group, it is recommended that the Blanks (E) Working Group proceed with adopting the modifications to the proposal but then defer adoption consideration until after the Statutory Accounting Principles (E) Working Group considers this item at the 2026 Spring National Meeting.

Clark made a motion, seconded by Wegner, to adopt the modifications to the proposal. The motion passed unanimously. Clark made a motion, seconded by Shepherd, to defer the modified proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

H. Agenda Item 2025-24BWG

Clark stated that this blanks proposal incorporates revisions consistent with Statutory Accounting Principles (E) Working Group agenda item 2025-30 to clarify the disclosure of amounts received and paid by the insurance reporting entity on behalf of administrative service contracts (ASC) plans and improve the data-captured template to ensure consistent application and cross-checks.

Although no industry comments have been received, as this item has not yet been adopted by the Statutory Accounting Principles (E) Working Group, it is recommended that the Blanks (E) Working Group defer adoption consideration until after the Statutory Accounting Principles (E) Working Group considers this item at its 2026 Spring National Meeting.

Clark made a motion, seconded by Shepherd, to defer the proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

I. Agenda Item 2025-25BWG

Clark stated that this blanks proposal incorporates revisions consistent with Statutory Accounting Principles (E) Working Group agenda item 2025-34 to expand the existing phase-in disclosure to include the economic scenario generator phase-in by adding a reference to *Valuation Manual* (VM)-30, Actuarial Opinion and Memorandum Requirements, on non-variable annuities. Interested parties recommended including language permitting a reporting entity to stop disclosing the chosen phase-in period once the financial statements no longer reflect its impacts. It is agreed that if the phase-in was not used or is no longer relevant, there is no need to complete the note. However, it is believed that further instructions are unnecessary, as the annual statement instructions at the beginning of the notes section already provide guidance. These instructions state that when a previously applied disclosure is no longer relevant or no longer applies, the reporting entity can indicate "not applicable."

Interested parties recommended removing the check in the boxes for P/C and title in the "Blanks to which proposal applies" to be consistent with the sponsoring Statutory Accounting Principles (E) Working Group exposure. Because Note 2 is a uniform note, the update needs to be made in all statements.

As this item has not yet been adopted by the Statutory Accounting Principles (E) Working Group, it is recommended that the Blanks (E) Working Group proceed with deferring the proposal until after the Statutory Accounting Principles (E) Working Group considers this item at the 2026 Spring National Meeting.

Clark made a motion, seconded by Tom Hudson, to defer the proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

J. Agenda Item 2025-26BWG

Clark stated that this blanks proposal incorporates revisions to update and modernize the expense descriptions and categories in the annual statement blanks, consistent with Statutory Accounting Principles (E) Working Group agenda item 2025-33. Interested parties provided comments noting that they did not have any concerns with the edits but asked if there would be revisions to section 15 for computer software. The omission of Section 15 was intentional, as there were no planned changes to it, and it was excluded from the original exposure.

As this item has not yet been adopted by the Statutory Accounting Principles (E) Working Group, it is recommended that the Blanks (E) Working Group proceed with adopting the minor edit to the proposal but then defer adoption consideration until after the Statutory Accounting Principles (E) Working Group considers this item at the 2026 Spring National Meeting

Clark made a motion, seconded by Wegner, to adopt the modifications to the proposal. The motion passed unanimously. Clark made a motion, seconded by Snow, to defer the modified proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

K. Agenda Item 2025-27BWG

Barlow stated that this proposal was originally sponsored by the Risk-Based Capital Investment Risk and Evaluation (E) Working Group to facilitate the Working Group's work of evaluating the appropriate RBC treatment of asset-backed securities (ABS), starting with collateralized loan obligations (CLOs). The annual statement AVR default component table is proposed to have a more granular reporting by bifurcating long-term bonds into: 1) long-term bonds, excluding CLOs; and 2) CLOs.

Barlow stated that, in response to comments received by the Risk-Based Capital Investment Risk and Evaluation (E) Working Group, NAIC committee support modified this proposal to make it clear that the CLOs bucket in the new AVR table should include all types of CLOs, as well as collateralized bond obligations (CBOs) and collateralized debt obligations (CDOs) as reported in Schedule D, Part 1, Section 2. This will facilitate cross-check between AVR and Investment Schedules. Interested parties provided comments to defer this Blanks proposal, with the rationale being that "there are key elements of the sponsoring exposure from the RBC Investment Risk & Evaluation (E) Working Group that haven't been determined that could influence changes to AVR." The Risk-Based Capital Investment Risk and Evaluation (E) Working Group cannot rule out the possibility of proposing further changes to the AVR proposals but gain support from the American Academy of Actuaries (Academy) to apply the new CLO RBC methodology to broaden the scope of securitized investments, including CBOs and CDOs. This proposal further modifies the AVR Equity and Other Invested Asset Component table to facilitate the changes proposed by LRBC proposal 2026-02-L to the LR009 BA Mortgage page.

Brown made a motion, seconded by Kim Hudson, to adopt the modifications to the proposal. The motion passed unanimously. Brown made a motion, seconded by Kim Hudson, to re-expose the modified proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

L. Agenda Item 2025-28BWG

Clark stated that this blanks proposal incorporates reporting components consistent with the adopted Statutory Accounting Principles (E) Working Group agenda item 2025-13 to identify mortgage loans held in a qualifying statutory trust, as well as foreclosed real estate held within a qualifying statutory trust. The guidance was adopted

with an effective date of Jan. 1, 2027, with early application permitted. By incorporating these codes as of year-end 2026, the reporting will be available for those who elect to early apply. The industry comments requested clarification that the investment characteristics column should be left blank if none of the characteristics apply. This clarification is supported.

Clark made a motion, seconded by Shepherd, to adopt the modifications to the proposal. The motion passed unanimously. Clark made a motion, seconded by Snow, to adopt the modified proposal (Attachment Two-G). The motion passed unanimously.

M. Agenda Item 2025-29BWG

Clark stated that this proposal incorporates additional “restricted asset” codes to be used in the investment schedules to identify investments pledged under funds withheld or modified coinsurance (modco) reinsurance agreements consistent with Statutory Accounting Principles (E) Working Group agenda item 2025-27. Currently, all restricted investments are identified in the investment schedules with a code. With the expansion of the restricted asset note disclosure to explicitly capture information on investments allocated as funds withheld and modco, the investment schedule reporting codes were not expanded. As such, reporting entities are using the “other” restricted asset code for these items. The expansion simply adds new codes to better identify the types of restrictions.

Clark stated that interested parties provided comments recommending that NAIC committee support work further with them on this proposal to arrive at an acceptable compromise. The comments from interested parties noted concern that assets subject to a modco or funds withheld arrangement be reported in aggregate elsewhere, whereas, with this agenda item, they would have to break that out by specific restricted asset coding for funds withheld and modco assets. They also recommended that the reporting only be on the life/fraternal blank and be excluded from the others, similar to how Schedule S, Part 8 was done. As this item has not yet been adopted by the Statutory Accounting Principles (E) Working Group, it is recommended that deferral of adoption be considered until after the issue is addressed at the 2026 Spring National Meeting.

Clark made a motion, seconded by Shepherd, to defer the proposal with a 53-day public comment period ending April 28. The motion passed unanimously.

N. Agenda Item 2025-30BWG

Clark stated that this proposal incorporates a slight change to the retirement plan disclosure (Note 12— Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans) to capture instances in which net asset value (NAV) is used, consistent with adopted Statutory Accounting Principles (E) Working Group agenda item 2025-21. The disclosure previously captured information on plan assets by fair value hierarchy, and the revisions simply add a column for NAV.

Clark made a motion, seconded by Wegner, to adopt the proposal with the minor edits (Attachment Two-H). The motion passed unanimously.

3. Exposed New Items

A. Agenda Item 2026-01BWG

Clark stated that this proposal proposes updating Note 26—Intercompany Pooling Arrangements to reflect changes in an intercompany pooling arrangement. It requires disclosing the fair value and amortized cost of transferred assets when fair values differ from cost or amortized cost. This aligns with Statutory Accounting Principles (E) Working Group agenda item 2022-12, adopted in 2024. NAIC committee support identified the need to update Note 26 instead of keeping this information in the other note.

Hearing no objection, Drutz stated that the proposal is exposed for a 53-day public comment period ending April 28.

B. Agenda Item 2026-02BWG

Clark stated that this blanks proposal incorporates cross-checks between the Federal Home Loan Bank (FHLB) note disclosure (Note 11B—Debt FHLB Agreements) and general interrogatory #26 to ensure that the information reported for FHLB stock and collateral pledged agrees within the financial statements

Hearing no objection, Drutz stated that the proposal is exposed for a 53-day public comment period ending April 28.

C. Agenda Item 2026-03BWG

Amy Fitzpatrick (NAIC) stated that this proposal updates the life and fraternal annual and quarterly statement blanks and instructions for Exhibit 5, the Variable Annuity Supplement, due to the implementation of principles-based reserving for VM-22, Requirements for Principle-Based Reserves for Non-Variable Annuities. These changes are intended to allow regulators to review and analyze data on variable and non-variable annuities as they relate to the implementation of VM-22.

Hearing no objection, Drutz stated that the proposal is exposed for a 53-day public comment period ending April 28.

D. Agenda Item 2026-04BWG

Tim Nauheimer (NAIC) stated that this proposal is sponsored by the Macroprudential (E) Working Group and seeks additional funding agreement disclosure requirements to monitor activity in the funding agreement-backed note (FABN) market in accordance with its financial stability monitoring objectives. This proposed disclosure will enable the Financial Stability (E) Task Force to identify transmission channels of potential risk to and from the insurance industry and its interconnectedness with the capital markets.

The disclosure will also give state regulators greater transparency into operating leverage. The Macroprudential (E) Working Group has been monitoring funding agreement backing note or FABN activity over the past five years and observed a significant increase in activity. However, monitoring efforts of the Working Group have been hampered due to the lack of available data in the annual statement to identify FABNs.

Hearing no objection, Eft stated that the proposal is exposed for a 53-day public comment period ending April 28.

4. Adopted the Editorial Listing

Kim Hudson made a motion, seconded by Snow, to adopt the editorial listing (Attachment Two-I). The motion passed unanimously.

5. Received Memorandums

A. Statutory Accounting Principles (E) Working Group

Clark stated that during 2025, the Statutory Accounting Principles (E) Working Group adopted agenda item 2024-07, which created the new Schedule S, Part 8, for the reporting of assets subject to a modco or funds withheld arrangement. Prior to the final adoption, there was a change in scope. The project originally included the disclosure of any and all assets subject to a funds withheld or modco arrangement; the final adoption included only these assets that transfer investment risk, which more closely aligns with RBC reporting. The memo is intended to clarify exactly what is to be included in the scope of reporting for Schedule S, Part 8, and also clarifies that nothing in the new reporting is intended to override any guidance in the RBC instructions.

Kim Hudson made a motion, seconded by Tom Hudson, to receive the memorandum (Attachment Two-J). The motion passed unanimously.

B. Macroprudential (E) Working Group: FABNs and Other Structures

Nauheimer stated that this memorandum is in support of blanks proposal 2026-04BWG and provides some additional explanation.

Kim Hudson made a motion, seconded by Wegner, to receive the memorandum (Attachment Two-K). The motion passed unanimously.

Having no further business, the Blanks (E) Working Group adjourned.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

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| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Dale Bruggeman</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Ohio Department of Insurance</u></p> <p>ADDRESS: <u>50W. Town St., 3rd Fl., Ste. 300</u> <u>Columbus, OH 43215</u></p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-23BWG MOD</u> Year <u>2026</u>2027</p> <p>Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] <i>***If Yes, complete question below***</i></p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [X] Deferred Date <u>3/5/2026</u> [] Other (Specify) _____</p> |
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BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
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| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input type="checkbox"/> Title |
| <input type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the Separate Account Assets page by adding a "Nonadmitted Assets" and "Net Admitted General Account Assets." Add a new line on the Separate Account Summary of Operations for "Change in Nonadmitted Assets" within the surplus account. Insert a new page "Exhibit of Nonadmitted Assets" that will detail the current and prior total nonadmitted assets, and the change in nonadmitted assets.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was prepared to capture nonadmitted assets on the separate account blank for assets held at the general account basis. (SAPWG Ref #2025-25)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – SEPARATE ACCOUNTS**INSTRUCTIONS****FOR COMPLETING SEPARATE ACCOUNTS ANNUAL STATEMENT BLANK****Detail Eliminated To Conserve Space****ASSETS**

Receivables from the General Account Statement must be excluded from the assets of the Separate Accounts Statement to eliminate the need for consolidating adjustments in the General Account Statement. Such receivables must be reported as a negative liability and netted against payables to the General Account Statement (see instructions for Page 3, Line 10, Other Transfers to General Account Due or Accrued (Net)).

Columns 1

~~& 2 – General Account Basis and Fair Value Basis~~

~~Report in the General Account Basis column, Column 1, the assets of those separate accounts whose assets are carried at the same basis as the general account. Include all separate accounts whose assets support fund accumulation contracts (GICs), which do not participate in underlying portfolio experience, with fixed interest rate guarantee, purchased under a retirement plan or plan of deferred compensation, established or maintained by an employer. Such assets must be valued as if the assets were held in the general account.~~

~~Report in the Fair Value Basis column, Column 2, the assets of those separate accounts whose assets are carried at market value. Include separate account whose assets support all other policies and contracts and those liabilities being recorded at current interest rates.~~

Contracts with assets held in a separate account where the separate account's plan of operations was filed and approved prior to codification's effective date, that are continuing to be valued on the approved basis shall be reported in the General Account or Fair Value basis columns.

Further instruction in the determination of appropriate valuation basis for amounts that are to be reported in the assets can be located in *SSAP No. 56—Separate Accounts*.

Column 2 – Nonadmitted Assets

Include: Amounts for which the state does not allow the reporting entity to take credit.

Refer to the Annual Statement Instructions, Exhibit of Nonadmitted Assets.

Column 3 – Net Admitted Assets

The amount in Column 3 equals Column 1 minus Column 2. The amounts reported in Column 3 should agree to the appropriate schedules.

Column 4 – Fair Value Basis

Report the assets of those separate accounts whose assets are carried at market value. Include separate account whose assets support all other policies and contracts and those liabilities being recorded at current interest rates.

Contracts with assets held in a separate account where the separate account's plan of operations was filed and approved prior to codification's effective date, that are continuing to be valued on the approved basis shall be reported in the General Account or Fair Value basis columns.

Further instruction in the determination of appropriate valuation basis for amounts that are to be reported in the assets can be located in SSAP No. 56—*Separate Accounts*.

Column ~~3~~5 – Total of General Account Admitted and Fair Value

The amount to be reported equals the sum of Columns ~~1, 2, 3, and 4.~~3 and 4.

SUMMARY OF OPERATIONS**Detail Eliminated To Conserve Space**SURPLUS ACCOUNT

Line 22 - Change in Nonadmitted Assets

Equals the amount on the Exhibit of Nonadmitted Assets, Line 28, Column 3.

Line ~~22~~23 - Transfer from Separate Accounts of the Change in Expense Allowances Recognized in Line 21

Report the amount of decrease or (increase), if any, in the excess of policyholder account values as appropriate, over modified reserves such as the expense allowance provided by the use of CARVM or CRVM, reported in Exhibit 3A and Line 22. Such excess or expense allowance must be reported as a transfer to the general account.

EXHIBIT OF NONADMITTED ASSETS

This schedule should include the nonadmitted amounts for all assets (both group and individual) amounts for both invested assets and other than invested assets.

The lines in this schedule are identical to those included in the Separate Account Assets Page. The Column 1 amount should equal the amount reported in the same specific line in the Nonadmitted Assets column of the Assets Page (Page 2, Column 2, Line 2816).

Column 1 – Current Year Total Nonadmitted Assets

Include: Nonadmitted goodwill as prescribed in SSAP No. 68—Business Combinations and Goodwill.

Nonadmitted invested assets due to state aggregate investment limitations.

Nonadmitted amounts due to specific surplus notes.

Nonadmitted invested asset amounts due to designation restrictions by the state (e.g., designation 6 securities must be partially or wholly nonadmitted).

Non-operating systems software.

Electronic data processing (EDP) equipment and operating software in excess of 3% of capital and surplus for the most recently filed statement adjusted to exclude any EDP equipment and operating system software, net deferred tax assets and net positive goodwill.

Prepaid expense (SSAP No. 29—Prepaid Expenses).

Column 2 – Prior Year Total Nonadmitted Assets

This column should contain the total (sum of group and individual) nonadmitted amounts from the prior year annual statement.

Column 3 – Change in Total Nonadmitted Assets

This column should equal Column 2 minus Column 1. The amount reported in the total line of this column should equal the amount reported in the “Change in Nonadmitted Assets” line of the Capital and Surplus Account calculation.

ANNUAL STATEMENT BLANK – SEPARATE ACCOUNTS

ASSETS

| | Current Year | | | | | Prior Year |
|--|----------------------------|---|---|-----------------------|--|---|
| | 1 General Account Basis | 2 Fair Value Basis Nonadmitted Assets | 3 Total (Cols. 1 + 2) Net Admitted General Account Assets (Cols 1-2) | 4 Fair Value Basis | 5 Total of General Account Admitted and Fair Value (Cols 1+2+3+4) | 6 Total of General Account Admitted and Fair Value |
| 1. Bonds (Schedule D) | | | | | | |
| 2. Stocks (Schedule D): | | | | | | |
| 2.1 Preferred stock | | | | | | |
| 2.2 Common stocks | | | | | | |
| 3. Mortgage loans on real estate (Schedule B) | | | | | | |
| 4. Real estate (Schedule A): | | | | | | |
| 4.1 Properties held for the production of income (less \$..... encumbrances) | | | | | | |
| 4.2 Properties held for sale (less \$..... encumbrances) | | | | | | |
| 5. Cash (\$....., Schedule E – Part 1) and cash equivalents (\$....., Schedule E – Part 2) | | | | | | |
| 6. Short-term investments (Schedule DA) | | | | | | |
| 7. Derivatives (Schedule DB) | | | | | | |
| 8. Other invested assets (Schedule BA) | | | | | | |
| 9. Securities lending reinvested collateral assets (Schedule DL) | | | | | | |
| 10. Aggregate write-ins for invested assets | | | | | | |
| 11. Subtotals—Cash and invested assets (Lines 1 to 10) | | | | | | |
| 12. Investment income due and accrued | | | | | | |
| 13. Receivables for securities | | | | | | |
| 14. Net adjustment in assets and liabilities due to foreign exchange rates | | | | | | |
| 15. Aggregate write-ins for other-than-invested assets | | | | | | |
| 16. Lines 11 to 15 | | | | | | |
| DETAILS OF WRITE-INS | | | | | | |
| 1001. | | | | | | |
| 1002. | | | | | | |
| 1003. | | | | | | |
| 1098. Summary of remaining write-ins Line 10 from overflow page | | | | | | |
| 1099. Totals (Lines 1001 through 1003 plus 1098) (Line 10 above) | | | | | | |
| 1501. | | | | | | |
| 1502. | | | | | | |
| 1503. | | | | | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | | | | | |
| 1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above) | | | | | | |

SUMMARY OF OPERATIONS

| | 1 Current Year | 2 Prior Year |
|--|----------------------|--------------------|
| 1. Transfers to Separate Accounts: | | |
| 1.1 Net premiums and annuity considerations for life and accident and health contracts | | |
| 1.2 Considerations for supplementary contracts with life contingencies | | |
| 1.3 Aggregate write-ins for other transfers to Separate Accounts..... | | |
| 1.4 Totals (Lines 1.1 to 1.3)..... | | |
| 2. Transfers on account of deposit-type contracts (including \$.....deposits less \$.....withdrawals) | | |
| 3. Net investment income and capital gains and losses | | |
| 4. Aggregate write-ins for other income | | |
| 5. Totals (Lines 1.4 to 4) | | |
| DEDUCT: | | |
| 6. Transfers from the Separate Account on account of contract benefits: | | |
| 6.1 Death benefits | | |
| 6.2 Matured endowments | | |
| 6.3 Annuity benefits | | |
| 6.4 Payments on supplementary contracts with life contingencies | | |
| 6.5 Accident and health benefits..... | | |
| 6.6 Surrender benefits and withdrawals for life contracts | | |
| 6.7 Aggregate write-ins for other transfers from Separate Accounts on account of contract benefits | | |
| 7. Transfers on account of policy loans | | |
| 8. Net transfer of reserves from or (to) Separate Accounts | | |
| 9. Other transfers from the Separate Accounts: | | |
| 9.1 Federal and foreign income taxes incurred | | |
| 9.2 Change in expense allowances recognized in reserves | | |
| 9.3 Aggregate write-ins for other transfers from Separate Accounts | | |
| 10. Subtotals (Lines 6.1 to 9.3) | | |
| 11. Fees associated with charges for investment management, administration and contract guarantees | | |
| 12. Increase in aggregate reserve for life and accident and health contracts | | |
| 13. Increase in liability for deposit-type contracts | | |
| 14. Increase in reserve for future federal income taxes | | |
| 15. Aggregate write-ins for reserves and funds..... | | |
| 16. Totals (Lines 10 to 15) | | |
| 17. Net gain from operations (including \$.....unrealized capital gains) (Line 5 minus Line 16) | | |
| SURPLUS ACCOUNT | | |
| 18. Surplus, December 31, prior year | | |
| 19. Net gain from operations (Line 17) | | |
| 20. Surplus contributed or (withdrawn) during year | | |
| 21. Change in reserve on account of change in valuation basis, (increase) or decrease | | |
| 22. Change in Nonadmitted Assets | | |
| 223. Transfer from Separate Accounts of the change in expense allowances recognized in Line 21 | | |
| 224. Aggregate write-ins for gains and losses in surplus | | |
| 225. Surplus, December 31, current year (Page 3, Line 21) | | |
| DETAILS OF WRITE-INS | | |
| 01.301. | | |
| 01.302. | | |
| 01.303. | | |
| 01.398. Summary of remaining write-ins for Line 1.3 from overflow page | | |
| 01.399. Totals (Lines 01.301 through 01.303 plus 01.398) (Line 1.3 above) | | |
| 0401. | | |
| 0402. | | |
| 0403. | | |
| 0498. Summary of remaining write-ins for Line 4 from overflow page | | |
| 0499. Totals (Lines 0401 through 0403 plus 0498) (Line 4 above) | | |
| 06.701. | | |
| 06.702. | | |
| 06.703. | | |
| 06.798. Summary of remaining write-ins for Line 6.7 from overflow page | | |
| 06.799. Totals (Lines 06.701 through 06.703 plus 06.798) (Line 6.7 above) | | |
| 09.301. | | |
| 09.302. | | |
| 09.303. | | |
| 09.398. Summary of remaining write-ins for Line 9.3 from overflow page | | |
| 09.399. Totals (Lines 09.301 through 09.303 plus 09.398) (Line 9.3 above) | | |
| 1501. | | |
| 1502. | | |
| 1503. | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | |
| 1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above) | | |
| 2301 2401. | | |
| 2302 2402. | | |
| 2303 2403. | | |
| 2398 2498. Summary of remaining write-ins for Line 23-24 from overflow page | | |
| 2399 2499. Totals (Lines 2301-2401 through 2303-2403 plus 2398 2498) (Line 23-24 above) | | |

EXHIBIT OF NONADMITTED ASSETS

| | <u>1</u> | <u>2</u> | <u>3</u> |
|--|--|--|--|
| | Current Year Total Nonadmitted Assets | Prior Year Total Nonadmitted Assets | Change in Total Nonadmitted Assets (Col. 2 – Col. 1) |
| 1. Bonds (Schedule D)..... | | | |
| 2. Stocks (Schedule D): | | | |
| 2.1 Preferred stock..... | | | |
| 2.2 Common stocks..... | | | |
| 3. Mortgage loans on real estate (Schedule B)..... | | | |
| 4. Real estate (Schedule A): | | | |
| 4.1 Properties held for the production of income (less \$..... encumbrances)..... | | | |
| 4.2 Properties held for sale (less \$..... encumbrances)..... | | | |
| 5. Cash (\$....., Schedule E – Part 1) and cash equivalents (\$....., Schedule E – Part 2)..... | | | |
| 6. Short-term investments (Schedule DA)..... | | | |
| 7. Derivatives (Schedule DB)..... | | | |
| 8. Other invested assets (Schedule BA)..... | | | |
| 9. Securities lending reinvested collateral assets (Schedule DL)..... | | | |
| 10. Aggregate write-ins for invested assets..... | | | |
| 11. Subtotals—Cash and invested assets (Lines 1 to 10)..... | | | |
| 12. Investment income due and accrued..... | | | |
| 13. Receivables for securities..... | | | |
| 14. Net adjustment in assets and liabilities due to foreign exchange rates..... | | | |
| 15. Aggregate write-ins for other-than-invested assets..... | | | |
| 16. Lines 11 to 15 | | | |
| DETAILS OF WRITE-INS | | | |
| 1001. | | | |
| 1002. | | | |
| 1003. | | | |
| 1098. Summary of remaining write-ins Line 10 from overflow page | | | |
| 1099. Totals (Lines 1001 through 1003 plus 1098) (Line 10 above) | | | |
| 1501. | | | |
| 1502. | | | |
| 1503. | | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | | |
| 1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above) | | | |

***** Drafting Note – The Exhibit of Nonadmitted Assets in this proposal was initially setup using the General Account’s Exhibit of Nonadmitted Assets. It should be using the same rows as the Separate Account Assets page. Due to this whole table changing we are showing this as deleting the original table (on next page) and the one on this page is the correct Separate Account Exhibit of Nonadmitted Assets.*****

| | 1 Current Year Total Nonadmitted Assets | 2 Prior Year Total Nonadmitted Assets | 3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1) |
|---|--|--|---|
| 1. Bonds (Schedule D)..... | | | |
| 2. Stocks (Schedule D): | | | |
| 2.1 Preferred stocks..... | | | |
| 2.2 Common stocks..... | | | |
| 3. Mortgage loans on real estate (Schedule B): | | | |
| 3.1 First liens..... | | | |
| 3.2 Other than first liens..... | | | |
| 4. Real estate (Schedule A): | | | |
| 4.1 Properties occupied by the company..... | | | |
| 4.2 Properties held for the production of income..... | | | |
| 4.3 Properties held for sale..... | | | |
| 5. Cash (Schedule E-Part 1), cash equivalents (Schedule E-Part 2) and short term investments (Schedule DA)..... | | | |
| 6. Contract loans..... | | | |
| 7. Derivatives (Schedule DB)..... | | | |
| 8. Other invested assets (Schedule BA)..... | | | |
| 9. Receivables for securities..... | | | |
| 10. Securities lending reinvested collateral assets (Schedule DL)..... | | | |
| 11. Aggregate write-ins for invested assets..... | | | |
| 12. Subtotals, cash and invested assets (Lines 1 to 11)..... | | | |
| 13. Title plants (for Title insurers only)..... | | | |
| 14. Investment income due and accrued..... | | | |
| 15. Premiums and considerations: | | | |
| 15.1 Uncollected premiums and agents' balances in the course of collection..... | | | |
| 15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due..... | | | |
| 15.3 Accrued retrospective premiums and contracts subject to redetermination..... | | | |
| 16. Reinsurance: | | | |
| 16.1 Amounts recoverable from reinsurers..... | | | |
| 16.2 Funds held by or deposited with reinsured companies..... | | | |
| 16.3 Other amounts receivable under reinsurance contracts..... | | | |
| 17. Amounts receivable relating to uninsured plans..... | | | |
| 18.1 Current federal and foreign income tax recoverable and interest thereon..... | | | |
| 18.2 Net deferred tax asset..... | | | |
| 19. Guaranty funds receivable or on deposit..... | | | |
| 20. Electronic data processing equipment and software..... | | | |
| 21. Furniture and equipment, including health care delivery assets..... | | | |
| 22. Net adjustment in assets and liabilities due to foreign exchange rates..... | | | |
| 23. Receivables from parent, subsidiaries and affiliates..... | | | |
| 24. Health care and other amounts receivable..... | | | |
| 25. Aggregate write-ins for other than invested assets..... | | | |
| 26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)..... | | | |
| 27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts..... | | | |
| 28. Total (Lines 26 and 27)..... | | | |
| DETAILS OF WRITE-INS | | | |
| 1101..... | | | |
| 1102..... | | | |
| 1103..... | | | |
| 1198. Summary of remaining write-ins for Line 11 from overflow page..... | | | |
| 1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above)..... | | | |
| 2501..... | | | |
| 2502..... | | | |
| 2503..... | | | |
| 2598. Summary of remaining write-ins for Line 25 from overflow page..... | | | |
| 2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)..... | | | |

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Dale Bruggeman</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Ohio Department of Insurance</u></p> <p>ADDRESS: <u>50W. Town St., 3rd Fl., Ste. 300</u> <u>Columbus, OH 43215</u></p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-24BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] <i>***If Yes, complete question below***</i></p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [X] Deferred Date <u>3/5/2026</u> [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financials Note 18B – ASC Plans for the disclosure clarifications in *SSAP No. 47 – Uninsured Plans*.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was prepared as clarifications to the Administrative Services Contracts (ASC) disclosure in *SSAP No. 47 – Uninsured Plans* in annual statement note 18B. (SAPWG Ref #2025-30)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, & HEALTH

NOTES TO FINANCIAL STATEMENTS

Note 18 - Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans

Instruction:

Provide information with regard to the profitability to the reporting entity of uninsured accident and health plans and the uninsured portions of partially insured plans for which the reporting entity serves as an Administrative Services Only (ASO) or an Administrative Services Contract (ASC) plan administrator.



B. ASC Plans

For ASC plans, provide information with regard to the profitability to the reporting entity of all ASC plans and the uninsured portions of partially insured plans for which the reporting entity serves as an ASC administrator.

For the total and each category separately provide:

- Gross reimbursement for medical cost incurred
- Gross administrative fees accrued
- ~~Other income or expense~~ amounts received by the insurance reporting entity (including interest paid to the insurer or received from ASC plans)
- Other amounts paid by the insurance reporting entity (including interest paid to or on behalf of the ASC plans)
- Gross expenses incurred (claims and administrative)
- Total net gain or loss from operations.

Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

B. ASC Plans

The gain from operations from Administrative Services Contract (ASC) uninsured plans and the uninsured portion of partially insured plans was as follows during 20__:

| | <u>ASC Uninsured Plans</u> | <u>Uninsured Portion of Partially Insured Plans</u> | <u>Total ASC</u> |
|--|--------------------------------|---|----------------------|
| a. Gross reimbursement for medical cost incurred | \$ _____ | \$ _____ | \$ _____ |

| | | | | |
|----------------|---|----------|----------|----------|
| b. | Gross administrative fees accrued | \$ _____ | \$ _____ | \$ _____ |
| c. | Other income or expenses <u>amounts received by the insurance reporting entity (including interest paid to the insurer or received from ASC plans)</u> | \$ _____ | \$ _____ | \$ _____ |
| d. | <u>Other amounts paid by the insurance reporting entity (including interest paid to or on behalf of the ASC plan)</u> | \$ _____ | \$ _____ | \$ _____ |
| e. | Gross expenses incurred (claims and administrative) (a+b+c) | \$ _____ | \$ _____ | \$ _____ |
| ef. | Total net gain or loss from operations <u>(a+b+c)-(d+e)</u> | \$ _____ | \$ _____ | \$ _____ |

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

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|--|--|
| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Dale Bruggeman</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Ohio Department of Insurance</u></p> <p>ADDRESS: <u>50W. Town St., 3rd Fl., Ste. 300</u> <u>Columbus, OH 43215</u></p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-25BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] <i>***If Yes, complete question below***</i></p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [X] Deferred Date <u>3/5/2026</u> [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financial Statements Note # 2 – Accounting Changes and Corrections of Errors, by adding the reference to VM-20: Requirements for Principles Based Reserves for Life Products.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was prepared to update the Notes to Financial Statements to be consistent with the updates to the Valuation Manual (VM). (SAPWG Ref #2025-34)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, HEALTH, PROPERTY, & TITLE**NOTES TO FINANCIAL STATEMENTS****Note 2 - Accounting Changes and Corrections of Errors**Instruction:

Describe material changes in accounting principles and/or correction of errors. Include:

- A brief description of the change, encompassing a general disclosure of the reason and justification for the change or correction.
- The impact of the change or correction on net income, surplus, total assets, and total liabilities for the two years presented in the financial statements (i.e., the balance sheet and statement of income).
- The effect on net income of the current period for a change in estimate that affects several future periods, such as a change in the service lives of depreciable assets or actuarial assumptions affecting pensions costs. Disclosure of the effect on those income statement amounts is not necessary for estimates made each period in the ordinary course of accounts for items such as uncollectible accounts. However, disclosure is recommended if the effect of a change in the estimate is material.
- Changes in accounting that are changes in reserve valuation basis as described in *SSAP No. 51—Life Contracts* which have elected phase-in provided for in the Valuation Manual ~~section~~ chapters VM-20 or VM-21, shall also include in the change in accounting disclosures information regarding the application of any phase-in as provided for in *SSAP No. 51*.

Reporting entities shall provide disclosure of the following:

- ❖ The phase-in period being applied, and the remaining time period of the phase in.
- ❖ Any adjustments to the phase-in period.
- ❖ Amount of change in valuation basis phase-in.
- ❖ The remaining amount to be phased-in.
- When subsequent financial statements are issued containing comparative restated results as a result of the filing of an amended financial statement, the reporting entity shall disclose that the prior period has been restated and the nature and amount of such restatement.

Illustration:

During the current year's financial statement preparation, the Company discovered an error in the compiling and reporting of investment income from an affiliate for the prior year. In the prior year, common stocks (Assets Page, Line ____) and investment income earned from affiliates (included in Statement of Revenue and Expenses, Line ____) were understated by \$ _____. Line ____ on the Assets Page and Line ____ on the Gains and Losses section of the Statement of Revenue and Expenses have been adjusted in the current year to correct for this error.

In 2020, the Company, with Commissioner approval elected a phase-in period of ~~three~~ seven years of a change in reserve valuation basis as described in *SSAP No. 51—Life Contracts* for its variable annuity reserves. This change in valuation basis, which impacts annuities reserves written from 1981 to 2019 is permitted under the revisions to the Commissioners Annuity Reserve Valuation Method (CARVM) adopted in *Valuation Manual Requirements for Principle-Based Reserves for Variable Annuities (VM-21)*, and Actuarial Guideline 43 CARVM for variable annuities

(AG 43). There have been no adjustments to the phase-in period. The amount of phase-in, which has been recognized in unassigned funds is \$_____. The remaining amount to be phased-in is \$_____.

In 2026, the Company elected a phase-in period of three years of a change in reserve valuation basis as described in SSAP No. 51—Life Contracts for its reserves changes related to the prescribed economic scenario generator. This change in valuation basis, which impacts reserves for policies written from years XXXX to XXXX is permitted under the revisions to VM-20: Requirements for Principle-Based Reserves for Life Products and VM -21: Valuation Manual Requirements for Principle-Based Reserves for Variable Annuities (VM-21). There have been no adjustments to the phase-in period. The amount of phase-in, which has been recognized in unassigned funds is \$_____. The remaining amount to be phased-in is \$_____.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|---|
| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Dale Bruggeman</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Ohio Department of Insurance</u></p> <p>ADDRESS: <u>50W. Town St., 3rd Fl., Ste. 300</u> <u>Columbus, OH 43215</u></p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-26BWG MOD</u> Year <u>2026</u> Changes to Existing Reporting <input checked="" type="checkbox"/> [X] New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input checked="" type="checkbox"/> [X] Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No] <i>***If Yes, complete question below***</i></p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment <input type="checkbox"/> [] Referred To Another NAIC Group <input type="checkbox"/> [] Received For Public Comment <input type="checkbox"/> [] Adopted Date _____ <input type="checkbox"/> [] Rejected Date _____ <input checked="" type="checkbox"/> [X] Deferred Date <u>3/5/2026</u> <input type="checkbox"/> [] Other (Specify) _____</p> |
|--|---|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input type="checkbox"/> [] CROSSCHECKS |
| <input type="checkbox"/> [] QUARTERLY STATEMENT | <input checked="" type="checkbox"/> [X] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input checked="" type="checkbox"/> [X] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input checked="" type="checkbox"/> [X] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the annual statement expense categories and instructions to remove outdated expense terminology and update to reflect the current types of expenses that exist for companies.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to update the expense categories based on a review of the current instructions at the request of comments from industry. This proposal will remove outdated terminology and also update expense categories to reflect current types of expenses. (SAPWG Ref. 2025-33)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY**APPENDIX****INSTRUCTIONS FOR UNIFORM CLASSIFICATIONS OF EXPENSES OF****PROPERTY AND CASUALTY INSURERS**

For the purpose of establishing uniformity in classifications of expenses of property and casualty insurers recorded in statements and reports filed with and statistics reported to Insurance Departments, all such insurers shall observe the instruction set forth below. Refer to *SSAP No. 63—Underwriting Pools* for accounting guidance.

LIST OF OPERATING EXPENSE CLASSIFICATIONS FOR ANNUAL STATEMENT PURPOSES

1. Claim Adjustment Services
 - 1.1 Direct
 - 1.2 Reinsurance Assumed
 - 1.3 Reinsurance Ceded
2. Commission and Brokerage
 - 2.1 Direct excluding contingent
 - 2.2 Reinsurance Assumed excluding contingent
 - 2.3 Reinsurance Ceded excluding contingent
 - 2.4 Contingent—Direct
 - 2.5 Contingent—reinsurance assumed
 - 2.6 Contingent—reinsurance ceded
 - 2.7 Policy and Membership Fees
3. Allowances to Managers and Agents
4. Advertising
5. Boards, Bureaus, and Associations
6. Surveys and Underwriting Reports
7. Audit of Assureds' Records
8. Salary and Related Items
 - 8.1 Salaries
 - 8.2 Payroll taxes
9. Employee Relations and Welfare

10. Insurance
11. Directors' Fees
12. Travel and Travel Items
13. Rent and Rent Items
14. Equipment
15. Cost or Depreciation of EDP Equipment and Software
16. Printing and Stationery
17. Postage, and Telephone and Telegraph, Exchange and Express
18. Legal and Auditing
20. Taxes, Licenses and Fees
 - 20.1 State and Local Insurance Taxes deducting guaranty association credits
 - 20.2 Insurance Department Licenses and Fees
 - 20.3 Guaranty Association Assessments
 - 20.4 Other (excluding Federal Income and Real Estate)
21. Real Estate Expenses
22. Real Estate Taxes
24. Miscellaneous

RULES RELATING TO OPERATING EXPENSE CLASSIFICATIONS

1. CLAIM ADJUSTMENT SERVICES

1.1 Direct

Include: The Following Expenses When in Connection With the Investigation and Adjustment of Policy Claims:

Independent Adjusters: Fees and expenses of independent adjusters or settling agents

Legal: Fees and expenses of lawyers for legal services in the defense, trial, or appeal of suits, or for other legal services

Bonds: Premium costs of bonds

Appeal Costs and Expenses: Appeal bond premiums, charges for printing records, charges for printing briefs, court fees and incidental to appeals

General Court Costs and Fees: Entry fees and other court costs, and other fees not includible in Losses (Note: Interest and costs assessed as part of or subsequent to judgment are includible in Losses.)

Medical Testimony: Fees and expenses of medical witnesses of attendance or testimony at trials or hearings ("Medical" includes physicians, surgeons, chiropractors, chiropodists, dentists, osteopaths, veterinarians, and hospital representatives.)

Expert Witnesses: Fees and expenses of expert witnesses for attendance or testimony at trials or hearings

Lay Witnesses: Fees and expenses of lay witnesses for attendance or testimony at trials or hearings

Services of Process: Constables, sheriffs, and other fees and expenses for service of process, including subpoenas

Transcripts of Testimony: Stenographers' fees and fees for transcripts of testimony

Medical Examinations: Fees for medical examinations, fees for performing autopsies, fees for impartial examination, x-rays, etc., for the purpose of trial and determining questions of liability (This does not include fees for medical examinations, x-rays, etc., made to determine necessary treatment, or made solely to determine the extent or continuation of disability, or first aid charges, as such fees and charges are includible in Losses.)

Miscellaneous: Costs of appraisals, expert examinations, surveys, plans, estimates, photographs, maps, weather reports, detective reports, audits, credit or character reports, watchmen (Charges for hospital records and records of other kinds, notary fees, certified copies of certificates and legal documents, charges for Claim Adjustment Services by underwriting syndicates, pools, and associations)

Exclude: Compensation to employees (see Salaries)

Expenses of salaried employees (see Travel and Travel Items)

Items includible in Allowances to Managers and Agents

Payments to State Industrial Commissions (see Taxes, Licenses, and Fees)

Payments to claim adjusting organizations except where the expense is billed specifically to individual companies (see Boards, Bureaus, and Associations)

Cost of services of medical examiners for underwriting purposes (see Surveys and Underwriting Reports)

Salvage and subrogation recovery expense, rewards, lost and found advertising, expenses for disposal of salvage (Such expenses shall be deducted from salvage.)

Any expenses which by these instructions are includible elsewhere

Separation of Claim Adjustment Services:

The Statistical Plans filed by certain rating bureaus contain definitions of "Allocated Loss Adjustment Expenses" which exclude for rating purposes certain types of claim adjustment services as defined herein. For the lines of business thus affected, companies that are members of such rating bureaus shall maintain records necessary to the reporting of Claim Adjustment Services—Direct, as follows:

- a. As defined in Statistical Plans
- b. Other than as defined in Statistical Plans

1.2 Reinsurance Assumed

Include: Claim adjustment expenses in bills rendered by ceding companies

1.3 Reinsurance Ceded

Include: Claim adjustment expenses billed to assuming entities

2. COMMISSION AND BROKERAGE

2.1 Direct excluding contingent

Include: All payments, reimbursements and allowances, on direct writings, computed as a percentage of premiums for production, management, or other services to:

| | |
|------------------------------|----------------------------|
| Managers | Office Agents |
| Supervising General Agents | Brokers |
| General Agents | Solicitors |
| Regional and District Agents | Other producers and agents |
| Local Agents | |

Commissions and brokerage to employees when the activities for which the commissions are paid are not a part of their duties as employees.

Exclude: Compensation to employees except as noted above (see Salaries)

Allowances, reimbursements and payments not computed as a percentage of premiums (see Allowances to Managers and Agents)

Expenses involved in transactions between insurance companies (see Joint Expenses; Commission and Brokerage—Reinsurance Assumed and Ceded; Expenses for Account of Another, and Income from Special Services)

Contingent commission (see Commission and Brokerage—Contingent)

Fees of investment counsel (see Legal and Auditing)

Expenses includible in Boards, Bureaus, and Associations

Taxes on premiums (see Taxes, Licenses, and Fees)

Commission received for special services such as loss adjustment and inspection not related to policies issued by the company (see Income from Special Services)

2.2 Reinsurance Assumed excluding contingent

Commission and allowances of every nature on reinsurance assumed including tax and board allowances and reinsurance brokerage, except contingent commission, should be included in Commission and Brokerage—Reinsurance Assumed

Exception: Where commission and allowances under reinsurance assumed take the form of accurate proportions of actual expenses incurred, as in some quota share and pooling arrangements, entries shall be made to the actual expenses.

2.3 Reinsurance Ceded excluding contingent

Commission and allowances of every nature on reinsurance ceded including tax and board allowances and reinsurance brokerage, except contingent commission, shall be included in Commission and Brokerage—Reinsurance Ceded.

Exception: Where commission and allowances under reinsurance ceded take the form of accurate proportions of actual expenses incurred, as in some quota share and pooling agreements, entries shall be made to the actual expenses.

Commissions and fee allowances received from FEMA should be reported consistent with reinsurance ceding commissions. Refer to *SSAP No. 62R—Property and Casualty Reinsurance*.

Examples Relating to the Treatment of Commission on Reinsurance Assumed and Reinsurance Ceded

1. Company A cedes business to Company B under a treaty specifying a commission of 35% and an allowance for taxes and board fees of 5%. On the statement filed by Company A, both the 35% and the 5% shall be entered in Commission and Brokerage—Reinsurance Ceded. On the statement filed by Company B, both the 35% and the 5% shall be entered in Commission and Brokerage—Reinsurance Assumed.

2. Company A cedes 10% of all of its business to Company B under an agreement whereby Company B pays 10% of all actual expenses on such business incurred by Company A. Assume the expenses of Company A on the business reinsured as follows:

| | Paid on Written Business |
|-----------------------------------|--------------------------|
| Commission and Brokerage - Direct | \$ 100,000 |
| Salaries | 30,000 |
| Rent and Rent Items | 7,000 |
| Printing and Stationary | 7,000 |
| Postage, etc. | 5,000 |
| Surveys and Underwriting Reports | 8,000 |
| | 0 |
| Total | <u>\$ 157,000</u> |

(NOTE: These are not intended to show the complete list of expenses involved but are given only for illustrative purposes.)

On the statement filed by Company A the commission and allowances by Company B shall be credited as follows:

| | Paid on Written Business |
|----------------------------------|--------------------------|
| Commission and Brokerage - Ceded | \$ 10,000 |
| Salaries | 3,000 |
| Rent and Rent Items | 700 |
| Printing and Stationary | 700 |
| Postage, etc. | 500 |
| Surveys and Underwriting Reports | 800 |
| Total | <u>\$ 15,700</u> |

On the statement filed by Company B the commission and allowances made to Company A shall be debited as follows:

| | Paid on Written Business |
|--|--------------------------|
| Commission and Brokerage – Reinsurance Assumed | \$ 10,000 |
| Salaries | 3,000 |
| Rent and Rent Items | 700 |
| Printing and Stationary | 700 |
| Postage, etc. | 500 |
| Surveys and Underwriting Reports | 800 |
| Total | <u>\$ 15,700</u> |

2.4 Contingent Direct

Contingent or profit commission paid

Contingent or profit commission received

Contingent commission to employees when the activities for which the contingent commission is paid is not a part of their duties as employees

2.5 Contingent reinsurance assumed

2.6 Contingent reinsurance ceded

2.7 Policy and Membership Fees

Include: Policy and membership fees retained by or paid to agents

Policy and membership fees to employees when the activities for which the policy and membership fees are paid are not a part of their duties as employees

3. ALLOWANCES TO MANAGERS AND AGENTS

Include: Net allowances, reimbursements and payments for expenses of every nature, not computed as a percentage of premiums, to managers, agents, brokers, solicitors, and other producers

Exclude: Compensation to employees (see Salaries)

Expenses of salaried employees (see Travel and Travel Items)

Expenses of management where one insurance company has been appointed manager for another (see Joint Expenses; Commission and Brokerage—Reinsurance Assumed and Ceded; and Expenses for Account of Another)

Contingent commission (see Commission and Brokerage—Contingent)

Policy and membership fees (see Commission and Brokerage—Policy and Membership Fees)

Expenses in connection with owned real estate (see Real Estate Expenses)

Amounts representing exact reimbursements for Losses, Taxes, Licenses and Fees, Boards, Bureaus and Associations, and Advertising, where only the minimum space required by law is taken

Amounts representing exact reimbursements for Claim Adjustment Services, Surveys and Underwriting Reports and Audit of Assureds' Records when these services are performed by others than employees of managers, agents, brokers, solicitors or other producers

4. ADVERTISING

Include: Services of advertising agents

Public relations counsel

Space in newspapers, periodicals, billboards, programs, and other publications including electronic formats

Circulars, pamphlets, calendars, and literature issued for advertising or promotional purposes

Drawings, plates, etchings, etc., in connection with advertising

All charges for printing, paper, etc., in bills covering advertising

Media broadcasts (e.g., radio, television, etc.)

Prospect and mailing lists

Signs, frames, medals, etc., for agents

Souvenirs for general distribution

House organs (in-house periodical or employee periodical) and similar publications distributed to others than employees

Advertising required by law when more than the minimum space required to comply with the law is taken

Exclude: Compensation to employees (see Salaries)

Items includible in Travel and Travel Items, Claim Adjustment Services, and Boards, Bureaus, and Associations

Cost of literature, booklets, placards, signs, etc., issued solely for accident and loss prevention (see Surveys and Underwriting Reports)

Advertising and business development expenses allowed, reimbursed or paid to managers, agents, brokers, solicitors, and other producers (see Allowances to Managers and Agents)

Cost of help wanted advertising (see Employee Relations and Welfare)

Cost of advertising in connection with owned real estate (see Real Estate Expenses)

Cost of house organs (in-house periodical or employee periodical) and similar publications for the use of employees (see Printing and Stationery)

Donations to organized charities (see Miscellaneous)

Cost of souvenirs not generally distributed (see Travel and Travel Items)

5. **BOARDS, BUREAUS, AND ASSOCIATIONS**

Include: Dues, assessments, fees and charges of:

Underwriting boards, rating organizations, statistical agencies, inspection and audit bureaus

Underwriters' advisory and service organizations

Accident and loss prevention organizations

Claim organizations

Specific payments to boards, bureaus and associations for rate manuals, revisions, fillers, rating plans, and experience data

Exclude: Cost of inspection, engineering, or accident and loss prevention billed specifically to individual companies (see Surveys and Underwriting Reports)

Loss adjustment expenses billed specifically to individual companies (see Claim Adjustment Services)

Allowances under reinsurance contracts for board and bureau expenses (see Commission and Brokerage—Reinsurance Assumed and Ceded)

Payments to State Industrial Commissions (see Taxes, Licenses, and Fees)

Payments into State Security Funds (see Taxes, Licenses, and Fees)

Commission and Brokerage, Claim Adjustment Services, and Taxes, Licenses and Fees of underwriting syndicates, pools, and associations

Cost of Survey, credit, moral hazard, character, and commercial reports obtained for underwriting purposes (see Surveys and Underwriting Reports)

Cost of commercial reporting services (see Surveys and Underwriting Reports)

Dues and subscriptions to social or civic clubs or affairs (see Travel and Travel Items)

Dues and subscriptions to accounting, legal, actuarial or similar societies and associations (see Travel and Travel Items)

6. SURVEYS AND UNDERWRITING REPORTS

Include: Survey, credit, moral hazard, character, and commercial reports obtained for underwriting purposes

Commercial reporting services

Appraisals for underwriting purposes

Fire records

Inspection, engineering, and accident and loss prevention billed specifically

Literature, booklets, placards, signs, etc., issued solely for accident and loss prevention

Maps and corrections

Services of medical examiners for underwriting purposes

Exclude: Compensation to employees (see Salaries)

Expenses of salaried employees (see Travel and Travel Items)

Items includible in Boards, Bureaus, and Associations, Claim Adjustment Services, and Allowances to Manager and Agents

Cost of character or credit reports on employees or applicants for employment (see Employee Relations and Welfare)

Fees for physical examination of employees or applicants for employment (see Employee Relations and Welfare)

Income from inspections, which shall be classified in accordance with the instruction "Income from Special Services"

7. AUDIT OF ASSURED'S RECORDS

Include: Auditing fees and expenses of independent auditors for auditing payrolls and other premium bases

Exclude: Compensation to employees (see Salaries)

Expenses of salaried employees (see Travel and Travel Items)

Items includible in Claim Adjustment Services

Items includible in Allowances to Managers and Agents

8. SALARY AND RELATED ITEMS**8.1 Salaries**

Include: Salaries, bonus, overtime, contingent compensation, pay while on leave, dismissal allowance, pay while training and other compensation of employees

Commission and brokerage to employees when the activities for which the commission is paid are a part of their duties as employees

Exclude: Salaries or wages of janitors, caretakers, maintenance workers and agents paid in connection with owned real estate (see Real Estate Expenses)

8.2 Payroll Taxes

Include: Employer FICA, FUTA, SUTA, and other federal state and local payroll taxes~~Old age benefit taxes~~

~~Unemployment insurance taxes~~

Exclude: Payroll taxes includible in Real Estate Taxes

9. EMPLOYEE RELATIONS AND WELFARE**A. Pensions and Insurance Benefits for Employees**

Include: Cost of retirement insurance

Payments or appropriations to funds irrevocably devoted to the payment of pensions or other employees' benefits

Pensions or other retirement allowances

Accident, health and hospitalization insurance for employees

Group life insurance for employees

Workers' compensation insurance

Payments to or on behalf of employees under self-insurance

Any other insurance for the benefit of employees

Exclude: Cost of insurance on lives of employees when the ~~company~~ reporting entity is the beneficiary

Payments or appropriations to pension funds not irrevocably devoted to the payment of pensions or other employees' benefits (such payments or appropriations shall not appear among expenses.)

Items includible in Real Estate Expenses

All other types of insurance premiums

B. All Other

- Include:
- Advertising—help wanted
 - Training and welfare of employees
 - Physical examinations of employees or applicants for employment
 - Character or credit reports on employees or applicants for employment
 - Gatherings, outings and entertainment for employees
 - Visiting nurse service for or on behalf of employees
 - Medical and hospital bills for employees (not covered by 9A)
 - Direct payments, other than salaries, to employees for injury and sickness (not covered by 9A)
 - ~~Supper money~~ Overtime meals
 - Donations to or on behalf of employees
 - Food and catering for employees
- Exclude:
- Salaries, bonus, overtime, contingent compensation, pay while on leave, dismissal allowances, pay while training and other compensation of employees (see Salaries)
 - Items includible in Real Estate Expenses
 - Cost of house organs (in-house periodical or employee periodical) and similar publications (see Advertising, and Printing and Stationery)

10. INSURANCE

- Include:
- Fidelity or surety bonds covering employees and agents
 - Burglary, and robbery insurance premiums
 - Public liability insurance premiums (Excluding owned Real Estate)
 - Premiums for insurance on office contents
 - Cost of insurance on automobiles
 - All other insurance premiums not specifically provided for in other operating accounts
- Exclude:
- Items includible in Employee Relations and Welfare
 - Items includible in Real Estate expenses

11. DIRECTORS' FEES

Include: Directors' fees and other compensation of directors for attendance at board or committee meetings

Other fees, compensation, and expenses paid to directors

Exclude: Commission to directors for the production of business (see Commission and Brokerage—Direct)

12. TRAVEL AND TRAVEL ITEMS

Include: Transportation, hotel, meals, postage, shipping, delivery, telephone, ~~telegraph, express~~ and incidental living expenses of employees while traveling

Expenses for transfer of employees

Depreciation, repairs and other operating expenses of automobiles

Rent of automobiles

Fees for automobile ~~license plates~~ registration

Cost of transportation, hotel, meals and entertainment of guests

Cost of favors and presents given or extended to others than employees

Cost of souvenirs not generally distributed

Dues and subscriptions to social or civic clubs or affairs

Dues and subscriptions to accounting, legal, actuarial, or similar societies and associations

Exclude: Items includible in Salaries, Advertising, Commission and Brokerage, Taxes, Licenses and Fees, Boards, Bureaus and Associations, and Equipment

Cost of gatherings, outings, etc., and entertainment for employees (see Employee Relations and Welfare)

Travel and Travel Items expenses paid, reimbursed, or allowed to managers, agents, brokers, solicitors and other producers (see Allowances to Managers and Agents)

Items includible in Real Estate Expenses

Donations to organized charities (see Miscellaneous)

Cost of souvenirs for general distribution (see Advertising)

13. RENT AND RENT ITEMS

- Include:
- Rent of home office and branch offices
 - Rent for space occupied in buildings owned
 - Light, heat, power and water charges in leased premises
 - Interest, taxes, etc., paid in lieu of rent for leased premises
 - Cost of alternations and repairs of leased premises
 - Rent of storage, safekeeping and warehouse space
 - Rent of safe deposit boxes
 - Rent of post office boxes
 - Time clock service charges
 - Cost of cleaning, towels, ice, water, electric lamp replacements and other expenses incidental to office maintenance
- Exclude:
- Compensation to employees (see Salaries)
 - Rent of automobiles (see Travel and Travel Items)
 - Rent allowed, reimbursed, or paid to managers, agents, brokers, solicitors and other producers (see Allowances to Managers and Agents)
 - Items includible in Real Estate Expenses
 - Rent income from owned real estate

14. EQUIPMENT

- Include:
- Rent and repairs of furniture, equipment, and office machines (including printers' equipment, postage machines and data processing equipment)
 - Depreciation on furniture, equipment and office machines (including printers' equipment, postage machines and data processing equipment)
- Exclude:
- Compensation to employees (see Salaries)
 - Rent, repairs and depreciation of automobiles (see Travel and Travel Items)
 - Cost of insurance on automobiles (see Insurance)
 - Cost of alterations and repairs of leased premises (see Rent and Rent Items)
 - Equipment expenses allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers (see Allowances to Managers and Agents)
 - Items includible in Real Estate Expenses

16. PRINTING AND STATIONERY

Include: Printing, stationery and office supplies such as: letterhead, envelopes, paper stock, printed forms or manuals, adding machine tape, ~~carbon paper~~, binders and posts, ~~photostatic~~ copies, pencils, pens, leads, ink, glue, stamps and stamp pads, staplers, staples, clips and pins, desk top equipment (calendars, trays, etc.), waste baskets, analysis pads, ledgers, journals, minute books, etc.

Policies and policy forms

House organs (in-house periodical or employee periodical) and similar publications for the use of employees

Books, newspapers and periodicals including investment, tax and legal publications and services whether in print or electronic format

Exclude: Compensation to employees (see Salaries)

Specific payments to boards, bureaus and associations for rate manuals, revisions, fillers, rating plans and experience data (see Boards, Bureaus and Associations)

Literature, booklets, placards, signs, etc., issued solely for accident and loss prevention (see Surveys and Underwriting Reports)

Items includible in Claim Adjustment Services

Items includible in Advertising

Printers' equipment in company owned printing departments (see Equipment)

Printing and stationery allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers (see Allowances to Managers and Agents)

House organs (in-house periodical or employee periodical) and similar publications distributed to others than employees (see Advertising)

Commercial reporting services (see Surveys and Underwriting Reports)

Items includible in Real Estate Expenses

17. ~~POSTAGE, AND TELEPHONE AND TELEGRAPH, EXCHANGE AND EXPRESS~~

Include: ~~Express, freight, shipping, delivery,~~ and cartage

Postage

Cost of telephone ~~and telegrams, cable, radiograms and teletype~~

Bank charges for collection and exchange

Exclude: Compensation to employees (see Salaries)

Rent, repairs and depreciation of postage machines (see Equipment)

Postage, shipping, delivery, and telephone, ~~telegraph and express~~ of employees while traveling (see Travel and Travel Items)

Postage, ~~shipping, delivery, and~~ telephone ~~and telegraph, exchange, and express~~ allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers (see Allowances to Managers and Agents)

Profits or losses resulting from exchange on remittances to Home Office by a United States Branch. Such profits or losses shall not be included in expenses

Items includible in Real Estate Expenses

Rent of post office boxes (see Rent and Rent Items)

18. LEGAL AND AUDITING

- Include:
- Legal retainers, fees and other legal expenses (except on losses and salvage)
 - Auditing fees of independent auditors for examining records of home and branch offices
 - Cost of services of tax experts
 - Fees of investment counsel
 - Registrar fees
 - Custodian fees
 - Trustees' fees
 - Transfer agent fees
 - Fees and expenses of others than employees, for collecting balances
 - Notary fees
- Exclude:
- Compensation to employees (see Salaries)
 - Expenses of salaried employees (see Travel and Travel Items)
 - Items includible in Claim Adjustment Services
 - Items includible in Real Estate Expenses
 - Cost of auditing of assureds' records (see Audit of Assureds' Records)

20. TAXES, LICENSES AND FEES

20.1 State and Local Insurance Taxes deducting guaranty association assessment association credits

- Include:
- State, county and municipal taxes, licenses and fees based upon premiums
 - Fire Patrol assessments
 - Payments to State Industrial (or other) Commissions for administration of Workers' Compensation or other State Benefit Acts (including assessments for administering Financial Responsibility Laws) regardless of basis of assessment

Net payments to State Security Funds, Reopened Case Funds, Second Injury Funds and other State Funds, when construed by the ~~company~~ reporting entity as operating expenses, regardless of basis of assessment

Exclude: Allowances for taxes under reinsurance contracts (see Commission and Brokerage Reinsurance Assumed and Ceded)

20.2 Insurance Department Licenses and Fees

Include: Agents' licenses

Certificates of authority, compliance, deposit, etc.

Filing fees

Fees and expenses of examination by insurance departments or other governmental agencies

Exclude: Items includible in Claim Adjustment Services

20.4 All Other (Excluding Federal Income and Real Estate)

Include: Qualifying bond premiums

Statement publication fees

Advertising required by law

Personal property taxes

State income taxes

Capital stock taxes

Business or corporation licenses or fees (not includible under 20.1 or 20.2)

Marine profits taxes

Documentary stamps on reinsurance

Any other taxes not assignable under 20.1, 20.2, and 20.3 and not otherwise excluded

Exclude: Cost of advertising required by law where more than minimum space required to comply with the law is taken. Such expense shall be included in Advertising.

Real estate taxes, licenses and fees (see Real Estate Taxes)

Items includible in Claim Adjustment Services

Fees for automobile license plates (see Travel and Travel Items)

Federal income tax

Sales taxes, etc., included on invoices of vendors. Such taxes are to follow allocation of cost of items purchased.

21. REAL ESTATE EXPENSES

- Include:
- Salaries, wages and other compensation of janitors, caretakers, maintenance workers and agents paid in connection with owned real estate
 - Cost of operating and maintaining owned real estate
 - Cost of insurance in connection with owned real estate
 - Cost of advertising in connection with owned real estate

22. REAL ESTATE TAXES

- Include: Taxes, licenses and fees on owned real estate

24. MISCELLANEOUS

Expenses not listed as includible in other operating expense classifications, and not analogous thereto, shall be included in "Miscellaneous." Specifically, the following shall be included:

- Cost of tabulating service when such service is rendered by outside organizations
- Amounts received and handled in accordance with the Instruction "Income from Special Services"
- Donations to organized charities
- Differences between actual amounts paid, and amounts apportioned in accordance with the Instruction "Joint Expenses"

GENERAL INSTRUCTIONS IN CONNECTION WITH OPERATING EXPENSE CLASSIFICATIONS

A. Joint Expenses

Whenever personnel or facilities are used in common by two or more companies, or whenever the personnel or facilities of one company are used in the activities of two or more companies, the expenses involved shall be apportioned in accordance with the instructions relating to Joint Expenses, and such apportioned expenses shall be allocated by each company to the same operating expense classifications as if the expenses had been borne wholly. Any difference between the actual amount paid, and the amount of such apportioned expenses shall be included in the operating expense classification "Miscellaneous."

This instruction does not apply to the allocation of the following, which are covered by separate instructions herein:

Reinsurance commission and allowances (see Commission and Brokerage—Reinsured Assumed and Ceded)

Commission and brokerage paid to managers and agents (see Commission and Brokerage—Direct)

Allowances to managers and agents (see Allowances to Managers and Agents)

Expenses allocable in accordance with the instruction "Income from Special Services"

B. Expenses for Account of Another

Whenever expenses are paid by one company for account of another, the payments shall not appear among the expenses reported by the former and shall be included by the latter in the same expense classifications as if originally paid by it.

C. Income from Special Services

Whenever an insurance company receives compensation for sales or services, such as loss adjustment or inspection not related to policies written by the company, and such compensation is not calculated as a joint expense reimbursement, the amount thereof shall be included in the operating expense classification "Miscellaneous." Where an insurance company pays the compensation, allocation shall be made to the expense classification dictated by the nature of the expense.

Reinsurance commission and allowances (see Commission and Brokerage—Reinsurance Assumed and Ceded)

Expenses incurred for the benefit of companies in the same group or fleet are covered by the instruction "Joint Expenses."

D. Analogous Items

The lists of expenses includible in the operating expense classifications are representative and do not exclude analogous items that are omitted from the lists.

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ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

EXHIBIT 2 – GENERAL EXPENSES

General expense items must be itemized and entered in sufficient detail to indicate their precise nature. General expenses include virtually all of the expenses of a life insurance company other than benefits to policyholders; commissions; and taxes, licenses and fees.

The statutory financial statement provides for two broad categories of general expenses: (1) insurance, subdivided into life insurance, accident and health insurance, and all other lines of business; and (2) investment. In addition, the Analysis of Operations by Lines of business requires allocation of general expenses to more detailed lines of business. The Summary of Operations classifies the investment expense portion of general expenses as an offset to investment income while classifying general insurance expenses separately in the expense section of the summary.

General Expenses Due or Accrued

The amount included in the balance sheet under this caption represents the ~~company's reporting entities'~~ liability for general expenses applicable to the current year that are unpaid at year end. There are a number of guidelines to consider with respect to whether an item represents a liability of the ~~company reporting entity~~ at the statement date. Distinguish between: (1) bills for items purchased or services rendered; and (2) the recognition of accruals for such things as payroll. With respect to accruals, the liability should be established so that each period bears its pro rata share of the expense even though no bill has been received. Accrual payroll, for example, represents the cost for the period from the last payroll to period-end.

Generally, the liability for purchases of supplies and materials should be established as of the receipt date or shipment date if FOB. If a ~~company reporting entity~~ has an irrevocable contract as of the statement date, the liability must be established even though the supplies or materials have not been received.

Functional Costs

General expenses are not to be reported on a functional basis unless specifically permitted and then only if: (1) services are independently organized; (2) rent, salaries and wages, and other major items of direct expense are charted to the functions; and (3) adequate accounting for the functional classifications is maintained. Those expense classifications that companies may specifically report on a functional basis are rent, salaries and wages, other employee and agent welfare and printing and stationery.

Allocation of Expenses

As stated above, companies must allocate general expenses to life insurance, accident and health insurance, or investment expense. The "All Other Lines of Business" category should include the corporate overhead line of business where that normal designation exists. In addition, the Analysis of Operations by Lines of Business requires allocation of general insurance expenses to more detailed lines of business. The *Annual Statement Instructions* discuss the allocation of receipts and expenses to lines of business.

The *Annual Statement Instructions* state that the ~~company reporting entity~~ shall employ those principles and methods that reflect the actual incidence of cost by lines of business. Companies should consider the relative time spent, the extent of usage and the varying volume of work performed. The instructions further state that companies should base the allocations upon objective measurement rather than estimates unless the cost of the measurement clearly outweighs the benefit derived. Where estimates are used, individuals familiar with the nature of the activity should make these estimates and thoroughly responsible persons should review these estimates.

The *Annual Statement Instructions* also state that companies should not use general indices such as premium volume, number of policies and insurance in force unless the incidence of cost is closely related to the indices or there is no more appropriate basis. In no event should such indices be used to distribute claims costs to secondary lines of business.

Report expenses incurred by the reporting entity for uninsured accident and health plans on a gross basis by type of expense. However, administrative fees and expense reimbursements relating to uninsured business are reduced in the general expense and general insurance expenses are to be reported in the Summary of Operations net of such fees and reimbursements.

Expenses for accident and health activities must be allocated between cost containment expenses, Column 2 or all other, Column 3. For guidance on cost containment expenses, refer to *SSAP No. 55—Unpaid Claims, Losses and Loss Adjustment Expenses*.

Whenever personnel or facilities are used in common by two or more companies, or whenever the personnel or facilities of one company-reporting entity are used in the activities of two or more companies, each reporting entity shall assign its share of the expense to the same expense classification as if it had incurred the entire expense. This latter requirement shall not apply to activities such as administration of jointly underwritten group contracts and joint mortality and morbidity studies.

A reporting entity company that pays any affiliated entity (including a managing general agent) for the management, administration, or service of all or part of its business or operations shall allocate these costs to the appropriate expense classification item (salaries, rent, postage, etc.) as if these costs had been borne directly by the company-reporting entity. Management, administration, or similar fees should not be reported as a one-line expense. The company-reporting entity may estimate these expense allocations based on a formula or other reasonable basis.

A company-reporting entity that pays any non-affiliated entity (including a managing general agent) for the management, administration, or service of all or part of its business or operations shall allocate these costs to the appropriate expense classification items as follows:

- a. Payments for claims handling or adjustment services shall be reported as Expense of Investigation and Settlement of Contract Claims, Line 4.5 and allocated to Life, Accident and Health, and/or All Other Lines of Business as appropriate (Columns 1, 2, 3 and/or 4) in Exhibit 2, General Expenses. If the total of such expenses incurred equals or exceeds 10 percent of the total General Expenses Incurred (Line 10), the company-reporting entity shall allocate these costs to the appropriate expense classification item as if these costs had been borne directly by the company-reporting entity.
- b. Payments for services other than claims handling or adjustment services shall be allocated to the appropriate expense classifications as if these costs had been borne directly by the company-reporting entity, if the total of such fees paid to the non-affiliate(s) equals or exceeds 10 percent of the total General Expenses Incurred (Line 10). If the total is less than 10 percent, the payments may be reported on Line 7.1.

The total management and service fees incurred attributable to affiliates and non-affiliates shall be reported in the footnote to Exhibit 2, General Expenses in the annual statement blank, and the method(s) used for allocation shall be disclosed in the Notes to Financial Statements. The company-reporting entity shall use the same method(s) on a consistent basis. Refer to *SSAP No. 70—Allocation of Expenses* for accounting guidance.

Column 6 – Fraternal

Transactions related to the fraternal mission.

Line 1 – Rent

Rent expense includes, in addition to rent paid for leased properties, an estimated amount that represents “rent” for properties owned and occupied by the company-reporting entity. Report the offset to this amount as investment income. Net rents received for property under sublease against rent expense.

Include: Rent for all premises occupied by the company-reporting entity, including any adequate rent for occupancy of its own buildings, in whole or in part, except to the extent that allocation to other expense classifications on a functional basis is permitted and used.

Expenses incurred as tenant for light, heat, water, fuel, interest, taxes, building maintenance, alterations and service, etc.

Amortization expense for leasehold improvements as lessee.

Deduct: Rent under sublease.

Line 2 – Salaries and Wages

Salaries and wages, in addition to virtually all direct payments of compensation to employees, should include all payments to directors for attendance at board or committee meetings.

Include: Salaries and wages, bonuses and incentive compensation to employees, overtime payments, continuation of salary during temporary short-term absences, dismissal allowances, payments to employees while in training and other compensation to employees not specifically designated herein, except to the extent that allocation to other expense classifications is permitted and used.

Fees and other compensation to directors for attendance at board or committee meetings and any other fees and compensation paid to them in their capacities as directors or committee members.

Agency compensation other than commissions.

Line 3.11 – Contributions for Benefit Plans for Employees and

Line 3.12 – Contributions for Benefit Plans for Agents



Include: Contributions by company-reporting entity for pension and total and permanent disability benefits, life insurance benefits, accident, health, hospitalization, medical, surgical, or other temporary disability benefits under a self-administered or trusteed plan or for the purchase of annuity or insurance contracts.

Appropriation or any other assignment of funds by company-reporting entity in connection with any benefit plan of the types enumerated herein, e.g., the net periodic postretirement benefit cost, whether it be defined in terms of specified benefits or in terms of monetary amounts.

Earned amounts related to employee stock option plans.

Exclude: Contributions or appropriations for past service if reported in Surplus Account.

Benefit payments (to be reported in the appropriate benefit item of the Summary of Operations when reserves are included in Page 3, Lines 1 and 2, and as a separate item in the Summary of Operations when the liability is included in Page 3, Line 21).

- Line 3.21 – Payments to Employees Under Non-Funded Benefit Plans and
- Line 3.22 – Payments to Agents Under Non-Funded Benefit Plans

Include: Payments by company under a program for pension, stock options, purchase and award plans (including change in quoted market value), and total and permanent disability benefits, death benefits, accident, health hospitalization, medical, surgical, or other temporary disability benefits, where no contribution or appropriation is made prior to the payment of the benefit.

Refer to *SSAP No. 12—Employee Stock Ownership Plans* and *SSAP No. 104R—Share-Based Payments*.

- Line 3.31 – Other Employee Welfare and
- Line 3.32 – Other Agent Welfare

Expenses included in this line may be reported on a functional basis.

Include: Meals to employees. Companies so desiring may exclude this item from Other Employee Welfare and Other Agent Welfare and include it under Details of Write-ins Aggregated on Line 9.3 for Expenses.

Contributions to employee associations or clubs.

Expense and maintenance of recreation grounds.

Payments to employees and agents in military service.

Expense of periodical medical or dental examinations or of medical dispensary, convalescent home or sanitarium for employees and agents.

- Line 4.1 – Legal Fees and Expenses

Include: Cost of outside counsel, as well as court costs to the extent that these costs do not relate to the claims or investment functions, penalties, and all fees or retainers for legal services or expenses in connection with matters before administrative or legislative bodies.

Exclude: Salaries and expenses of ~~company~~ reporting entity personnel.

Legal expenses in connection with investigation, litigation and settlement of contract claims.

Legal fees specifically associated with real estate transactions.

- Line 4.2 – Medical Examination Fees
- Include: Fees to medical examiners in connection with new business, reinstatements, contract changes and applications for employment.
- Exclude: Fees for medical examinations for the welfare of employees and agents.
- Medical examination fees in connection with the investigation, litigation and settlement of contract claims.
- Line 4.3 – Inspection Report Fees
- Include: Fees for inspection reports in connection with new business, reinstatements, contract changes and applications for employment.
- Cost of services furnished by the Medical Information Bureau (M.I.B.).
- Exclude: Salaries of inspectors.
- Inspection report fees in connection with the investigation, litigation and settlement of contract claims.
- Assessment for expenses of M.I.B. Executive Committee.
- Line 4.4 – Fees of Public Accountants and Consulting Actuaries
- Exclude: Fees for examinations made by State Departments.
- Expense of internal audits by company employees.
- Line 4.5 – Expense of Investigation and Settlement of Policy Claims
- Include: Payment to other than employees of fees and expenses for the investigation, litigation and settlement of policy claims.
- Exclude: Payments to a policyholder, agent, broker, or a third party for administration of group claims.
- Line 5.1 – Traveling Expenses
- Include: Traveling expense of officers, other employees, directors and agents, including hotel, meals, telephone, telegraph and postage charges incurred while traveling.
- Amounts allowed employees for use of their own cars on company business.
- The cost of, or depreciation on, and maintenance and running expenses of company-owned automobiles.
- Exclude: Such expenses properly chargeable to Real Estate Expenses (Line 9.1) or required to be reported in Lines 7.1 and 7.3.

Line 5.2 – Advertising

- Include:
- All costs relating to advertising for new insurance business except salaries and expenses of an advertising department.
 - Newspaper, magazine and trade journal advertising for the purpose of solicitation and conservation of business, whether in print or electronic formats.
 - Billboard, sign and directory advertising.
 - Television, radio broadcasting and motion picture advertising, excluding subjects dealing wholly with health and welfare.
 - All canvassing or other literature, such as pamphlets, circulars, leaflets, contract/certificate illustration forms and other sales aids, printed material, etc., prepared for distribution to the public by agents, ~~or~~ through the mail or electronic format for purposes of solicitation and conservation of business.
 - All calendars, blotters, wallets, advertising novelties, etc., for distribution to the public.
 - Printing, paper stock, etc., in connection with advertising.
 - Prospect and mailing lists when used for advertising purposes.
 - Fees and expenses of advertising agencies related to advertising.
- Exclude:
- Pamphlets on health, welfare and educational subjects.
 - Advertising required by law, regulation or ruling except to the extent that it substantially exceeds the space required for compliance.
 - Salaries and expenses of advertising department.
 - Help-wanted advertisements.
 - Advertising in connection with investments.

Line 5.3 – Postage, ~~Express, Telegraph~~ and Telephone

- Include:
- Freight and cartage.
 - Postage ~~Cables, radiograms and teletype.~~
 - Charges for use, installation and maintenance of related equipment if not included elsewhere.

Line 5.4 – Printing and Stationery

Expenses included in this line may be reported on a functional basis.

Include: Contract/certificate forms, riders, supplementary contracts, applications, etc., rate books, instruction manuals, ~~punch cards~~, house organs (in-house periodical or employee periodical), and all other printed material which is not required to be included in any other expense classification.

Office supplies.

Pamphlets on health, welfare and educational subjects.

Annual reports to policyholders/members and stockholders if not included in Line 5.2.

Line 5.5 – Cost or Depreciation of Furniture and Equipment

The general practice with respect to “Cost or depreciation of furniture and equipment” is to either: (1) charge depreciation to this expense classification and write off the remaining asset balance to surplus as a nonadmitted asset; or (2) charge expenditures for furniture and equipment directly to expense, in which case, those expenditures would be included in this classification.

Include: The cost or depreciation of office machines except for such charges as may be reported in Line 5.3.

Exclude: The cost or depreciation of equipment used by employees handling maintenance and repair work on company-occupied property.

Line 5.6 – Rental of Equipment

Include: Rental of office machines except for such charges as may be reported in Line 5.3.

Line 5.7 – Cost or Depreciation of EDP Equipment and Software

Include: Depreciation and amortization expense for electronic data processing equipment and operating and non-operating systems software.

Refer to *SSAP No. 16R—Electronic Data Processing Equipment and Software* for accounting guidance.

Line 6.1 – Books and Periodicals

Include: Books, newspapers, periodicals, etc., including investment, tax and legal publications and information services, and including all such material for company's reporting entity's law department and libraries whether in print or electronic format.

Line 6.2 – Bureau and Association Fees

Include: All dues and assessments of organizations of which the company reporting entity is a member.

All dues for employees' and agents' memberships on the company's reporting entities' behalf.

- Exclude: Contributions in connection with scientific, disease prevention, or other activity directly pertaining to the welfare of policyholders and the public.
- Line 6.3 – Insurance, Except on Real Estate
- Include: Premiums for Workers' Compensation, burglary, holdup, forgery and public liability insurance, fidelity or surety bonds, insurance on contents of company-occupied buildings and all other insurance or bonds not included elsewhere.
- Line 6.4 – Miscellaneous Losses
- Include: Uncollectible losses due to deficiencies, defalcations, robbery, or forgery, except those offset by bonding companies' payments.
- Workers' Compensation benefits not covered by insurance.
- Other uninsured losses not included elsewhere.
- Exclude: Capital and investment losses.
- Line 6.5 – Collection and Bank Service Charges
- Include: Collection charges on checks and drafts and charges for checking accounts and money orders.
-
- Credit card fees.
- Exclude: Foreign exchange losses on funds transferred in or out of the country (include in Exhibit of Capital Gains and (Losses), Line 10, Column 2).
- Line 6.6 – Sundry General Expenses
- Amounts paid to agents for administering group, credit, or individual blocks of business.
- Include: Direct expense of local agency meetings, luncheons and dinners.
- Tabulating service rendered by outside organizations.
- Gifts and donations.
- Any portion of commissions and expense allowances on reinsurance assumed for group business that represents specific reimbursement of expenses.
- Reimbursement to another insurer for expense of jointly underwritten group contracts.
- Exclude: Any one type of expense that would represent more than 25 percent of the total for this line. Such items should be reported on Line 9.3.
- Deduct: Any portion of commissions and expense allowances on reinsurance ceded for group business that represents specific reimbursement of expenses.
- Reimbursement from other insurers for expense of jointly underwritten group contracts.

- Line 6.7 – Group Service and Administration Fees
- Include: Administration fees, service fees, or any other form of allowance, reimbursement of expenses, or compensation (other than commissions) to agents, brokers, applicants, policyholders or third parties in connection with the solicitation, sale, issuance, service and administration of group business.
- Line 6.8 – Reimbursements by Uninsured Plans
- Report as a negative amount, administrative fees, direct reimbursement of expenses, or other similar receipts or credits attributable to uninsured plans and the uninsured portion of partially insured plans.
- Line 7.1 – Agency Expense Allowance
- Include: All bona fide allowances for agency expense, but not allowances constituting additional compensation.
- Line 7.2 – Agents' Balances Charged Off (Net)
- Include: Agents' balances charged off less any amounts recovered during the year.
- Line 7.3 – Agency Conferences Other Than Local Meetings
- Include: Cost of banquets and rental of meeting rooms.
- Expenses of all persons traveling to conferences and their expenses at conferences.
- Line 8.1 – Official Publication (Fraternal Benefit Societies Only)
- Expenses incurred by a fraternal benefit society for publications related to the society and its fraternal mission. Does not include publications related to the insurance operations.
- Line 8.2 – Expense of Supreme Lodge Meetings (Fraternal Benefit Societies Only)
- Expenses incurred by a fraternal benefit society for supreme lodge meetings of the society and its fraternal mission. Does not include meetings related to the insurance operations.
- Line 9.1 – Real Estate Expenses
- Include: The cost of repairs, maintenance, service, and operation of all real estate properties including insurance whether occupied by the ~~company~~ reporting entity or not; salaries and other compensation of managing agents and their employees; expenses incurred in connection with rental of such properties; legal fees specifically associated with real estate transactions other than sale; rent, salaries and wages, and other direct expenses of any branch or home office unit engaged solely in real estate work (not real estate and mortgages combined).
- Salaries or wages of janitors, caretakers, maintenance workers and agents paid in connection with owned real estate.
- Exclude: Salaries and wages of any other home office, general branch office, or investment branch office employees. These should be charged to salaries and wages, where they will automatically be subject to allocation as "insurance" or

“investment,” in Exhibit 2. The same rule applies to other expenses or charges associated with the activities of such employees.

Line 9.2 – Investment Expenses Not Included Elsewhere

Include: Only items for which no specific provision has been made elsewhere, e.g., contributions or assessments for bondholders’ protective committees, fees of investment counsel, custodian and trustee fees.

All other costs including internal costs or costs paid to an affiliated company related to origination, purchase or commitment to purchase bonds.

Exclude: Home office salaries and expenses on account of investment work, salaries and expenses of mortgage loan branch offices.

Legal fees and expenses.

Real Estate expenses properly chargeable to Line 9.1.

Brokerage and other related fees; to the extent they are included in the actual cost of a bond upon acquisition. Refer to SSAP No. 26R.

Line 9.3 – Aggregate Write-ins for Expenses

Enter the total of the write-ins listed in schedule Details of Write-ins Aggregated at Line 9.3 for Expenses.

Line 10 – General Expenses Incurred

The sum of Columns 1, 2, 3 and 4 should agree with Page 4, Line 23.

Column 5 should agree with Exhibit of Net Investment Income, Line 11, Column 2.

Column 2 plus Column 3 should agree with Schedule H, Part 1, Line 4 plus Line 8, Column 1 amount.

Sum of Columns 1 and 4 should equal the sum of Line 23, Column 1 for the following pages:

Analysis of Operations by Lines of Business – Individual Life Insurance

Analysis of Operations by Lines of Business – Group Life Insurance

Analysis of Operations by Lines of Business – Individual Annuities

Analysis of Operations by Lines of Business – Group Annuities

Sum of Columns 2 and 3 should equal Line 23, Column 1 for the Analysis of Operations by Lines of Business – Accident and Health.

Details of Write-ins Aggregated on Line 9.3 for Expenses

List separately all expenses for which there is no pre-printed line on Exhibit 2.

Include: Any type of expense that would represent more than 25 percent of Line 6.6, Sundry General Expenses.

Adjustments due to fluctuations in foreign exchange rates.

ANNUAL STATEMENT INSTRUCTIONS – HEALTH**UNDERWRITING AND INVESTMENT EXHIBIT****PART 3 – ANALYSIS OF EXPENSES**

Administrative Services Contracts (ASC) and Administrative Services Only (ASO) commissions, expenses and taxes paid by the administrator to administer such plan shall be reported on a gross basis by type of expense. General expense items must be itemized and entered in sufficient detail to indicate their precise nature. Expenses are not reported on a functional basis, except to the extent specifically permitted herein and only if: (1) services are independently organized, (2) rent, salaries and wages, and other major items of expense directly incident thereto, but not necessarily including the cost of employee benefit plans and Social Security taxes, are charged to function, and (3) adequate accounting thereof is maintained. Whenever personnel or facilities are used in common by two or more companies, or whenever the personnel or facilities of one company are used in the activities of two or more companies, each company shall assign its share of the expense to the same expense classification as if it had incurred the entire expense. This latter requirement shall not apply to activities such as administration of jointly underwritten group contracts and joint mortality and morbidity studies.

Costs for managed care activities must be allocated between claim adjustment expenses and general administrative expenses. Claim adjustment expenses should be allocated to either cost containment expenses, Column 1 or other claim adjustment expenses, Column 2, in accordance with *SSAP No. 55—Unpaid Claims, Losses and Loss Adjustment Expenses*.

Other costs such as network development costs, provider contracting costs and other similarly related costs should be allocated to Columns 1 through 3 as appropriate, in accordance with *SSAP No. 55*.

A reporting entity that pays any affiliated entity (including a managing general agent) for the management, administration, or service of all or part of its business or operations shall allocate these costs to the appropriate expense classification item (salaries, rent, postage, etc.) as if these costs had been borne directly by the company reporting entity. Do not report management, administration, or similar fees as one-line expenses. The reporting entity may estimate these expense allocations based on a formula or other reasonable basis.

A reporting entity that pays any non-affiliated entity (including a managing general agent) for the management, administration, or service of all or part of its business or operations shall allocate these costs to the appropriate expense classification items as follows:

- a. If the total payments for claims handling or adjustment services equals or exceeds 10 percent of the “Total Claim Adjustment Expenses Incurred,” allocate these costs to the appropriate expense classification items as if these costs had been borne directly by the reporting entity.
- b. Allocate payments for services other than claims handling or adjustment services to the appropriate expense classifications as if these costs had been borne directly by the company reporting entity, if the total of such fees paid to the non-affiliate(s) equals or exceeds 10 percent of Column 3, Line 26. If the total is less than 10 percent, the company reporting entity may report the payments on Line 14.

The total management and service fees incurred attributable to affiliates and non-affiliates shall be reported in the footnote to Underwriting and Investment Exhibit – Part 3, and the method(s) used for allocation shall be disclosed in the Notes to Financial Statements. The reporting entity shall use the same method(s) on a consistent basis. Refer to *SSAP No. 70—Allocation of Expenses* for accounting guidance.

| | | |
|--------|--------------------------------------|---|
| Line 1 | – Rent | |
| | Include: | <p>Rent for all premises occupied by the reporting entity, including any adequate rent for occupancy of its own buildings, in whole or in part, except to the extent that allocation to other expense classifications on a functional basis is permitted and used.</p> <p>Expenses incurred as tenant for light, heat, water, fuel, interest, taxes, building maintenance, alterations and service, etc.</p> |
| | Deduct: | Rent under sublease. |
| | Exclude: | These items for health care delivery. |
| Line 2 | – Salaries, Wages and Other Benefits | |
| | Include: | <p>Salaries and wages, bonuses and incentive compensation to employees, overtime payments, continuation of salary during temporary short-term absences, dismissal allowances, payments to employees while in training and other compensation to employees not specifically designated herein, except to the extent that allocation to other expense classifications is permitted and used.</p> <p>Fees and other compensation to directors for attendance at board or committee meetings and any other fees and compensation paid to them in their capacities as directors or committee members.</p> <p>Agency compensation other than commissions.</p> <p>Payments by reporting entity under a program for pension, stock options, purchases, and award plans (including change in quoted market value) and total and permanent disability benefits, life insurance benefits, accident, health, hospitalization, medical, surgical, or other temporary disability benefits under a self-administered or trustee plan or for the purchase of annuity or insurance contracts.</p> <p>Appropriation or any other assignment of funds by company <u>reporting entity</u> in connection with any benefit plan of the types enumerated herein, (e.g., the net periodic postretirement benefit cost) whether it be defined in terms of specified benefits or in terms of monetary amounts.</p> <p>Payments by reporting entity under a program for pension, stock options, purchases and award plans (including change in quoted market price), total and permanent disability benefits, death benefits, accident, health, hospitalization, medical, surgical, or other temporary disability benefits, where no contribution or appropriation is made prior to the payment of the benefit.</p> <p>Meals to employees.</p> <p>Contributions to employee associations or clubs.</p> <p>Expense and maintenance of recreation grounds.</p> <p>Payments to employees and agents in military service.</p> |

Expense of periodical medical or dental examinations, or of medical dispensary, convalescent home or sanitarium for employees and agents.

Earned amounts related to employee stock ownership plans.

Exclude: Contributions or appropriations for past service if reported in Capital and Surplus Account.

Benefit payments. (To be reported in the appropriate item of the Statement of Revenue and Expenses.)

Refer to *SSAP No. 12—Employee Stock Ownership Plans* and *SSAP No. 104R—Share-Based Payments*.

Line 3 – Commissions

Include: Collection or service fees, policy fees, membership fees and other fees, Commuted renewal commissions.

Line 4 – Legal Fees and Expenses

Include: Court costs, penalties and all fees or retainers for legal services or expenses in connection with matters before administrative or legislative bodies.

Exclude: Salaries and expenses of ~~company~~ reporting entity personnel.

Legal expenses associated with investigation, litigation and settlement of policy claims.

Legal fees specifically associated with real estate transactions.

Line 5 – Certifications and Accreditation Fees

Include: Fees associated with the certification and accreditation of a health plan, including but not limited to, fees paid to Joint Commission on Accreditation of Health Care Organizations (JCAHO); National Commission on Quality Assurance (NCQA); American Association for Health Care Certification (Utilization Review Accreditation Commission (URAC)).

Exclude: Rating agencies and other similar organizations.

Line 6 – Auditing, Actuarial and Other Consulting Services

Exclude: Fees for examinations made by State Departments.

Expense of internal audits by ~~company~~ reporting entity employees.

Line 7 – Traveling Expenses

Include: Traveling expense of officers, other employees, directors and agents, including hotel, meals, telephone, ~~telegraph~~ and postage charges incurred while traveling.

Amounts allowed employees for use of their own cars on company business.

The cost of, or depreciation on, and maintenance and running expenses of company-owned automobiles.

Exclude: Such expenses properly allocated to Real Estate Expenses (Line 21).

Line 8 – Marketing and Advertising

Include: Newspaper, magazine and trade journal advertising for the purpose of solicitation and conservation of business, whether in print or electronic formats.

Billboard, sign and directory advertising.

Television, radio broadcasting and motion picture advertising, excluding subjects dealing wholly with health and welfare.

All canvassing or other literature, such as pamphlets, circulars, leaflets, policy illustration forms and other sales aids, printed material, etc., prepared for distribution to the public by agents, ~~or~~ through the mail or electronic format for purposes of solicitation and conservation of business.

All calendars, blotters, wallets, advertising novelties, etc., for distribution to the public.

Printing, paper stock, etc., in connection with advertising.

Prospect and mailing lists when used for advertising purposes.

Fees and expenses of advertising agencies related to advertising.

Exclude: Pamphlets on health, welfare and educational subjects.

Advertising required by law, regulation or ruling except to the extent that it substantially exceeds the space required for compliance.

Salaries and expenses of advertising department.

Help wanted advertisements.

Advertising in connection with investments.

Line 9 – Postage, ~~Express~~, and Telephone

Include: Freight and cartage, ~~cables, radiograms and teletype.~~

Postage.

Charges for use, installation and maintenance of related equipment if not included elsewhere.

Line 10 – Printing and Office Supplies

Expenses included in this line may be reported on a functional basis.

Include: Policy forms, riders, supplementary contracts, applications, etc., rate books, instruction manuals, ~~punch cards~~, house organs (in-house periodical or employee periodical), and all other printed material that is not required to be included in any other expense classification.

Office supplies, pamphlets on health, welfare and educational subjects, annual reports to policyholders and stockholders if not included in Line 8.

Books, newspapers, periodicals, etc., including investment, tax and legal publications and information services, and including all such material for company's reporting entity's law department and libraries whether in print or electronic format.

Line 11 – Occupancy, Depreciation and Amortization

Include: The amount of depreciation and amortization expense that is directly associated with administrative services. Expenses associated with administrative services include the costs of occupancy to the health entity that are directly associated with health administration. These include the costs of using a facility, fire and theft insurance, utilities, maintenance, lease, etc.

Exclude: The cost or depreciation of equipment used by employees handling maintenance and repair work on company-occupied property.

Line 12 – Equipment

Include: Rental of all office equipment except for such charges as may be reported in Line 9.

Line 13 – Cost or Depreciation of EDP Equipment and Software

Include: Depreciation and amortization expense for electronic data processing equipment, operating software and non-operating software.

Refer to *SSAP No. 16R—Electronic Data Processing Equipment and Software* for accounting guidance.

Line 14 – Outsourced Services Including EDP, Claims, and Other Services

Include: Expenses for administrative services, claim management services, new programming, membership services, and other similar services.

Exclude: Services provided by affiliates under management agreements.

Line 15 – Boards, Bureaus and Association Fees

Include: All dues and assessments of organizations of which the reporting entity is a member.

All dues for employees' and agents' memberships on the reporting entity's behalf.

Exclude: Contributions associated with scientific research, disease prevention, or other activity directly pertaining to the welfare of subscribers and the public.

Line 16 – Insurance, Except on Real Estate

Include: Premiums for Workers' Compensation, burglary, holdup, forgery and public liability insurance, fidelity or surety bonds, insurance on contents of company-occupied buildings and all other insurance or bonds not included elsewhere.

Line 17 – Collection and Bank Service Charges

Include: Collection charges on checks and drafts and charges for checking accounts and money orders.

Credit card fees.

Line 18 – Group Service and Administration Fees

Include: Administration fees, service fees, or any other form of allowance, reimbursement of expenses, or compensation (other than commissions) to agents, brokers, applicants, policyholders or third parties in connection with the solicitation, sale, issuance, service and administration of group business.

Line 19 – Reimbursements by Uninsured Plans

Report as a negative amount, pharmaceutical rebates of uninsured plans that are received or change in due and uncollected by the reporting entity, to the extent that they are in excess of amounts to be remitted to the uninsured plan, administrative fees, direct reimbursement of expenses, or other similar receipts or credits attributable to uninsured health plans and the uninsured portion of partially insured accident and health plans. Deduct administrative fees and related reimbursements from general administrative expenses or claim adjustment expenses if the administrative services provided include services for claim adjustment expenses as defined in *SSAP No. 55—Unpaid Claims, Losses and Loss Adjustment Expenses*.

Refer to *SSAP No. 84—Health Care and Government Insured Plan Receivables* for accounting guidance.

Line 20 – Reimbursements from Fiscal Intermediaries

Report as a negative amount, administrative fees, direct reimbursement of expenses, or other similar receipts or credits attributable to Medicare, ~~CHAMPUS~~ TRICARE and other federal and local governmental agencies.

Line 21 – Real Estate Expenses

Include: The cost of insurance, repairs, maintenance, service, and operation of all real estate properties, whether occupied by the company or not.

Expenses incurred in the rental of real estate properties.

Salaries and other compensation of real estate managing agents and their employees.

Legal fees specifically associated with real estate transactions other than sale; rent, salaries and wages, and other direct expenses of any branch or home office

unit engaged solely in real estate work (not real estate and mortgages combined).

Salaries or wages of janitors, caretakers, maintenance workers and agents in connection with owned real estate.

Exclude: Salaries and wages of any other home office, general branch office, or investment branch-office employees. Charge these amounts to salaries and wages, where they will automatically be subject to allocation as “insurance” or “investment.” The same rule applies to other expenses or charges associated with the activities of such employees.

Line 22 – Real Estate Taxes

Include: Those taxes directly assessed against property owned by the ~~company~~ reporting entity. Canadian and other foreign taxes should be included appropriately.

Line 23.1 – State and Local Insurance Taxes

Include: Assessments of state industrial boards or other boards for operating expenses or for benefits to sick unemployed persons in connection with disability benefit laws or similar taxes levied by states. Canadian and other foreign taxes are to be included appropriately.

Advertising required by law, regulation or ruling, except advertising associated with investments.

State sales taxes, if ~~company~~ reporting entity does not exercise option of including such taxes with the cost of goods and services purchased.

State income taxes.

Line 23.2 – State Premium Taxes

Include: State taxes based on policy reserves, if in lieu of premium taxes. Canadian and other foreign taxes should be included appropriately.

Any portion of commissions or allowances on reinsurance assumed that represents specific reimbursement of premium taxes.

Deduct: Any portion of commissions or allowances on reinsurance ceded that represents specific reimbursement of premium taxes.

Line 23.3 – Regulatory Authority Licenses and Fees

Include: Assessments to defray operating expenses of any state insurance department. Canadian and other foreign taxes should be included appropriately.

Fees for examinations by state departments.

Exclude: Fines and penalties of regulatory authorities. Report these fines and penalties as a separate item on Page 4, Details of Write-ins Aggregated at Line 29 for Other Income or Expenses.

Line 23.4 – Payroll Taxes

Include: Accrued payroll tax including FICA, FUTA, SUTA and other federal, state and local payroll taxes.

Line 23.5 – Other

Include: Guaranty fund assessments and taxes of Canada or of any other foreign country not specifically provided for elsewhere.

Sales taxes, other than state sales taxes, if ~~company~~ reporting entity does not exercise option of including such taxes with the cost of goods and services purchased.

Line 24 – Investment Expenses Not Included Elsewhere

Include: Only items for which no specific provision has been made elsewhere, (e.g., contributions or assessments for bondholders' protective committees, fees of investment counsel, custodian and trustee fees).

All other costs, including internal costs or costs paid to an affiliated company, related to origination, purchase or commitment to purchase bonds.

Exclude: Home office salaries and expenses on account of investment work, salaries and expenses of mortgage loan branch offices.

Legal fees and expenses.

Real Estate expenses properly chargeable to Line 21.

Interest expense incurred for experience rated refunds.

Brokerage and other related fees, to the extent that these are included in the actual cost of a bond upon acquisition. Refer to *SSAP No. 26R—Bonds* for accounting guidance.

Line 25 – Aggregate Write-ins for Expenses

Enter the total of the write-ins listed in schedule Details of Write-ins Aggregated at Line 25 for Expenses.

Line 26 – Total Expenses Incurred

Column 1 + Column 2 should agree with Statement of Revenue and Expenses, Line 20. Column 3 should agree with Statement of Revenue and Expenses, Line 21. Column 4 should agree with the Exhibit of Net Investment Income, Line 11 plus 12.

Details of Write-ins Aggregated on Line 25 for Expenses

List separately all expenses for which there is no pre-printed line.

Enter in Column 3 interest incurred for experience rated refunds.

ANNUAL STATEMENT INSTRUCTIONS – TITLE**OPERATIONS AND INVESTMENT EXHIBIT****PART 3 – EXPENSES**

A company reporting entity that pays management fees to an affiliate (including a managing general agent) shall allocate these costs to the appropriate expense classification item (salaries, rent, postage, etc.) as if these costs had been borne directly by the company reporting entity. Management (or similar) fees should not be reported as a one-line expense. It is appropriate for the company reporting entity to estimate these expense allocations based on a formula or other reasonable basis.

The total management fees and the method(s) used for allocation shall be disclosed in the Notes to Financial Statements. The company reporting entity shall use the same allocation method(s) on a consistent basis. Refer to *SSAP No. 70—Allocation of Expenses* for accounting guidance.

Exclude from investment expenses brokerage and other related fees, to the extent they are included in the actual cost of a bond upon acquisition. Refer to *SSAP No. 26R—Bonds* for accounting guidance.

Include all other internal costs or costs paid to an affiliated company related to origination, purchase or commitment to purchase bonds.

Column 1 – Title and Escrow Operating Expenses - Direct Operations

The amounts shown in this column represent expenses related to the company's reporting entities' title and escrow operations. It does not include losses, loss adjustment expenses (allocated or unallocated) or investment expenses. The expenses include only amounts incurred directly by the company reporting entity, and do not include expenses incurred by any agents (regardless of ownership interest).

Exclude: Expenses on orders not produced by the company reporting entity (report this in Column 6, Other Operations).

Column 2 – Title and Escrow Operating Expenses - Non-affiliated Agency Operations

The amounts shown in this column represent expenses related to the company's reporting entities' title and escrow non-affiliated agency operations. It does not include losses, loss adjustment expenses (allocated or unallocated) or investment expenses. The expenses include only amounts incurred directly by the company reporting entity and do not include expenses incurred by any agency (regardless of ownership interest).

Exclude: Expenses on orders not produced by the company reporting entity (report this in Column 6, Other Operations).

Column 3 – Title and Escrow Operating Expenses - Affiliated Agency Operations

The amount shown in this column represent expenses related to the company's reporting entities' title and escrow affiliated agency operations. It does not include losses, loss adjustment expenses (allocated or unallocated) or investment expenses. The expenses include only amounts incurred directly by the company reporting entity and do not include expenses incurred by any agency (regardless of ownership interest).

Exclude: Expenses on orders not produced by the company reporting entity (report this in Column 6, Other Operations).

An agency operation is affiliated if the agency is an affiliate as defined by SSAP No. 25—*Affiliates and Other Related Parties*.

Column 4 – Total

The amounts reported in this column are the total of Columns 1, 2 and 3.

Column 5 – Unallocated Loss Adjustment Expenses

The amounts shown in this column represent the indirect costs incurred by the ~~company~~ reporting entity in settlement of title and other claims. As an example, the costs related to salaried employees of the insurer involved in the management of claims are included in this category. Do not include any costs incurred by the agents in settlement of title or other claims.

The amounts shown on Line 24 should agree with the amounts reported on the Operations and Investment Exhibit, Part 2A, Line 9.

Column 6 – Other Operations

The amounts shown in this column represent the expenses incurred by the ~~company~~ reporting entity in operations other than title and escrow, or loss adjustment or investment activities.

Include: Expenses on orders not produced by the ~~company~~ reporting entity, such as expenses incurred in the sale of title services to attorneys, agents, lenders or others. Expenses related to the revenue reported as Other Operating Income on Page 4, Line 2.

Exclude: Expenses allocated to providing services related to the issuance of a title policy by direct operations.

Column 7 – Investment Expenses

The amounts shown in this column represent the expenses incurred by the ~~company~~ reporting entity, both internal and external, in connection with the production of the ~~company~~ reporting entity investment income.

Column 8 – Current Year Total

The amounts reported in this column are the total of Columns 4, 5, 6 and 7.

Column 9 – Prior Year Total

The amounts reported in this column are the amounts reported in Column 8 for the prior year.

INSTRUCTIONS FOR UNIFORM CLASSIFICATIONS OF EXPENSES OF**TITLE INSURERS**

For the purposes of establishing uniformity in classifications of expenses of title insurers recorded in statements and reports filed with and statistics reported to Insurance Departments, all such reporting entities shall observe the instruction set forth below.

LIST OF OPERATING EXPENSE CLASSIFICATIONS FOR ANNUAL STATEMENT PURPOSES

1. Personnel Costs
 - 1.1 Salaries
 - 1.2 Employee Relations and Welfare
 - 1.3 Payroll Taxes
 - 1.4 Other Personnel Costs
2. Amounts Paid to or Retained by Title Agents
3. Production Services (purchased outside)
 - 3.1 Searches, Examinations and Abstracts
 - 3.2 Surveys
 - 3.3 Other
4. Advertising
5. Boards, Bureaus and Associations
6. Title Plant Rent and Maintenance
7. Claim Adjustment Services
8. Amounts Charged Off, Net of Recoveries
9. Marketing and Promotional Expenses
10. Insurance
11. Directors' Fees
12. Travel and Travel Items
13. Rent and Rent Items
14. Equipment
15. Cost or Depreciation of EDP Equipment and Software
16. ~~Printing, and Stationary, Books and Periodicals~~
17. ~~Postage, and Telephone, Messengers and Express~~
18. Legal and Auditing
20. Taxes, Licenses and Fees
 - 20.1 State and Local Insurance Taxes
 - 20.2 Insurance Department Licenses and Fees
 - 20.3 Gross Guaranty Association Assessments
 - 20.4 All Other (excluding Federal Income and Real Estate)
21. Real Estate Expenses
22. Real Estate Taxes
23. Miscellaneous

Line 1.1 – Salaries

Include: Salaries, bonus, overtime, contingent compensation, pay while on leave, dismissal allowances, pay while training and other compensation of officers and employees.

Commission and brokerage to employees when the activities for which the commission is paid are part of their duties as employees.

Exclude: Salaries or wages, etc., of janitors, caretakers, maintenance workers and agents paid in connection with owned real estate and premises leased for company use. (See Real Estate Expenses.)

Retirement allowances.

Directors' and committee fees.

Disability payments to or on behalf of employees under self-insurance plan.

Line 1.2 – Employee Relations and Welfare

Include: Cost of retirement insurance.

Payments or appropriations to funds irrevocably devoted to the payment of pensions or other employees' benefits.

Pensions or other retirement allowances.

Accident, health and hospitalization insurance for employees.

Group life insurance for employees.

Workers' compensation insurance.

Payments to or on behalf of employees under self-insurance.

Any other insurance for the benefit of employees.

Net periodic postretirement benefit cost.

Earned amounts related to employee stock option plans.

Payments by ~~company~~ reporting entity under a program for stock options, purchase and award plans (including change in quoted market value).

Refer to *SSAP No. 12—Employee Stock Ownership Plans* and *SSAP No. 104~~R~~*—*Share-Based Payments* for accounting guidance.

Exclude: Premiums for life insurance on employees when the ~~company~~ reporting entity is the beneficiary.

Payments or appropriations to pension funds not irrevocably devoted to the payment of pensions or other employees; benefits (such payments or appropriations shall not appear among expenses).

Items includable in Real Estate Expenses.

All other types of insurance premiums.

Line 1.3 – Payroll Taxes

Include: Employer FICA, FUTA, SUTA, and other federal state and local payroll taxes.

Exclude: Payroll taxes includable in Real Estate Expenses.

Line 1.4 – Other Personnel Costs

Include: Cost of the following:

Advertising related to recruiting.

Employment agency placement fees.

Training and welfare of employees.

Physical examinations of employees or applicants for employment.

Character or credit reports on employees or applicants for employment.

Gatherings, outings and entertainment for employees.

Visiting nurse service for or on behalf of employees.

Medical and hospital bills for employees (not included in Employee Relations and Welfare).

Direct payments other than salaries, to employees for injury and sickness (not included in Employee Relations and Welfare).

Overtime meals.

Donations to or on behalf of employees.

Food and catering for employees.

Exclude: Salaries, bonus, overtime, contingent compensation, pay while on leave, dismissal allowances, pay while training and other compensation of employees. (See Salaries.)

Items includable in Real Estate Expenses.

Cost of house organ (in-house periodical or employee periodical) and similar publications. (See Advertising, and Printing and Stationery.)

Line 2 – Amount Paid to or Retained by Title Agents

This line includes all amounts paid directly or indirectly to the title agent. It can include commissions or fees paid directly to the title agents. It can also include any amounts collected from the insureds for title insurance premiums that are retained by the title agent, and not remitted to the ~~company~~ reporting entity.

Line 3.1 – Searches, Examinations and Abstracts

Include: Searching and examining, reading, closing, abstracts and continuations and tax searches, including continuations and mark offs.

State searches such as franchise tax, transfers, and estates, incorporation's, dissolution's of corporations and any other searches required of the State Department of Taxation.

Building Department searches such as tenement house, cost of certificate of occupancy, Department of Building and Housing, etc.

Other miscellaneous searches such as bankruptcy lists, street reports; examining conditional bills of sale, and chattel mortgage; death certificates, fire health and labor departments, abstracts or certified copies of anything pertaining to record proof required in the examination of title, including surrogate's proceedings, probate proceedings, transfer tax proceedings, bankruptcy proceedings, Federal Court proceedings, copies of deeds, letters testamentary, wills, etc.; appointment of trustees, etc.; last owners; and any other analogous thereto.

Exclude: Survey charges, appraisals and salaries of staff members providing search examination and abstract services.

Line 3.2 – Surveys

This account classification shall include the net charges of outside surveyors or other title companies for all survey work including possession surveys; enclosure surveys; locations surveys; surveying and locating building and showing same on map; survey, map, and descriptions; staking plot; furnishing tracings and prints; redating surveys; survey prints purchased.

Exclude: Compensation of salary staff members for making survey or property inspections.

Blueprints and photostats of surveys.

Line 3.3 – Other

Include: Purchases of atlases whether in print or electronic format.

Cost of keeping atlases current such as the insertion of new pages and corrections, indexing and other related expenses.

Cost of copies of filed land maps, damage maps, extracts of sheets from land maps, alteration maps obtained from topographical bureaus.

Binding, printing, mounting, and indexing land maps.

Sales tax and discounts on items included.

Other outside production services purchased, such as property inspections, policy or report typing.

Line 4 – Advertising

Include:

Services of advertising agents.

Public relations counsel.

Space in newspapers, trade publications, diaries, directories, yearbooks, billboards, programs and other publications including electronic formats.

Circulars, pamphlets, calendars and literature issued for advertising or promotional purposes.

Drawings, plates, etchings, etc., in connection with advertising.

All charges for printing, paper, etc., in bills covering advertising.

Media broadcasts (e.g., radio, television, etc.)

Prospect and mailing lists.

Advertising in connections with corporate proceedings.

Printed material issued or distributed for promotional purposes.

All charges for compiling material content, printing, paper, mailing expenses, including envelopes, labels, and boxes, etc., in connection with the distribution of promotional material.

Souvenirs and other promotional items for general distribution.

House organs (in-house periodical or employee periodical) and similar publications distributed to persons other than staff members.

Signs, frames, medals, etc., for agents.

Advertising required by law when more than the minimum space required to comply with the law is taken.

Exclude:

Compensation to employees. (See Salary.)

Items includable in Travel and Travel Items.

Items includable in Boards and Associations.

Items includable in Claim Adjustment Services.

Advertising and business development expenses allowed, reimbursed or paid to managers, agents, brokers, solicitors, and other producers.

Cost of advertising related to recruiting. (See Employee Relations and Welfare.)

Cost of advertising in connection with owned real estate. (See Real Estate Expenses).

Donations to organized charities. (See Miscellaneous.)

Costs of charts, maps, etc., used for routine company operations.

Cost of literature and booklets, placards, signs, etc., issued solely for employee benefits.

Cost of house organs (in-house periodical or employee periodical) and similar publications for use of employees. (See Printing and Stationery.)

Cost of souvenirs not generally distributed. (See Travel and Travel Items.)

Line 5 – Boards, Bureaus and Associations

Include: Dues, assessments, fees and charges of underwriting boards, rating organizations, statistical agencies, inspection and audit bureaus.

Underwriters' advisory and service organizations.

Accident and loss prevention organizations.

Claim organizations.

Underwriting syndicates, pools and associations and assigned risk plans (except Commission and Brokerage, Claim Adjustment Services, and Taxes, Licenses and Fees).

Specific payments to title or mortgage associations for rate manuals, revisions, fillers and other industry-wide literature.

Exclude: Dues and subscriptions to social or civic clubs or affairs and to associations of customers. (See Marketing and Promotion.)

Dues and subscriptions to accounting, legal, actuarial or similar societies and associations. (See Legal and Auditing.)

Cost of inspection, engineering or accident and loss prevention billed specifically to individual companies.

Loss adjustment expenses billed specifically to individual companies. (See Claim Adjustment Services).

Allowances under reinsurance contracts for board and bureau expenses.

Payments to State Industrial Commissions. (See Taxes, Licenses and Fees.)

Payments into State Security Funds. (See Taxes, Licenses and Fees.)

Commission and Brokerage. Claim Adjustment Services, and Taxes, Licenses and Fees of underwriting syndicates, pools and associations.

Cost of survey, credit, moral hazard, character and commercial reports obtained for underwriting purposes.

Cost of commercial reporting services.

Line 6 – Title Plant Rent and Maintenance

The line includes all direct costs incurred in connection with the rental or lease of title plants. It also includes costs incurred by the ~~company~~ reporting entity in connection with the participation in joint maintenance agreements for title plants owned by others.

Line 7 – Claim Adjustment Services

Include: Other claim adjustment fees and expenses.

Outside services for unallocated claim administration.

Auditing fees and expenses of independent auditors for auditing payrolls and premium bases.

Exclude: Compensation to employees. (See Salaries.)

Expenses of salaried employees. (See Travel and Travel Items.)

Fees and expenses of lawyers for legal services in the defense, trial or appeal of suits, or for other allocated legal services rendered in connection with title claims (include in Title Losses and Loss Adjustment Expenses Paid).

Interests and costs assessed as part of or subsequent to judgment (include in Title Losses Paid).

Line 8 – Amounts Charged Off, Net of Recoveries

This line includes amounts charged off related to title insurance premiums, title agency remittances and other services accrued that could not be collected.

Include: Recoveries of amounts previously charged off.

Exclude: Items includable in Real Estate Expenses.

Line 9 – Marketing and Promotional Expenses

This line includes all amounts incurred for expenses directly related to the production of specific sales efforts.

Include: Dues and subscriptions to social or civic clubs or affairs and to associations of customers.

Exclude: Items included in Advertising, Line 4.

Compensation to employees. (See Salaries.)

Line 10 – Insurance

Include: Fidelity or surety bonds covering employees and agents.

Burglary and robbery insurance.

Public liability insurance premiums (excluding owned real estate).

Premiums for insurance on office contents.

Cost of insurance on automobiles.

All other insurance premiums not specifically provided for in other operating accounts.

Exclude: Items includable in Employee Relations and Welfare.

Items includable in Real Estate Expenses.

Items includable in Rent and Rent Items.

Items includable in Travel and Travel Items.

Line 11 – Directors' Fees

Include: Directors' fees and other compensation of directors for attendance at board or committee meetings.

Other fees, compensation and expenses paid to directors.

Exclude: Commissions to directors for the production of business.

Line 12 – Travel and Travel Items

Include: Transportation, hotel, meals, postage, shipping, delivery, telephone, ~~telegraph, express~~ and incidental living expenses of employees while traveling.

Expenses for transfer of employees.

Mileage allowance to employees for use of personal cars.

Depreciation repairs and other operating expenses of automobiles.

Rent of automobiles.

Fees for automobile registration.

Cost of insurance on rented automobiles.

Exclude: Items includable in Salaries; Advertising; Commissions; Taxes, Licenses and Fees; and Boards, Bureaus and Associations.

Cost of gatherings, outings, etc., and entertainment for employees. (See Other Personnel Costs.)

Items includable in Real Estate Expenses.

Donations to organized charities. (See Miscellaneous.)

Cost of souvenirs and other promotional items for general distribution. (See Advertising.)

Line 13 – Rent and Rent Items

- Include:
- Rent of home office and branch offices.
 - Real Estate taxes in connections with leased premises. Refer to *SSAP No. 22R—Leases* for accounting guidance of leases by lessors and lessees.
 - Rent for space occupied in buildings owned.
 - Public liability insurance premiums.
 - Light, heat, power and water charges in leased premises.
 - Interest, taxes, etc., paid in lieu of rent for leased premises.
 - Cost of alterations and repairs of leased premises.
 - Rent of storage, safekeeping and warehouse space.
 - Rent of safe deposit boxes.
 - Rent of post office boxes.
 - Time clock service charges.
 - Cost of cleaning, towels, ice, water, electric lamp replacements and other expenses incidental to office maintenance.
- Exclude:
- Compensations to employees. (See Salaries.)
 - Rent of furniture, equipment, and office machines. (See Equipment.)
 - Rent of Automobiles. (See Travel and Travel Items.)
 - Cost of insurance on rented automobiles. (See Travel and Travel Items.)
 - Amortization expense for leasehold improvements as lessee.
 - Rent allowed, reimbursed, or paid to managers, agents, brokers, solicitors and other producers.
 - Items includable in Real Estate Expenses.
 - Rent income from owned real estate.

Line 14 – Equipment

- Include:
- Rent and repairs of furniture, equipment and office machines including printers' equipment and postage machines.
 - Equipment other than automobiles, purchased and fully depreciated or written off during the year.
 - Depreciation on furniture, equipment and office machines.

Exclude: Compensation to employees. (See Salaries.)

Rent, repair, and depreciation of automobiles. (See Travel and Travel Items.)

Cost of alterations and repairs of leased premises. (See Rent and Rent Items.)

Equipment expenses allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers.

Items includable in Real Estate Expenses.

Depreciation and amortization expense for electronic data processing equipment, operating and non-operating systems software. (See Cost or Depreciation of EDP Equipment and Software.)

Line 15 – Cost or Depreciation of EDP Equipment and Software

Include: Depreciation and amortization expense for electronic data processing equipment, operating and non-operating systems software.

Cost of computer software

Refer to *SSAP No. 16R—Electronic Data Processing Equipment and Software* for accounting guidance.

Line 16 – ~~Printing, and Stationery, Books and Periodicals~~

Include: Printing, stationery and office supplies such as: letterheads, envelopes, paper stock, printed forms or manuals, adding machine tape, ~~carbon paper~~, binders and posts, ~~photostatic~~ copies, pencils, pens, ink, glue, stamps and stamp pads, staplers, staples, clips and pins, desk top equipment (calendars, trays, etc.), waste baskets, analysis pads, ledgers, journals, minute books, etc.

Policies and policy forms.

House organs (in-house periodical or employee periodical) and similar publications for the use of employees.

Books, newspapers and periodicals including investment, tax and legal publications and services, whether in print or electronic format.

Exclude: Compensation to employees. (See Salaries.)

Specific payments to boards, bureaus and associations for rate manuals, revisions, fillers, rating plans and experience data. (See Boards, Bureaus and Associations.)

Literature, booklets, placards, signs, etc., issued solely for accident and loss prevention. (See Surveys and Underwriting Reports.)

Items includable in Claim Adjustment Services.

Items includable in Advertising.

Printers' equipment in company owned printing department. (See Equipment.)

Printing and stationery costs allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers.

House organs (in-house periodical or employee periodical) and similar publications distributed to persons other than employees. (See Advertising.)

Commercial reporting services.

Items includable in Real Estate Expenses.

Line 17 – ~~Postage and, Telephone, Messengers and Express~~

Include: ~~Express, Freight and cartage-~~

~~Postage-~~

~~Cost of telephone-~~

~~Bank charges for collection and exchange-~~

Exclude: Compensation to employees. (See Salaries.)

Rent, repairs, and depreciation of postage machine. (See Equipment.)

~~Postage and, telephone, telegraph and express mail service~~ used by employees while traveling. (See Travel and Travel Items.)

~~Postage, shipping, delivery, and, telephone, telegraph, exchange and express mail service~~ allowed, reimbursed or paid to managers, agents, brokers, solicitors and other producers.

Profits or losses resulting from exchange on remittances to home office by a U.S. branch. Such profits or losses shall not be included in expenses.

Items includable in Real Estate Expenses.

Rent of post office boxes. (See Rent and Rent Items.)

Line 18 – Legal and Auditing

Include: Legal retainers, fees and other legal expenses and non-title related losses (except on title and escrow losses and salvage).

Auditing fees of independent auditors for examining records of home and branch offices.

Cost of services of tax advisors.

Services of consultants.

Fees of investment counsel.

Fees and expenses of other persons than employees, for collecting balances.

Notary fees.

Dues and subscriptions to accounting, legal, actuarial or similar societies and associations.

Exclude: Compensation to employees. (See Salaries.)

Expenses of salaried employees. (See Travel and Travel Items.)

Items includable in title or escrow losses and salvage.

Items includable in Real Estate Expenses.

Line 20.1 – State and Local Insurance Taxes

Include: State premium taxes, licenses and fees.

County and municipal premium taxes, licenses and fees.

Fire Patrol assessments.

Payments to State Industrial (or other) Commissions for administration of Workers' Compensation or other State Benefit Acts (including assessments for administering Financial Responsibility Laws) regardless of basis of assessment.

Net payments to State Security Funds, Reopened Case Funds, Social Injury Funds and other State Funds, when construed by the ~~company~~ reporting entity as operating expenses, regardless of basis of assessment.

Exclude: Allowances for taxes under reinsurance contracts.

Line 20.2 – Insurance Department Licenses and Fees

Include: Agents' licenses.

Certificates of authority, compliance, deposit, etc.

Filing fees.

Fees and expenses of examination by insurance department or other governmental agencies.

Business licenses, corporation licenses.

Exclude: Items includable in Line 20.1 - State and Local Insurance Taxes and Line 20.4 - All Other (Excluding Federal Income and Real Estate).

Items includable in Claim Adjustment Services.

Line 20.4 – All Other (Excluding Federal Income and Real Estate)

Include: Qualifying bond premiums.

Statement publication fees.

Advertising required by law.

Personal property taxes.

State taxes on income or gross receipts.

Occupancy tax.

Capital stock taxes.

Business corporation licenses or fees (not includable Lines 20.1 or 20.2).

Marine profits taxes.

Documentary stamps on reinsurance.

Any other taxes not assignable under Lines 20.1, 20.2 and 20.3 and not otherwise excluded.

Exclude: Real estate taxes (See Real Estate Taxes).

Cost of advertising required by law where more than minimum space required to comply with the law is taken. Such expenses shall be included in Advertising.

Items includible in Claim Adjustment Services.

Fees for automobile license plates (See Travel and Travel Items).

Federal income taxes.

County and municipal premium taxes, licenses and fees.

Sales taxes, etc., included on invoice of vendors. Such taxes are to follow allocation of cost of items purchased.

Line 21 – Real Estate Expenses

Include: Salaries, wages and other compensation, including payroll taxes, of janitors, caretakers, maintenance workers and agents paid in connection with owned real estate.

Cost of operating and maintaining owned real estate.

Cost of insurance in connection with owned real estate.

Cost of advertising in connection with owned real estate.

Line 22 – Real Estate Taxes

Include: Taxes, licenses and fees on owed real estate.

Line 23 – Aggregate Write-ins for Other Expenses

Enter the total of the write-ins listed in schedule Details of Write-ins Aggregated at Line 23 for Other Expenses.

Details of Write-ins Aggregated at Line 23 for Other Expenses

List separately each category of other expense for which there is no pre-printed line in Part 3.

Expenses not listed as includable in other operating expense classifications, and not analogous thereto, shall be included in "Other." Specifically, the following shall be included:

- Include:
- Donations to organized charities.
 - Cost of tabulating service when such service is rendered by outside organizations.
 - Amounts received and handled in accordance with the Instruction "Income from Special Services."
 - Differences between actual amounts paid, and amounts apportioned in accordance with the Instruction "Joint Expenses."

GENERAL INSTRUCTIONS IN CONNECTION WITH OPERATING EXPENSE CLASSIFICATIONS

A. Joint Expense

Whenever personnel or facilities are used in common by two or more companies, or whenever the personnel or facilities of one company are used in the activities of two or more companies, the expenses involved shall be apportioned in accordance with the instructions relating to Joint Expenses, and such apportioned expenses shall be allocated by each company to the same operating expense classifications as if the expenses had been borne wholly. Any difference between the actual amount paid, and the amount of such apportioned expenses, shall be included in the operating expense classification "Miscellaneous."

This instruction does not apply to the following, which are covered by separate instructions herein:

Reinsurance commission and allowance (see Commission and Brokerage – Reinsured Assumed and Ceded)

Commission and brokerage paid to managers and agents (see Commission and Brokerage – Direct)

Allowances to managers and agents (see Allowances to Manager and Agents)

Expenses allocable in accordance with the instruction "Income from Special Services"

B. Expenses for Account of Another

Whenever expenses are paid by one company for account of another, the payments shall not appear among the expenses reported by the former, and shall be included by the latter in the same expense classification as if originally paid by it.

C. Income from Special Services

Whenever an insurance company receives compensation for sales or services, such as loss adjustment or inspection not related to policies written by the company, and such compensation is not calculated as a joint expense reimbursement, the amount thereof shall be included in the operating expense classification "Miscellaneous." Where an insurance company pays the compensation, allocation shall be made to the expense classification dictated by the nature of the expense.

Reinsurance commission and allowances (See Commission and Brokerage – Reinsurance Assumed and Ceded).

Expenses incurred for the benefit of companies in the same group or fleet are covered by the instruction "Joint Expenses."

D. Analogous Items

The list of expenses includible in the operating expense classifications is representative and do not exclude analogous items that are omitted from the lists.

OPERATIONS AND INVESTMENT EXHIBIT**PART 4 – NET OPERATING GAIN/LOSS EXHIBIT**

| | | |
|----------|---|--|
| Column 1 | – | Direct Operations |
| | | The amounts shown in this column represent the company <u>reporting entity</u> direct operations. No items from agency operations (even wholly-owned agencies) are to be included in this column; only home office and branch office operations are to be included in this column. |
| Column 2 | – | Non-affiliated Agency Operations |
| | | The amounts shown in this column represent the company <u>reporting entity</u> non-affiliated agency operations. This column should include all agency operations other than those that are reported in Column 3. |
| Column 3 | – | Affiliated Agency Operations |
| | | The amounts shown in this column represent the company <u>reporting entity</u> affiliated agency operations. Wholly-owned agencies should be included in the amounts shown in this column. The standards for reporting as an affiliated agency are the affiliation standards established under the holding company laws of the domestic state jurisdiction. |
| Column 4 | – | Total |
| | | The amounts reported in this column are the total of Columns 1, 2 and 3. |
| Column 5 | – | Other Operations |
| | | The amounts in this column represent amounts other than those shown in Columns 1, 2 or 3. |
| Column 6 | – | Current Year Total |
| | | The amounts reported in this column are the total of Columns 4 and 5. |
| Column 7 | – | Prior Year Total |
| | | The amounts reported in this column are the amounts reported in Column 6 for the prior year. |
| Line 1.1 | – | Title Insurance Premiums Earned |
| | | The amounts reported in this line are the amounts reported in Operations and Investment Exhibit, Part 1B, Line 3, Column 1. |
| Line 1.2 | – | Escrow and Settlement Services |
| | | The amounts reported in this line are the amounts reported in Operations and Investment Exhibit, Part 1A, Line 2. |
| Line 1.3 | – | Other Title Fees and Service Charges |
| | | The amounts reported in this line are the amounts reported in Operations and Investment Exhibit, Part 1A, Lines 3 to 6. |

- Line 3 – Total Operating Income
- The amounts reported on this line are the totals of the amounts shown on Lines 1.1 through 1.3 plus the amount shown on Line 2.
- Line 4 – Losses and Loss Adjustment Expenses Incurred
- The amounts reported in this line are the amounts reported in Operations and Investment Exhibit, Part 2A, Line 10, Column 4.
- Line 5 – Operating Expenses Incurred
- The amounts reported in this line are the amounts reported in Operations and Investment Exhibit, Part 3, Line 24, Columns 1 through 3 and Column 6.
- Line 6 – Total Operating Deductions
- The amounts reported in this line are the amounts reported on Line 4 plus Line 5.
- Line 7 – Net Operating Gain or (Loss)
- The amounts reported in this line are the amounts reported on Line 3 less the amounts reported on Line 6.

ANNUAL STATEMENT BLANK – PROPERTY

UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 – EXPENSES

| | 1 Loss Adjustment Expenses | 2 Other Underwriting Expenses | 3 Investment Expenses | 4 Total |
|---|----------------------------------|-------------------------------------|--------------------------|------------|
| 1. Claim adjustment services: | | | | |
| 1.1 Direct..... | | | | |
| 1.2 Reinsurance assumed..... | | | | |
| 1.3 Reinsurance ceded..... | | | | |
| 1.4 Net claim adjustment services (1.1+1.2-1.3)..... | | | | |
| 2. Commission and brokerage: | | | | |
| 2.1 Direct, excluding contingent..... | | | | |
| 2.2 Reinsurance assumed, excluding contingent..... | | | | |
| 2.3 Reinsurance ceded, excluding contingent..... | | | | |
| 2.4 Contingent—direct..... | | | | |
| 2.5 Contingent—reinsurance assumed..... | | | | |
| 2.6 Contingent—reinsurance ceded..... | | | | |
| 2.7 Policy and membership fees..... | | | | |
| 2.8 Net commission and brokerage (2.1+2.2-2.3+2.4+2.5- 2.6+2.7)..... | | | | |
| 3. Allowances to manager and agents..... | | | | |
| 4. Advertising..... | | | | |
| 5. Boards, bureaus and associations..... | | | | |
| 6. Surveys and underwriting reports..... | | | | |
| 7. Audit of assureds' records..... | | | | |
| 8. Salary and related items: | | | | |
| 8.1 Salaries..... | | | | |
| 8.2 Payroll taxes..... | | | | |
| 9. Employee relations and welfare..... | | | | |
| 10. Insurance..... | | | | |
| 11. Directors' fees..... | | | | |
| 12. Travel and travel items..... | | | | |
| 13. Rent and rent items..... | | | | |
| 14. Equipment..... | | | | |
| 15. Cost or depreciation of EDP equipment and software..... | | | | |
| 16. Printing and stationery..... | | | | |
| 17. Postage, and telephone and telegraph, exchange and express..... | | | | |
| 18. Legal and auditing..... | | | | |
| 19. Totals (Lines 3 to 18)..... | | | | |
| 20. Taxes, licenses and fees: | | | | |
| 20.1 State and local insurance taxes deducting guaranty association credits of \$..... | | | | |
| 20.2 Insurance department licenses and fees..... | | | | |
| 20.3 Gross guaranty association assessments..... | | | | |
| 20.4 All other (excluding federal and foreign income and real estate)..... | | | | |
| 20.5 Total taxes, licenses and fees (20.1+20.2+20.3+20.4)..... | | | | |
| 21. Real estate expenses..... | | | | |
| 22. Real estate taxes..... | | | | |
| 23. Reimbursements by uninsured plans..... | | | | |
| 24. Aggregate write-ins for miscellaneous expenses..... | | | | |
| 25. Total expenses incurred..... | | | | (a)..... |
| 26. Less unpaid expenses—current year..... | | | | |
| 27. Add unpaid expenses—prior year..... | | | | |
| 28. Amounts receivable relating to uninsured plans, prior year..... | | | | |
| 29. Amounts receivable relating to uninsured plans, current year..... | | | | |
| 30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29) | | | | |
| DETAILS OF WRITE-INS | | | | |
| 2401. | | | | |
| 2402. | | | | |
| 2403. | | | | |
| 2498. Summary of remaining write-ins for Line 24 from overflow page..... | | | | |
| 2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above) | | | | |

(a) Includes management fees of \$..... to affiliates and \$..... to non-affiliates.

PART I – ALLOCATION TO EXPENSE GROUPS
 (\$000 OMITTED)

| Operating Expense Classifications | 1 Loss Adjustment Expense | Other Underwriting Expenses | | | 5 Investment Expenses | 6 Total Expenses |
|--|------------------------------|---|-----------------------|-------------------------------|--------------------------|---------------------|
| | | 2 Acquisition, Field Supervision and Collection Expenses | 3 General Expenses | 4 Taxes, Licenses and Fees | | |
| 1. Claim adjustment services: | | | | | | |
| 1.1 Direct | | | | | | |
| 1.2 Reinsurance assumed | | | | | | |
| 1.3 Reinsurance ceded | | | | | | |
| 1.4 Net claim adjustment services (Lines 1.1+1.2-1.3) .. | | | | | | |
| 2. Commission and brokerage: | | | | | | |
| 2.1 Direct excluding contingent | | | | | | |
| 2.2 Reinsurance assumed excluding contingent | | | | | | |
| 2.3 Reinsurance ceded excluding contingent | | | | | | |
| 2.4 Contingent—direct | | | | | | |
| 2.5 Contingent—reinsurance assumed | | | | | | |
| 2.6 Contingent—reinsurance ceded | | | | | | |
| 2.7 Policy and membership fees | | | | | | |
| 2.8 Net commission and brokerage (Lines 2.1+2.2-2.3+2.4+2.5-2.6+2.7) | | | | | | |
| 3. Allowances to managers and agents | | | | | | |
| 4. Advertising | | | | | | |
| 5. Boards, bureaus and associations | | | | | | |
| 6. Surveys and underwriting reports | | | | | | |
| 7. Audit of assureds' records | | | | | | |
| 8. Salary related items: | | | | | | |
| 8.1 Salaries | | | | | | |
| 8.2 Payroll taxes | | | | | | |
| 9. Employee relations and welfare | | | | | | |
| 10. Insurance | | | | | | |
| 11. Directors' fees | | | | | | |
| 12. Travel and travel items | | | | | | |
| 13. Rent and rent items | | | | | | |
| 14. Equipment | | | | | | |
| 15. Cost or depreciation of EDP equipment and software | | | | | | |
| 16. Printing and stationery | | | | | | |
| 17. Postage, and telephone and telegraph, exchange and express | | | | | | |
| 18. Legal and auditing | | | | | | |
| 19. Totals (Lines 3 to 18) | | | | | | |
| 20. Taxes, licenses and fees: | | | | | | |
| 20.1 | | | | | | |
| State and local insurance taxes deducting guaranty association credits of \$ | | | | | | |
| 20.2 Insurance department licenses and fees | | | | | | |
| 20.3 Gross guaranty association assessments | | | | | | |
| 20.4 All other (excl. Fed. and foreign income and real | | | | | | |
| estate) | | | | | | |
| 20.5 Total taxes, licenses and fees (Lines 20.1+20.2+20.3+20.4) | | | | | | |
| 21. Real estate expenses | | | | | | |
| 22. Real estate taxes | | | | | | |
| 23. Reimbursements by uninsured plans | XXX | XXX | XXX | XXX | XXX | XXX |
| 24. Aggregate write-ins for miscellaneous operating expenses | | | | | | |
| 25. TOTAL EXPENSES INCURRED | | | | | | |
| DETAILS OF WRITE-INS | | | | | | |
| 2401. | | | | | | |
| 2402. | | | | | | |
| 2403. | | | | | | |
| 2498. Summary of remaining write-ins for Line 24 from overflow page | | | | | | |
| 2499. TOTAL (Lines 2401 through 2403 plus 2498) (Line 24 above) | | | | | | |

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL

EXHIBIT 2 – GENERAL EXPENSES

| | Insurance | | | | 5 | 6 | 7 |
|---|---------------------------|-------------------------------------|-----------------------------|------------|-----------|----------|----------|
| | 1 | Accident and Health | | 4 | | | |
| | | 2 | 3 | | | | |
| Life | Cost Containment | All Other | All Other Lines of Business | Investment | Fraternal | Total | |
| 1. Rent | | | | | | | |
| 2. Salaries and wages | | | | | | | |
| 3.11 Contributions for benefit plans for employees | | | | | | | |
| 3.12 Contributions for benefit plans for agents | | | | | | | |
| 3.21 Payments to employees under non-funded benefit plans | | | | | | | |
| 3.22 Payments to agents under non-funded benefit plans | | | | | | | |
| 3.31 Other employee welfare | | | | | | | |
| 3.32 Other agent welfare | | | | | | | |
| 4.1 Legal fees and expenses | | | | | | | |
| 4.2 Medical examination fees | | | | | | | |
| 4.3 Inspection report fees | | | | | | | |
| 4.4 Fees of public accountants and consulting actuaries | | | | | | | |
| 4.5 Expense of investigation and settlement of policy claims | | | | | | | |
| 5.1 Traveling expenses | | | | | | | |
| 5.2 Advertising | | | | | | | |
| 5.3 Postage, express, telegraph and telephone | | | | | | | |
| 5.4 Printing and stationery | | | | | | | |
| 5.5 Cost or depreciation of furniture and equipment | | | | | | | |
| 5.6 Rental of equipment | | | | | | | |
| 5.7 Cost or depreciation of EDP equipment and software | | | | | | | |
| 6.1 Books and periodicals | | | | | | | |
| 6.2 Bureau and association fees | | | | | | | |
| 6.3 Insurance, except on real estate | | | | | | | |
| 6.4 Miscellaneous losses | | | | | | | |
| 6.5 Collection and bank service charges | | | | | | | |
| 6.6 Sundry general expenses | | | | | | | |
| 6.7 Group service and administration fees | | | | | | | |
| 6.8 Reimbursements by uninsured plans | | | | | | | |
| 7.1 Agency expense allowance | | | | | | | |
| 7.2 Agents' balances charged off (less \$..... recovered) | | | | | | | |
| 7.3 Agency conferences other than local meetings | | | | | | | |
| 8.1 Official publication (Fraternal Benefit Societies Only) | XXX | XXX | XXX | XXX | XXX | | |
| 8.2 Expense of supreme lodge meetings(Fraternal Benefit Societies Only) | XXX | XXX | XXX | XXX | XXX | | |
| 9.1 Real estate expenses | | | | | | | |
| 9.2 Investment expenses not included elsewhere | | | | | | | |
| 9.3 Aggregate write-ins for expenses | | | | | | | |
| 10. General expenses incurred | | | | | | | |
| 11. General expenses unpaid December 31, prior year | | | | | | (b)..... | (a)..... |
| 12. General expenses unpaid December 31, current year | | | | | | | |
| 13. Amounts receivable relating to uninsured plans, prior year | | | | | | | |
| 14. Amounts receivable relating to uninsured plans, current year | | | | | | | |
| 15. General expenses paid during year (Lines 10 + 11 - 12 - 13 + 14) | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | |
| 09.301. | | | | | | | |
| 09.302. | | | | | | | |
| 09.303. | | | | | | | |
| 09.398. Summary of remaining write-ins for Line 9.3 from overflow page | | | | | | | |
| 09.399. Totals (Lines 09.301 through 09.303 + 09.398) (Line 9.3 above) | | | | | | | |
| (a) Includes management fees of \$..... to affiliates and \$..... to non-affiliates. | | | | | | | |
| (b) Show the distribution of this amount in the following categories (Fraternal Benefit Societies Only) | | | | | | | |
| 1. Charitable \$ | 2. Institutional \$ | 3. Recreational and Health \$ | 4. Educational \$ | | | | |
| 5. Religious \$ | 6. Membership \$ | 7. Other \$ | 8. Total \$ | | | | |

ANNUAL STATEMENT BLANK – HEALTH

**UNDERWRITING AND INVESTMENT EXHIBIT
PART 3 – ANALYSIS OF EXPENSES**

| | Claim Adjustment Expenses | | 3 General Administrative Expenses | 4 Investment Expenses | 5 Total |
|--|--------------------------------------|--|--|-----------------------------|------------|
| | 1 Cost Containment Expenses | 2 Other Claim Adjustment Expenses | | | |
| 1. Rent (\$..... for occupancy of own building)..... | | | | | |
| 2. Salaries, wages and other benefits..... | | | | | |
| 3. Commissions (less \$ ceded plus \$ assumed)..... | | | | | |
| 4. Legal fees and expenses..... | | | | | |
| 5. Certifications and accreditation fees..... | | | | | |
| 6. Auditing, actuarial and other consulting services..... | | | | | |
| 7. Traveling expenses..... | | | | | |
| 8. Marketing and advertising..... | | | | | |
| 9. Postage, express and telephone..... | | | | | |
| 10. Printing and office supplies..... | | | | | |
| 11. Occupancy, depreciation and amortization..... | | | | | |
| 12. Equipment..... | | | | | |
| 13. Cost or depreciation of EDP equipment and software..... | | | | | |
| 14. Outsourced services including EDP, claims, and other services..... | | | | | |
| 15. Boards, bureaus and association fees..... | | | | | |
| 16. Insurance, except on real estate..... | | | | | |
| 17. Collection and bank service charges..... | | | | | |
| 18. Group service and administration fees..... | | | | | |
| 19. Reimbursements by uninsured plans..... | | | | | |
| 20. Reimbursements from fiscal intermediaries..... | | | | | |
| 21. Real estate expenses..... | | | | | |
| 22. Real estate taxes..... | | | | | |
| 23. Taxes, licenses and fees: | | | | | |
| 23.1 State and local insurance taxes..... | | | | | |
| 23.2 State premium taxes..... | | | | | |
| 23.3 Regulatory authority licenses and fees..... | | | | | |
| 23.4 Payroll taxes..... | | | | | |
| 23.5 Other (excluding federal income and real estate taxes)..... | | | | | |
| 24. Investment expenses not included elsewhere..... | | | | | |
| 25. Aggregate write-ins for expenses..... | | | | | |
| 26. Total expenses incurred (Lines 1 to 25)..... | | | | | |
| 27. Less expenses unpaid December 31, current year..... | | | | | |
| 28. Add expenses unpaid December 31, prior year..... | | | | | |
| 29. Amounts receivable relating to uninsured plans, prior year..... | | | | | |
| 30. Amounts receivable relating to uninsured plans, current year..... | | | | | |
| 31. Total expenses paid (Lines 26 minus 27 plus 28 minus 29 plus 30) | | | | | |
| DETAILS OF WRITE-INS | | | | | |
| 2501. | | | | | |
| 2502. | | | | | |
| 2503. | | | | | |
| 2598. Summary of remaining write-ins for Line 25 from overflow page..... | | | | | |
| 2599. Totals (Line 2501 through 2503 + 2598) (Line 25 above) | | | | | |

(a) Includes management fees of \$..... to affiliates and \$..... to non-affiliates.

ANNUAL STATEMENT BLANK – TITLE

**OPERATIONS AND INVESTMENT EXHIBIT
PART 3 – EXPENSES**

| | Title and Escrow Operating Expenses | | | | 5 Unallocated Loss Adjustment Expenses | 6 Other Operations | 7 Investment Expenses | Totals | |
|--|-------------------------------------|---|---|-----------------------------|--|--------------------------|-----------------------------|--------------------------------------|--------------------|
| | 1 Direct Operations | Agency Operations | | 4 Total (Cols. 1+2+3) | | | | 8 Current Year (Cols. 4+5+6+7) | 9 Prior Year |
| | | 2 Non-affiliated Agency Operations | 3 Affiliated Agency Operations | | | | | | |
| 1. Personnel costs: | | | | | | | | | |
| 1.1 Salaries | | | | | | | | | |
| 1.2 Employee relations and welfare | | | | | | | | | |
| 1.3 Payroll taxes | | | | | | | | | |
| 1.4 Other personnel costs | | | | | | | | | |
| 1.5 Total personnel costs | | | | | | | | | |
| 2. Amounts paid to or retained by title agents | | | | | | | | | |
| 3. Production services (purchased outside): | | | | | | | | | |
| 3.1 Searches, examinations and abstracts..... | | | | | | | | | |
| 3.2 Surveys | | | | | | | | | |
| 3.3 Other | | | | | | | | | |
| 4. Advertising | | | | | | | | | |
| 5. Boards, bureaus and associations..... | | | | | | | | | |
| 6. Title plant rent and maintenance | | | | | | | | | |
| 7. Claim adjustment services | XXX | XXX | XXX | XXX | | XXX | XXX | | |
| 8. Amounts charged off, net of recoveries | | | | | | | | | |
| 9. Marketing and promotional expenses..... | | | | | | | | | |
| 10. Insurance..... | | | | | | | | | |
| 11. Directors' fees | | | | | | | | | |
| 12. Travel and travel items | | | | | | | | | |
| 13. Rent and rent items | | | | | | | | | |
| 14. Equipment..... | | | | | | | | | |
| 15. Cost or depreciation of EDP equipment and software..... | | | | | | | | | |
| 16. Printing, stationery, books and periodicals | | | | | | | | | |
| 17. Postage, and telephone, messengers and express..... | | | | | | | | | |
| 18. Legal and auditing | | | | | | | | | |
| 19. Totals (Lines 1.5 to 18)..... | | | | | | | | | |
| 20. Taxes, licenses and fees: | | | | | | | | | |
| 20.1 State and local insurance taxes | | | | | | | | | |
| 20.2 Insurance department licenses and fees | | | | | | | | | |
| 20.3 Gross guaranty association assessments..... | | | | | | | | | |
| 20.4 All other (excluding federal income and real estate) | | | | | | | | | |
| 20.5 Total taxes, licenses and fees (Lines 20.1 + 20.2 + 20.3 + 20.4)..... | | | | | | | | | |
| 21. Real estate expenses..... | | | | | | | | | |
| 22. Real estate taxes | | | | | | | | | |
| 23. Aggregate write-ins for other expenses | | | | | | | | | |
| 24. Total expenses incurred (Lines 19+20.5+21+22+23) | | | | | | | | (a) | |
| 25. Less unpaid expenses - current year..... | | | | | | | | | |
| 26. Add unpaid expenses - prior year | | | | | | | | | |
| 27. TOTAL EXPENSES PAID (Lines 24 - 25 + 26) | | | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | | | |
| 2301. | | | | | | | | | |
| 2302. | | | | | | | | | |
| 2303. | | | | | | | | | |
| 2398. Summary of remaining write-ins for Line 23 from overflow page..... | | | | | | | | | |
| 2399. Totals (Lines 2301 through 2303 plus 2398) (Line 23 above) | | | | | | | | | |

(a) Includes management fees of \$..... to affiliates and \$..... to non-affiliates.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|---|---|
| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Philip Barlow</u></p> <p>TITLE: <u>Associate Commissioner of Insurance</u></p> <p>AFFILIATION: <u>District of Columbia</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-27BWG MOD</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting [X]</p> <p>New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X]</p> <p>Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment</p> <p>[] Referred To Another NAIC Group</p> <p>[X] Received For Public Comment</p> <p>[] Adopted Date _____</p> <p>[] Rejected Date _____</p> <p>[] Deferred Date _____</p> <p>[] Other (Specify) _____</p> |
|---|---|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input checked="" type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Add a section to Life/Fraternal Asset Valuation Reserve (AVR) to report Collateralized Loan Obligations (CLOs), Collateralized Bond Obligations (CBOs), and Collateralized Debt Obligations (CDOs). Also, add a footnote to Schedule D, Part 1, Section 2 to report the book adjusted carrying value by NAIC designation for CLOs/CBOs/CDOs.
 In addition, AVR Equity table is augmented to facilitate changes made to the Life RBC Blank LR009 page.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was prepared to incorporate a more granular reporting of long-term bonds in Asset Valuation Reserve (AVR) – Default Component by bifurcating long-term bonds into i) Long-Term Bonds, excluding ~~collateralized loan obligations (CLOs)~~CLOs/CBOs/CDOs and ii) CLOs/CBOs/CDOs. The expanded presentation of bonds helps to facilitate the work of Risk-Based Capital Investment Risk and Evaluation (E) Working Group under Working Agenda IR#5: Evaluate the appropriate RBC treatment of Asset-Backed Securities (ABS), including Collateralized Loan Obligations (CLO), collateralized fund obligations (CFOs), or other similar securities carrying similar types of tail risk (Complex Assets).

In addition, the AVR – Default Component & Equity and Other Invested Asset Component tables are re-designed to section-by-section format in order to support future changes in asset categorization.

Finally, the proposed change to Schedule D, Part 1, Section 2 facilities P/C and Health RBC formulas should they consider expanding bond pages (PR006 and XR007) to bifurcate long-term bond into CLOs/CBOs/CDOs and other than CLOs/CBOs/CDOs.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____
 Other Comments: _____

** This section must be completed on all forms.

Revised 11/17/2022

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**ASSET VALUATION RESERVE****Detail Eliminated To Conserve Space**

Line 7 – Basic Contribution (includes separate accounts assets, if applicable)

Report the basic contribution amount for each asset category as calculated on Pages 30 through ~~36~~38 (General Account) and Pages 15 through ~~21-23~~ (Separate Accounts).

Column 1: Report the total bonds (including collateralized loan obligations), preferred stock, short-term investments, and derivative instruments from Pages ~~31 and 32~~, Lines ~~34A16, B8, C8, and D9~~, Column 6 (General Account) and Pages ~~16 and 17~~, Lines ~~34A16, B8, C8, and D9~~, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0199999, Column 7 (General Account) and Page ~~2123~~, Line 0199999, Column 7 (Separate Accounts).

Column 2: Report the total mortgage loans from Page ~~3233~~, Line ~~58E24~~, Column 6 (General Account) and Page ~~1718~~, Line ~~58E24~~, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0299999, Column 7 (General Account) and Page ~~2123~~, Line 0299999, Column 7 (Separate Accounts).

Column 4: Report the total common stock from Page ~~3334~~, Line ~~A17~~, Column 6 (General Account) and Page ~~1819~~, Line ~~18A17~~, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0399999, Column 7 (General Account) and Page ~~2123~~, Line 0399999, Column 7 (Separate Accounts).

Column 5: Report the total real estate from Page ~~3334~~, Line ~~21B4~~, Column 6 (General Account) and from Page ~~1819~~, Line ~~21B4~~, Column 6 (Separate Accounts), if applicable, plus the total other invested assets from Page ~~3537~~, Line ~~105L6~~, Column 6 (General Account) and from Page ~~2022~~, Line ~~105L6~~, Column 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0499999, Column 7 (General Account) and Page ~~2123~~, Line 0499999, Column 7 (Separate Accounts).

Line 9 – Maximum Reserve (includes separate accounts assets, if applicable)

Report the maximum reserve for each asset category as calculated on Pages 30 through ~~36-38~~ (General Account) and Pages 15 through ~~21-23~~ (Separate Accounts).

Column 1: Report the total bonds (including collateralized loan obligations), preferred stock, short-term investments, and derivative instruments from Pages ~~31 and 32~~, Lines ~~34A16, B8, C8, and D9~~, Column 10 (General Account) and Pages ~~16 and 17~~, Lines ~~34A16, B8, C8, and D9~~, Col. 10 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0199999, Column 9 (General Account) and Page ~~2123~~, Line 0199999, Column 9 (Separate Accounts).

Column 2: Report the total mortgage loans from Page ~~3233~~, Line ~~58E24~~, Column 10 (General Account) and Page ~~1718~~, Line ~~58E24~~, Col. 10 (Separate Accounts), if applicable and the

total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0299999, Column 9 (General Account) and Page ~~2423~~, Line 0299999, Column 9 (Separate Accounts).

Column 4: Report the total common stock from Page ~~3334~~, Line ~~17B4A17~~, Column 10 (General Account) and Page ~~1819~~, Line ~~17B4~~, Col. 10 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0399999, Column 9 (General Account) and Page ~~2423~~, Line 0399999, Column 9 (Separate Accounts).

Column 5: Report the total real estate from Page ~~3334~~, Line ~~21B4~~, Column 10 (General Account) and from Page ~~1819~~, Line ~~21B4~~, Column 10 (Separate Accounts), if applicable, plus the total other invested assets from Page ~~3537~~, Line ~~105L6~~, Column 10 (General Account) and from Page ~~2022~~, Line ~~105L6~~, Column 10 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0499999, Column 9 (General Account) and Page ~~2423~~, Line 0499999, Column 9 (Separate Accounts).

Line 10 – Reserve Objective (includes separate accounts assets, if applicable)

Report the reserve objective amount for each asset category as calculated on Pages 30 through ~~3638~~ (General Account) and Pages 15 through ~~2423~~ (Separate Accounts).

Column 1: Report the total bonds (~~including collateralized loan obligations~~ CLOs/CBOs/CDOs), preferred stock, short-term investments, and derivative instruments from Pages 31 and 32, Lines ~~34A16, B8, C8, and D9~~, Column 8 (General Account) and Pages 16 and 17, Lines ~~34A16, B8, C8, and D9~~, Column 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0199999, Column 8 (General Account) and Page ~~2423~~, Line 0199999, Column 8 (Separate Accounts).

Column 2: Report the total mortgage loans from Page ~~3233~~, Line ~~58E24~~, Column 8 (General Account) and Page ~~1718~~, Line ~~58E24~~, Col. 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0299999, Column 8 (General Account) and Page ~~2423~~, Line 0299999, Column 8 (Separate Accounts).

Column 4: Report the total common stock from Page ~~3334~~, Line ~~17B4~~, Column 8 (General Account) and Page ~~1819~~, Line ~~17B4~~, Col. 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0399999, Column 8 (General Account) and Page ~~2423~~, Line 0399999, Column 8 (Separate Accounts).

Column 5: Report the total real estate from Page ~~3334~~, Line ~~21B4~~, Column 8 (General Account) and from Page ~~1819~~, Line ~~21B4~~, Column 8 (Separate Accounts), if applicable; plus the total other invested assets from Page ~~3537~~, Line ~~105L6~~, Column 8 (General Account) and from Page ~~2022~~, Line ~~105L6~~, Column 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page ~~3638~~, Line 0499999, Column 8 (General Account) and Page ~~2423~~, Line 0499999, Column 8 (Separate Accounts).

**DEFAULT COMPONENT –
BASIC CONTRIBUTION, RESERVE OBJECTIVE, AND MAXIMUM RESERVE CALCULATIONS**

Detail Eliminated To Conserve Space

Section A:

Lines 1 through 7 – Long-Term Bonds, excluding collateralized loan obligations CLOs/CBOs/CDOs

Report the book/adjusted carrying value of all bonds and other fixed income instruments owned, excluding unaffiliated and affiliated non-agency CLOs/CBOs/CDOs reported on Schedule D, Part 1, Section 2, Lines 1099999999 and 1109999999 and Schedule DL, Part 1, Lines 1099999999 and 1109999999 in Columns 1 and 4. Categorize the bonds and other fixed income instruments into NAIC designations 1 through 6 as directed by the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*, except that, exempt obligations should be reported separately. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Line 8 – Intentionally Left Blank

Line 98 – Total Long-Term Bonds

Column 1 should agree with Page 2, Line 1, Column 3 plus Schedule DL Part 1, Column 6, Line 2009999999 minus Schedule D, Part 1, Section 2, Column 8, Lines 1099999999 and 1109999999 minus Schedule DL, Part 1, Column 6, Lines 1099999999 and 1109999999.

Lines 9 through 14 – Collateralized Loan Obligations (CLOs)/Collateralized Bond Obligations (CBOs)/Collateralized Debt Obligations (CDOs)

Report the book/adjusted carrying value of all collateralized loan obligations, collateralized bond obligations, collateralized debt obligations owned, reported as unaffiliated and affiliated non-agency CLOs/CBOs/CDOs on Schedule D, Part 1, Section 2, Lines 1099999999 and 1109999999 and Schedule DL, Part 1, Lines 1099999999 and 1109999999 in Columns 1 and 4. Categorize the ~~collateralized loan obligations~~ CLOs/CBOs/CDOs into NAIC designations 1 through 6 as directed by the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Line 15 – Total Collateralized Loan Obligations CLOs/CBOs/CDOs

Column 1 should agree with Schedule D, Part 1, Section 2, Column 8, Lines 1099999999 and 1109999999 plus Schedule DL, Part 1, Lines 1099999999 and 1109999999.

Section B:

Lines 10 through 158 – Preferred Stocks

Report the book/adjusted carrying value of all preferred stocks owned in Columns 1 and 4. Categorize the preferred stocks into NAIC designations one through six as directed by the NAIC Securities Valuation Office instructions. Multiply the amount in Column 4 for each designation by the reserve

factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Line ~~167~~ – Affiliated Life Insurer with AVR

Report the book/adjusted carrying value of all preferred stocks owned in a controlled or affiliated company, or a subsidiary that is a life or fraternal insurance company that holds an AVR, in Columns 1 and 4. These companies are required to carry their own asset valuation reserve or an equivalent, and therefore the preferred stocks are not required to be included in the asset valuation reserve of an affiliated company.

Line ~~178~~ – Total Preferred Stocks

Column 1 should agree with Page 2, Line 2.1, Column 3 plus Schedule DL, Part 1, Column 6, Line 4509999999.

Section C:

Lines ~~18~~
through ~~247~~ – Short-Term Bonds

Report the book/adjusted carrying value of all short-term bonds and other short-term fixed-income investments (Schedule DA, Part 1 (Line 0509999999) and short-term bonds included on Schedule DL, Part 1, Line 9509999999 owned in Columns 1 and 4. Categorize the short-term bonds and other fixed-income instruments listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* into NAIC designations 1 through 6 as directed by the Securities Valuation Office instructions, except that exempt obligations listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* should be reported separately. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Section D:

Lines ~~261~~
through ~~328~~ – Derivative Instruments

Report the book/adjusted carrying value exposure to counterparty credit risk associated with the use of derivative instruments, net of acceptable collateral, for all counterparties by each SVO designation, from Schedule DB, Part D, Section 1, Column 8. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Line ~~349~~ – Total

Column 6 must be reported on Page 29, Line 7, Column 1.

Column 8 must be reported on Page 29, Line 10, Column 1.

Column 10 must be reported on Page 29, Line 9, Column 1.

Section E:

Lines ~~351~~
through ~~5723~~ – Mortgage Loans

The classification methodology for mortgages is outlined in the Life Risk-Based Capital instructions. Report the book/adjusted carrying value of all Schedule B and Schedule DL, Part 1 mortgage loans owned in Column 1. Any related party encumbrances should be deducted in Column 2. Categorize the mortgage loans as indicated on Lines ~~351~~ through ~~5723~~. Report the difference of Column 1 less Column 2 in Column 4. Multiply the amount in Column 4 for each category by the reserve factors in Columns 5, 7, and 9, and report the products by category in Columns 6, 8, and 10, respectively.

NOTE: Related party encumbrances are loans from the reporting entity and the amount deducted in Column 2 should be reflected in Column 2 in the corresponding section of the AVR worksheet. If the affiliated entity to which the loan was made is not wholly owned by the reporting entity, the related party encumbrance amount deducted in Column 2 should be based on the reporting entity's ownership percentage.

Line ~~5824~~ – Total Schedule B Mortgage Loans on Real Estate

Column 1 should agree with Page 2, Line 3.1 + 3.2, Column 3 plus Schedule DL, Part 1, Column 6, Line 9309999999.

Column 6 must be reported on the Asset Valuation Reserve Page, Line 7, Column 2.

Column 8 must be reported on the Asset Valuation Reserve Page, Line 10, Column 2.

Column 10 must be reported on the Asset Valuation Reserve Page, Line 9, Column 2.

**EQUITY AND OTHER INVESTED ASSET COMPONENT –
BASIC CONTRIBUTION, RESERVE OBJECTIVE, AND MAXIMUM RESERVE CALCULATIONS**

Detail Eliminated To Conserve Space

Section A:

*****Drafting Note: Changes in Blanks Proposal 2025-20BWG for Investment Subs are not shown on this proposal but the Common Stock AVR lines will be under Section A.*****

Detail Eliminated To Conserve Space

Section B:

Lines ~~18~~
through ~~203~~ – Real Estate

Categorize the real estate as indicated on Lines ~~B18~~ through ~~20B3~~. Real estate reported in Schedule DL, Part 1, Line 9209999999 would also be included in this section. Report the sum of Columns 1, 2, and 3 in Column 4. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

NOTE: Related party encumbrances are loans from the reporting entity and the amount reflected in Column 2 should be deducted in Column 2 in the corresponding section of the AVR worksheet. If the real estate entity to which the loan was made is not wholly owned by the reporting entity, the related party encumbrance amount reflected in Column 2 should be based on the reporting entity's ownership percentage. The amount of the third-party encumbrances without recourse to be reflected in Column 3 is limited to the extent that the maximum reserve (Column 6) should not exceed the sum of the book/adjusted carrying value (Column 1) plus related party encumbrances (Column 2) and third-party encumbrances with recourse which are included in Column 3.

Line ~~214~~ – Total Real Estate

The Columns 6, 8, and 10 amounts must be combined with ~~Line 83~~ Section L, Line 6, Columns 6, 8, and 10 amounts and reported on the Asset Valuation Reserve Page, Lines 7, 10, and 9, Column 5.

Section C:

Lines ~~221~~
through ~~287~~ – Other Invested Assets with Underlying Characteristics of Bonds

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investment are similar to bonds (Lines 0199999, 0299999, 0599999, 0699999, 0999999, 1099999, 1399999, and 1499999) that have been valued according to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* in Columns 1 and 4. Follow the SVO guidelines and categorize these assets into NAIC designations one through six as directed by the NAIC Securities Valuation Office instructions, except those exempt obligations (as listed in the AVR instructions for Line 2) which should be reported separately. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9 and report the products by designation in Columns 6, 8, and 10, respectively.

Section D:

Lines ~~301~~
through ~~3587~~ – Other Invested Assets with Underlying Characteristics of Preferred Stocks

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investment are similar to preferred stocks (Lines 1799999 and 1899999). Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Section E:

Lines ~~381~~
through ~~63267~~ – Other Invested Assets with Underlying Characteristics of Mortgage Loans

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investment are similar to mortgage loans (Lines 2399999 and 2499999), excluding any mortgage-backed/asset-backed securities included in Lines ~~22-C1~~ through ~~28-C7~~ above, in Columns 1 and 4. Categorize the mortgage loans as indicated in Lines ~~38-E1~~ through ~~55E18E27~~.

For Lines ~~38-E1~~ through ~~63E27~~, the classification methodology for mortgages is outlined in the Life Risk-Based Capital instructions. Multiply the amount in Column 4 for each category by the reserve factors in Columns 5, 7, and 9, Lines ~~38-E1~~ through ~~63E27~~. Report the products by category in Columns 6, 8, and 10, respectively.

Section F:

Lines ~~651~~
through ~~695~~ – Other Invested Assets with Underlying Characteristics of Common Stocks

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investments are similar to common stock (Lines 1999999 and 2099999) in Columns 1 and 4. Line ~~68-F4~~ should show all Schedule BA assets owned where the characteristics of the underlying investments are similar to subsidiary, controlled or affiliated company common stocks owned and these assets should be valued according to the *SSAP No. 48—Joint Ventures, Partnerships or Limited Liability Companies*. Categorize these assets consistent with the directions for Pages ~~32-34~~ and ~~3335~~, Lines ~~A1~~ through ~~A4~~, ~~A15~~, and ~~A16~~. For Line ~~65F1~~, the reserve factor must be calculated on an individual company basis. It is equal to 15.8% times the beta factor as discussed in the Pages ~~32-34~~ and ~~3335~~, Line ~~A1~~ instructions, and must be at least 12.15% but not more than 24.31%. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively. For Lines 66 through 69, multiply the amounts in Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Section G:

Line 74 – Total Other Invested Assets with Underlying Characteristics of Real Estate

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investment are similar to real estate (Lines 2199999 and 2299999 items that are not reported in AVR category of Other Invested Assets with Underlying Characteristics of Mortgage Loans) in Column 1, any related encumbrances on these assets in Column 2, and any third-party encumbrances on these assets in Column 3. Report the sum of Columns 1, 2, and 3 in Column 4. Column 4 may not be less than zero. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

NOTE: Related party encumbrances are loans from the reporting entity and the amount reflected in Column 2 should be deducted in Column 2 in the corresponding section of the AVR worksheet. If the real estate entity to which the loan was made is not wholly owned by the reporting entity, the related party encumbrance amount reflected in Column 2 should be based on the reporting entity's ownership percentage. The amount of the third-party encumbrances without recourse to be reflected in Column 3 is limited to the extent that the maximum reserve (Column 10) should not exceed the sum of the book/adjusted carrying value (Column 1) plus related party encumbrances (Column 2) and third party encumbrances with recourse which are included in Column 3.

Section H:

Lines 751
through 795 – Investments in Tax Credit Structures

Report Column 1 in accordance with *SSAP No. 93—Investments in Tax Credit Structures*.

Investments in tax credit structures (tax credit investments) must meet the requirements of SSAP No. 93 to be reported on Lines 75-H1 through 79-H54.

Only tax credits investments which issue federal tax credits and have the following risk mitigation factors can be reported as qualifying federal tax credit investments on Line 76-H2:

- I. A level of leverage below 50%. For a tax credit investment fund, the level of leverage is measured at the fund level.
- II. There is a Tax Credit Guarantee Agreement, or equivalent insurance acquired, at arm's length, by the investor. This agreement requires the General Partner, managing member, developer, or insurer to reimburse investors for any shortfalls in tax credits due to errors of compliance, for the duration of the regulatory compliance period of the tax credit program. For a tax credit investment fund, a Tax Credit Guarantee Agreement is required from the developers of the lower tier projects to the upper tier partnership.
- III. There are sufficient operating reserves, capital replacement reserves and/or operating deficit guarantees present to mitigate foreseeable loss risks as of the current reporting period.

Line 76-H2 should equal Schedule BA, Part 1, Column 12, Line 3799999 + Line 3899999.

Only tax credit investments which issue state tax credits and, at a minimum, have an all-inclusive guarantee from a CRP-rated entity that guarantees the yield on the investment can be reported as yield guaranteed state investments on Line 75-H1. Line 75-H1 should equal Schedule BA, Part 1, Column 12, Line 3599999 + Line 3699999.

Tax credit investments which issue state tax credits and, at a minimum, meet the same requirements for qualifying federal tax credit investments (as detailed above) should be reported as qualifying state tax credit investments on Line 77-H3. Line 77-H3 should equal Schedule BA, Part 1, Column 12, Line 3999999 + Line 4099999.

All other tax credit investments which cannot be reported on Lines 75-H1 through 77-H3 should be reported as other tax credit investments on Line 78-H4. Line 78-H4 should equal Schedule BA, Part 1, Column 12, Line 4199999 + Line 4299999.

Multiply the amount in Column 4 for each category by the reserve factors for Page 3536, Columns 5, 7, and 9, Lines 75-H1 through 78-H4. Report the products by category in Columns 6, 8, and 10, respectively.

Section I:

Lines ~~801~~
through ~~9013~~ – Residual Tranches or Interests

Line ~~801~~ – Bonds – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4499999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively

Line ~~812~~ – Bonds – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4599999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~823~~ – Common Stock – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4899999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~834~~ – Common Stock – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4999999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~845~~ – Preferred Stock – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4699999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~856~~ – Preferred Stock – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4799999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~867~~ – Real Estate – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5099999 in Column 1, any related encumbrances on these assets in Column 2, and any third-party encumbrances on these assets in Column 3. Report the sum of Columns 1, 2, and 3 in Column 4. Column 4 may not be less than zero. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~878~~ – Real Estate – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5199999 in Column 1, any related encumbrances on these assets in Column 2, and any third-party encumbrances on these assets in Column 3. Report the sum of Columns 1, 2, and 3 in Column 4. Column 4 may not be less than zero. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~889~~ – Mortgage Loans – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5299999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7, and 9. Report the products in Columns 6, 8, and 10, respectively.

Line ~~8910~~ – Mortgage Loans – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5399999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7, and 9. Report the products in Columns 6, 8, and 10, respectively.

Line ~~9011~~ – Other – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5499999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7, and 9. Report the products in Columns 6, 8, and 10, respectively.

Line ~~9112~~ – Other – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 5599999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7, and 9. Report the products in Columns 6, 8, and 10, respectively.

Section J:

Lines ~~931~~
through ~~997~~ – Surplus Notes and Capital Notes

Report the book/adjusted carrying value of all Schedule BA assets owned where the characteristics of the underlying investment are similar to surplus notes and capital notes in Columns 1 and 4. Use the Credit Rating Provider (CRP) rating to categorize these assets as if the SVO had assigned an NAIC designation of 1 through 6. If no CRP rating, then report based on the reporting entity's assumption of credit risk. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Section K:

Lines ~~100~~
through ~~11213~~ – Collateral Loans

Line ~~1001~~ – Backed by Mortgage Loans – Unaffiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 3199999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.

Line ~~1012~~ – Backed by Mortgage Loans – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 3299999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.

- Line ~~1023~~ – Backed by Investments in Joint Ventures, Partnerships or Limited Liability Companies – Unaffiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3399999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1034~~ – Backed by Investments in Joint Ventures, Partnerships or Limited Liability Companies – Affiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3499999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1045~~ – Backed by Residual Tranches or Interests – Unaffiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3599999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1056~~ – Backed by Residual Tranches or Interests – Affiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3699999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1067~~ – Backed by Debt Securities – Unaffiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3799999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1078~~ – Backed by Debt Securities – Affiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3899999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~1089~~ – Backed by Real Estate – Unaffiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 3999999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~10910~~ – Backed by Real Estate – Affiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 4099999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.
- Line ~~11011~~ – Collateral Loans – All Other – Unaffiliated
- Report the book/adjusted carrying value of all Schedule BA assets in Line 4199999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.

Line ~~111~~12 – Collateral Loans – All Other – Affiliated

Report the book/adjusted carrying value of all Schedule BA assets in Line 4299999 in Columns 1 and 4. Multiply the amount in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products in Columns 6, 8 and 10, respectively.

Section L:

Line ~~100-1~~ & ~~1012~~ – Working Capital Finance Investments

Report the book/adjusted carrying value of all working capital finance investments owned (Schedule BA, Part 1, Line 4399999) in Columns 1 and 4. Categorize the working capital finance investments into NAIC designations 1 or 2 as directed by the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*. Multiply the amount in Column 4 for each designation by the reserve factors provided in Columns 5, 7, and 9, and report the products by designation in Columns 6, 8, and 10, respectively.

Line ~~1023~~ – Other Invested Assets – Schedule BA

Report the book/adjusted carrying value of all other Schedule BA investments owned that cannot be classified into one of the above categories in Column 1 and any encumbrances on these assets in Column 3. Schedule DL, Part 1 investments reported on Line 9409999999 would be included in this total if not classified in one of the above categories. Collateral loans (Lines 3199999 and 3299999) have been intentionally excluded from this total. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7, and 9, and report the products in Columns 6, 8, and 10, respectively.

Line ~~1034~~ – Other Short-Term Invested Assets – Schedule DA

Report the book/adjusted carrying value of all other Schedule DA (Lines 7029999999 and 7509999999) and Schedule DL, Part 1 (Line 9509999999) assets owned that cannot be classified into one of the above categories in Column 1 and any encumbrances on these assets in Column 3. Report the sum of Columns 1 and 3 in Column 4. Multiply the amount on Column 4 by the reserve factors provided in Columns 5, 7, and 9 and report the products in Columns 6, 8, and 10, respectively.

Line ~~1056~~ – Total Other Invested Assets – Schedules BA & DA

The Columns 6, 8, and 10 amounts must be combined with Columns 6, 8, and 10, Line ~~21-B4~~ amounts and reported on the Asset Valuation Reserve Page, Column 5, Lines 7, 10, and 9, respectively.

NOTE: Other invested asset reserves will be calculated based on the nature of the underlying investments related to the Schedule BA and Schedule DA assets. Assets should be categorized as if the company owned the underlying investment. For example:

- Mortgage participation certificates and similar holdings should be classified as fixed income assets.
- Gas and oil production and mineral rights have potential variability of return and should be categorized as equity investments.
- Partnership investments should be classified as fixed or equity investments or as equity real estate, depending on the purpose of the partnership. The maximum AVR factor would be that appropriate for the asset classification.
- A “look through” approach should be taken for any Schedule BA and Schedule DA assets not specifically listed, so as to reflect in the AVR calculation the essential nature of the investments.

**ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, HEALTH, PROPERTY, TITLE, SEPARATE ACCOUNTS,
AND PROTECTED CELL**

SCHEDULE D – PART 1 – SECTION 2

ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR



NAIC Designation Category Footnote:

Provide the total book/adjusted carrying value amount by NAIC Designation Category that represents the amount reported in Column 8.

The sum of the amounts reported for each NAIC Designation Category in the footnote should equal Line 1909999999.

Collateralized Loan Obligation CLOs/CBOs/CDOs Footnote:

Report the book/adjusted carrying value amount by NAIC Designation Category of all collateralized loan obligations CLOs/CBOs/CDOs owned reported in Lines 1099999999 and 1109999999

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL AND SEPARATE ACCOUNTS

**ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT**

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|------------------|------------------|--|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION A | | | | | | | | | | | | |
| | | LONG-TERM BONDS EXCLUDING COLLATERALIZED LOAN OBLIGATIONS/CLOs/CBOs/CDOs | | | | | | | | | | |
| 1 | | Exempt obligations..... | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 2.1 | 1 | NAIC Designation Category 1.A..... | | XXX | XXX | | 0.0002 | | 0.0007 | | 0.0013 | |
| 2.2 | 1 | NAIC Designation Category 1.B..... | | XXX | XXX | | 0.0004 | | 0.0011 | | 0.0023 | |
| 2.3 | 1 | NAIC Designation Category 1.C..... | | XXX | XXX | | 0.0006 | | 0.0018 | | 0.0035 | |
| 2.4 | 1 | NAIC Designation Category 1.D..... | | XXX | XXX | | 0.0007 | | 0.0022 | | 0.0044 | |
| 2.5 | 1 | NAIC Designation Category 1.E..... | | XXX | XXX | | 0.0009 | | 0.0027 | | 0.0055 | |
| 2.6 | 1 | NAIC Designation Category 1.F..... | | XXX | XXX | | 0.0011 | | 0.0034 | | 0.0068 | |
| 2.7 | 1 | NAIC Designation Category 1.G..... | | XXX | XXX | | 0.0014 | | 0.0042 | | 0.0085 | |
| 2.8 | | Subtotal NAIC 1 (Sum of Lines A2.1+2.2+2.3+2.4+2.5+2.6+ through A2.7)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 3.1 | 2 | NAIC Designation Category 2.A..... | | XXX | XXX | | 0.0021 | | 0.0063 | | 0.0105 | |
| 3.2 | 2 | NAIC Designation Category 2.B..... | | XXX | XXX | | 0.0025 | | 0.0076 | | 0.0127 | |
| 3.3 | 2 | NAIC Designation Category 2.C..... | | XXX | XXX | | 0.0036 | | 0.0108 | | 0.0180 | |
| 3.4 | | Subtotal NAIC 2 (Sum of Lines A3.1+3.2+ through A3.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 4.1 | 3 | NAIC Designation Category 3.A..... | | XXX | XXX | | 0.0069 | | 0.0183 | | 0.0262 | |
| 4.2 | 3 | NAIC Designation Category 3.B..... | | XXX | XXX | | 0.0099 | | 0.0264 | | 0.0377 | |
| 4.3 | 3 | NAIC Designation Category 3.C..... | | XXX | XXX | | 0.0131 | | 0.0350 | | 0.0500 | |
| 4.4 | | Subtotal NAIC 3 (Sum of Lines A4.1+4.2+ through A4.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 5.1 | 4 | NAIC Designation Category 4.A..... | | XXX | XXX | | 0.0184 | | 0.0430 | | 0.0615 | |
| 5.2 | 4 | NAIC Designation Category 4.B..... | | XXX | XXX | | 0.0238 | | 0.0555 | | 0.0793 | |
| 5.3 | 4 | NAIC Designation Category 4.C..... | | XXX | XXX | | 0.0310 | | 0.0724 | | 0.1034 | |
| 5.4 | | Subtotal NAIC 4 (Sum of Lines A5.1+5.2+ through A5.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 6.1 | 5 | NAIC Designation Category 5.A..... | | XXX | XXX | | 0.0472 | | 0.0846 | | 0.1410 | |
| 6.2 | 5 | NAIC Designation Category 5.B..... | | XXX | XXX | | 0.0663 | | 0.1188 | | 0.1980 | |
| 6.3 | 5 | NAIC Designation Category 5.C..... | | XXX | XXX | | 0.0836 | | 0.1498 | | 0.2496 | |
| 6.4 | | Subtotal NAIC 5 (Sum of Lines A6.1+6.2+ through A6.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 7 | 6 | NAIC 6..... | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 8 | | Intentionally left blank..... | XXX | XXX | XXX | XXX | XXX | XXX | XXX | XXX | XXX | XXX |
| 98 | | Total long-term bonds excluding CLOs/CBOs/CDOs (Sum of Lines A1+ A2.8+ A3.4+ A4.4+ A5.4+ A6.4+ and A7+8) | | XXX | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|---|------------------|---|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION A | | | | | | | | | | | | |
| (Continued) | | | | | | | | | | | | |
| COLLATERAL LOAN OBLIGATIONS/CLOs/CBOs/CDOs | | | | | | | | | | | | |
| 9.1 | 1 | NAIC Designation Category 1.A | | XXX | XXX | | 0.0002 | | 0.0007 | | 0.0013 | |
| 9.2 | 1 | NAIC Designation Category 1.B | | XXX | XXX | | 0.0004 | | 0.0011 | | 0.0023 | |
| 9.3 | 1 | NAIC Designation Category 1.C | | XXX | XXX | | 0.0006 | | 0.0018 | | 0.0035 | |
| 9.4 | 1 | NAIC Designation Category 1.D | | XXX | XXX | | 0.0007 | | 0.0022 | | 0.0044 | |
| 9.5 | 1 | NAIC Designation Category 1.E | | XXX | XXX | | 0.0009 | | 0.0027 | | 0.0055 | |
| 9.6 | 1 | NAIC Designation Category 1.F | | XXX | XXX | | 0.0011 | | 0.0034 | | 0.0068 | |
| 9.7 | 1 | NAIC Designation Category 1.G | | XXX | XXX | | 0.0014 | | 0.0042 | | 0.0085 | |
| 9.8 | | Subtotal NAIC 1 (Sum of Lines A9.1 through A9.7) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 10.1 | 2 | NAIC Designation Category 2.A | | XXX | XXX | | 0.0021 | | 0.0063 | | 0.0105 | |
| 10.2 | 2 | NAIC Designation Category 2.B | | XXX | XXX | | 0.0025 | | 0.0076 | | 0.0127 | |
| 10.3 | 2 | NAIC Designation Category 2.C | | XXX | XXX | | 0.0036 | | 0.0108 | | 0.0180 | |
| 10.4 | | Subtotal NAIC 2 (Sum of Lines A10.1 through A10.3) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 11.1 | 3 | NAIC Designation Category 3.A | | XXX | XXX | | 0.0069 | | 0.0183 | | 0.0262 | |
| 11.2 | 3 | NAIC Designation Category 3.B | | XXX | XXX | | 0.0099 | | 0.0264 | | 0.0377 | |
| 11.3 | 3 | NAIC Designation Category 3.C | | XXX | XXX | | 0.0131 | | 0.0350 | | 0.0500 | |
| 11.4 | | Subtotal NAIC 3 (Sum of Lines A11.1 through A11.3) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 12.1 | 4 | NAIC Designation Category 4.A | | XXX | XXX | | 0.0184 | | 0.0430 | | 0.0615 | |
| 12.2 | 4 | NAIC Designation Category 4.B | | XXX | XXX | | 0.0238 | | 0.0555 | | 0.0793 | |
| 12.3 | 4 | NAIC Designation Category 4.C | | XXX | XXX | | 0.0310 | | 0.0724 | | 0.1034 | |
| 12.4 | | Subtotal NAIC 4 (Sum of Lines A12.1 through A12.3) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 13.1 | 5 | NAIC Designation Category 5.A | | XXX | XXX | | 0.0472 | | 0.0846 | | 0.1410 | |
| 13.2 | 5 | NAIC Designation Category 5.B | | XXX | XXX | | 0.0663 | | 0.1188 | | 0.1980 | |
| 13.3 | 5 | NAIC Designation Category 5.C | | XXX | XXX | | 0.0836 | | 0.1498 | | 0.2496 | |
| 13.4 | | Subtotal NAIC 5 (Sum of Lines A13.1 through A13.3) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 14 | 6 | NAIC 6 | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 15 | | Total collateral loan obligations/CLOs/CBOs/CDOs (Sum of Lines A9.8+A10.4+A11.4+A12.4+A13.4+A14) | | XXX | XXX | | XXX | | XXX | | XXX | |
| 16 | | Total long-term bonds and collateral loan obligations (Sum of Lines A8 and +A15) | | XXX | XXX | | XXX | | XXX | | XXX | |
| SECTION B | | | | | | | | | | | | |
| PREFERRED STOCKS | | | | | | | | | | | | |
| 10 | 1 | Highest quality | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 11 | 2 | High quality | | XXX | XXX | | 0.0021 | | 0.0064 | | 0.0106 | |
| 12 | 3 | Medium quality | | XXX | XXX | | 0.0099 | | 0.0263 | | 0.0376 | |
| 13 | 4 | Low quality | | XXX | XXX | | 0.0245 | | 0.0572 | | 0.0817 | |
| 14 | 5 | Lower quality | | XXX | XXX | | 0.0630 | | 0.1128 | | 0.1880 | |
| 15 | 6 | In or near default | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 16 | | Affiliated life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 17 | | Total preferred stocks (Sum of Lines B10 through B16) | | XXX | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|------------------------|------------------|--|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION C | | | | | | | | | | | | |
| SHORT-TERM BONDS | | | | | | | | | | | | |
| 18 | | Exempt obligations..... | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 192.1 | 1 | NAIC Designation Category 1.A..... | | XXX | XXX | | 0.0002 | | 0.0007 | | 0.0013 | |
| 192.2 | 1 | NAIC Designation Category 1.B..... | | XXX | XXX | | 0.0004 | | 0.0011 | | 0.0023 | |
| 192.3 | 1 | NAIC Designation Category 1.C..... | | XXX | XXX | | 0.0006 | | 0.0018 | | 0.0035 | |
| 192.4 | 1 | NAIC Designation Category 1.D..... | | XXX | XXX | | 0.0007 | | 0.0022 | | 0.0044 | |
| 192.5 | 1 | NAIC Designation Category 1.E..... | | XXX | XXX | | 0.0009 | | 0.0027 | | 0.0055 | |
| 192.6 | 1 | NAIC Designation Category 1.F..... | | XXX | XXX | | 0.0011 | | 0.0034 | | 0.0068 | |
| 192.7 | 1 | NAIC Designation Category 1.G..... | | XXX | XXX | | 0.0014 | | 0.0042 | | 0.0085 | |
| 192.8 | | Subtotal NAIC 1 (19.1+19.2+19.3+19.4+19.5+19.6+19.7)Sum of Lines C.1 through C.7)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 203.1 | 2 | NAIC Designation Category 2.A..... | | XXX | XXX | | 0.0021 | | 0.0063 | | 0.0105 | |
| 203.2 | 2 | NAIC Designation Category 2.B..... | | XXX | XXX | | 0.0025 | | 0.0076 | | 0.0127 | |
| 203.3 | 2 | NAIC Designation Category 2.C..... | | XXX | XXX | | 0.0036 | | 0.0108 | | 0.0180 | |
| 203.4 | | Subtotal NAIC 2 (20.1+20.2+20.3)Sum of Lines C.3.1 through C.3.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 214.1 | 3 | NAIC Designation Category 3.A..... | | XXX | XXX | | 0.0069 | | 0.0183 | | 0.0262 | |
| 214.2 | 3 | NAIC Designation Category 3.B..... | | XXX | XXX | | 0.0099 | | 0.0264 | | 0.0377 | |
| 214.3 | 3 | NAIC Designation Category 3.C..... | | XXX | XXX | | 0.0131 | | 0.0350 | | 0.0500 | |
| 214.4 | | Subtotal NAIC 3 (Sum of Lines C.4.1 through C.4.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 225.1 | 4 | NAIC Designation Category 4.A..... | | XXX | XXX | | 0.0184 | | 0.0430 | | 0.0615 | |
| 225.2 | 4 | NAIC Designation Category 4.B..... | | XXX | XXX | | 0.0238 | | 0.0555 | | 0.0793 | |
| 225.3 | 4 | NAIC Designation Category 4.C..... | | XXX | XXX | | 0.0310 | | 0.0724 | | 0.1034 | |
| 225.4 | | Subtotal NAIC 4 (Sum of Lines C.5.1 through C.5.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 236.1 | 5 | NAIC Designation Category 5.A..... | | XXX | XXX | | 0.0472 | | 0.0846 | | 0.1410 | |
| 236.2 | 5 | NAIC Designation Category 5.B..... | | XXX | XXX | | 0.0663 | | 0.1188 | | 0.1980 | |
| 236.3 | 5 | NAIC Designation Category 5.C..... | | XXX | XXX | | 0.0836 | | 0.1498 | | 0.2496 | |
| 236.4 | | Subtotal NAIC 5 (Sum of Lines C.6.1 through C.6.3)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 247 | 6 | NAIC 6..... | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 258 | | Total short-term bonds (Sum of Lines C.1, C.2.8, C.3.4, C.4.4, C.5.4, C.6.4, and C.7.4)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| SECTION D | | | | | | | | | | | | |
| DERIVATIVE INSTRUMENTS | | | | | | | | | | | | |
| 261 | | Exchange traded..... | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 272 | 1 | Highest quality..... | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 283 | 2 | High quality..... | | XXX | XXX | | 0.0021 | | 0.0064 | | 0.0106 | |
| 294 | 3 | Medium quality..... | | XXX | XXX | | 0.0099 | | 0.0263 | | 0.0376 | |
| 305 | 4 | Low quality..... | | XXX | XXX | | 0.0245 | | 0.0572 | | 0.0817 | |
| 316 | 5 | Lower quality..... | | XXX | XXX | | 0.0630 | | 0.1128 | | 0.1880 | |
| 327 | 6 | In or near default..... | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 338 | | Total derivative instruments (Sum of Lines D.1 through D.7)..... | | XXX | XXX | | XXX | | XXX | | XXX | |
| 349 | | Total Section A through D (Sum of Lines 9+17+25+33D.1 through D.8, A.16, B.8, C.8, and D.8)..... | | XXX | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|----------------------------|------------------|---|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION E | | | | | | | | | | | | |
| MORTGAGE LOANS | | | | | | | | | | | | |
| In Good Standing: | | | | | | | | | | | | |
| 351 | | Farm mortgages – CM1 – highest quality | | | XXX | | 0.0011 | | 0.0057 | | 0.0074 | |
| 362 | | Farm mortgages – CM2 – high quality | | | XXX | | 0.0040 | | 0.0114 | | 0.0149 | |
| 373 | | Farm mortgages – CM3 – medium quality | | | XXX | | 0.0069 | | 0.0200 | | 0.0257 | |
| 384 | | Farm mortgages – CM4 – low medium quality | | | XXX | | 0.0120 | | 0.0343 | | 0.0428 | |
| 395 | | Farm mortgages – CM5 – low quality | | | XXX | | 0.0183 | | 0.0486 | | 0.0628 | |
| 406 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0003 | | 0.0007 | | 0.0011 | |
| 417 | | Residential mortgages – all other | | | XXX | | 0.0015 | | 0.0034 | | 0.0046 | |
| 428 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0003 | | 0.0007 | | 0.0011 | |
| 439 | | Commercial mortgages – all other – CM1 – highest quality | | | XXX | | 0.0011 | | 0.0057 | | 0.0074 | |
| 4410 | | Commercial mortgages – all other – CM2 – high quality | | | XXX | | 0.0040 | | 0.0114 | | 0.0149 | |
| 4511 | | Commercial mortgages – all other – CM3 – medium quality | | | XXX | | 0.0069 | | 0.0200 | | 0.0257 | |
| 4612 | | Commercial mortgages – all other – CM4 – low medium quality | | | XXX | | 0.0120 | | 0.0343 | | 0.0428 | |
| 4713 | | Commercial mortgages – all other – CM5 – low quality | | | XXX | | 0.0183 | | 0.0486 | | 0.0628 | |
| Overdue, Not in Process: | | | | | | | | | | | | |
| 4814 | | Farm mortgages | | | XXX | | 0.0480 | | 0.0868 | | 0.1371 | |
| 4915 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0006 | | 0.0014 | | 0.0023 | |
| 5016 | | Residential mortgages – all other | | | XXX | | 0.0029 | | 0.0066 | | 0.0103 | |
| 5117 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0006 | | 0.0014 | | 0.0023 | |
| 5218 | | Commercial mortgages – all other | | | XXX | | 0.0480 | | 0.0868 | | 0.1371 | |
| In Process of Foreclosure: | | | | | | | | | | | | |
| 5319 | | Farm mortgages | | | XXX | | 0.0000 | | 0.1942 | | 0.1942 | |
| 5420 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0000 | | 0.0046 | | 0.0046 | |
| 5521 | | Residential mortgages – all other | | | XXX | | 0.0000 | | 0.0149 | | 0.0149 | |
| 5622 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0000 | | 0.0046 | | 0.0046 | |
| 5723 | | Commercial mortgages – all other | | | XXX | | 0.0000 | | 0.1942 | | 0.1942 | |
| 5824 | | Total Schedule B mortgages (Sum of Lines 35E1 through 57E23) | | | XXX | | XXX | | XXX | | XXX | |

**ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT**

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|--|------------------|---|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION A | | | | | | | | | | | | |
| COMMON STOCK | | | | | | | | | | | | |
| 1 | | Unaffiliated public..... | | XXX | XXX | | 0.0000 | | 0.1580 (a) | | 0.1580 (a) | |
| 2 | | Unaffiliated private | | XXX | XXX | | 0.0000 | | 0.1945 | | 0.1945 | |
| 3 | | Federal Home Loan Bank | | XXX | XXX | | 0.0000 | | 0.0061 | | 0.0097 | |
| 4 | | Affiliated life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| Affiliated Investment Subsidiary: | | | | | | | | | | | | |
| 5 | | Fixed income exempt obligations..... | | | | | XXX | | XXX | | XXX | |
| 6 | | Fixed income highest quality..... | | | | | XXX | | XXX | | XXX | |
| 7 | | Fixed income high quality | | | | | XXX | | XXX | | XXX | |
| 8 | | Fixed income medium quality | | | | | XXX | | XXX | | XXX | |
| 9 | | Fixed income low quality | | | | | XXX | | XXX | | XXX | |
| 10 | | Fixed income lower quality | | | | | XXX | | XXX | | XXX | |
| 11 | | Fixed income in or near default | | | | | XXX | | XXX | | XXX | |
| 12 | | Unaffiliated common stock public..... | | | | | 0.0000 | | 0.1580 (a) | | 0.1580 (a) | |
| 13 | | Unaffiliated common stock private..... | | | | | 0.0000 | | 0.1945 | | 0.1945 | |
| 14 | | Real estate | | | | | (b) | | (b) | | (b) | |
| 15 | | Affiliated-certain other (See SVO Purposes & Procedures Manual)..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 16 | | Affiliated - all other | | XXX | XXX | | 0.0000 | | 0.1945 | | 0.1945 | |
| 17 | | Total common stock (Sum of Lines <u>A1</u> through <u>A16</u>) | | | | | XXX | | XXX | | XXX | |
| SECTION B | | | | | | | | | | | | |
| REAL ESTATE | | | | | | | | | | | | |
| 18 | | Home office property (General Account only)..... | | | | | 0.0000 | | 0.0912 | | 0.0912 | |
| 19 | | Investment properties | | | | | 0.0000 | | 0.0912 | | 0.0912 | |
| 20 | | Properties acquired in satisfaction of debt..... | | | | | 0.0000 | | 0.1337 | | 0.1337 | |
| 21 | | Total real estate (Sum of Lines <u>B18</u> through <u>B20</u>) | | | | | XXX | | XXX | | XXX | |
| SECTION C | | | | | | | | | | | | |
| OTHER INVESTED ASSETS INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF BONDS | | | | | | | | | | | | |
| 22 | | Exempt obligations..... | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 23 | 1 | Highest quality | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 24 | 2 | High quality | | XXX | XXX | | 0.0021 | | 0.0064 | | 0.0106 | |
| 25 | 3 | Medium quality..... | | XXX | XXX | | 0.0099 | | 0.0263 | | 0.0376 | |
| 26 | 4 | Low quality..... | | XXX | XXX | | 0.0245 | | 0.0572 | | 0.0817 | |
| 27 | 5 | Lower quality | | XXX | XXX | | 0.0630 | | 0.1128 | | 0.1880 | |
| 28 | 6 | In or near default | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 29 | | Total with bond characteristics (Sum of Lines <u>C122</u> through <u>C728</u>) | | XXX | XXX | | XXX | | XXX | | XXX | |

Drafting Note: Changes in Blanks Proposal 2025-20BWG for Investment Subs are not shown on this proposal but the Common Stock AVR lines will be under Section A.

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|---|------------------|--|---|--|---|--|--------------------|---------------------------|-------------------|----------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols.4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols.4x9) |
| SECTION D | | | | | | | | | | | | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF PREFERRED STOCKS | | | | | | | | | | | | |
| 301 | 1 | Highest quality | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 342 | 2 | High quality | | XXX | XXX | | 0.0021 | | 0.0064 | | 0.0106 | |
| 323 | 3 | Medium quality | | XXX | XXX | | 0.0099 | | 0.0263 | | 0.0376 | |
| 334 | 4 | Low quality | | XXX | XXX | | 0.0245 | | 0.0572 | | 0.0817 | |
| 345 | 5 | Lower quality | | XXX | XXX | | 0.0630 | | 0.1128 | | 0.1880 | |
| 356 | 6 | In or near default | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 367 | | Affiliated life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 378 | | Total with preferred stock characteristics (Sum of Lines 301 through 367) | | XXX | XXX | | XXX | | XXX | | XXX | |
| SECTION E | | | | | | | | | | | | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF MORTGAGE LOANS | | | | | | | | | | | | |
| In Good Standing Affiliated: | | | | | | | | | | | | |
| 381 | | Mortgages – CM1 – highest quality | | | XXX | | 0.0011 | | 0.0057 | | 0.0074 | |
| 392 | | Mortgages – CM2 – high quality | | | XXX | | 0.0040 | | 0.0114 | | 0.0149 | |
| 403 | | Mortgages – CM3 – medium quality | | | XXX | | 0.0069 | | 0.0200 | | 0.0257 | |
| 444 | | Mortgages – CM4 – low medium quality | | | XXX | | 0.0120 | | 0.0343 | | 0.0428 | |
| 425 | | Mortgages – CM5 – low quality | | | XXX | | 0.0183 | | 0.0486 | | 0.0628 | |
| 436 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0003 | | 0.0007 | | 0.0011 | |
| 447 | | Residential mortgages – all other | | XXX | XXX | | 0.0015 | | 0.0034 | | 0.0046 | |
| 458 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0003 | | 0.0007 | | 0.0011 | |
| Overdue, Not in Process Affiliated: | | | | | | | | | | | | |
| 469 | | Farm mortgages | | | XXX | | 0.0480 | | 0.0868 | | 0.1371 | |
| 4710 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0006 | | 0.0014 | | 0.0023 | |
| 4811 | | Residential mortgages – all other | | | XXX | | 0.0029 | | 0.0066 | | 0.0103 | |
| 4912 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0006 | | 0.0014 | | 0.0023 | |
| 5013 | | Commercial mortgages – all other | | | XXX | | 0.0480 | | 0.0868 | | 0.1371 | |
| In Process of Foreclosure Affiliated: | | | | | | | | | | | | |
| 5414 | | Farm mortgages | | | XXX | | 0.0000 | | 0.1942 | | 0.1942 | |
| 5215 | | Residential mortgages – insured or guaranteed | | | XXX | | 0.0000 | | 0.0046 | | 0.0046 | |
| 5216 | | Residential mortgages – all other | | | XXX | | 0.0000 | | 0.0149 | | 0.0149 | |
| 5417 | | Commercial mortgages – insured or guaranteed | | | XXX | | 0.0000 | | 0.0046 | | 0.0046 | |
| 5518 | | Commercial mortgages – all other | | | XXX | | 0.0000 | | 0.1942 | | 0.1942 | |
| 5619 | | Total affiliated (Sum of Lines 38-DE1 through 55DE18) | | | XXX | | XXX | | XXX | | XXX | |
| 5720 | | Unaffiliated – in good standing with covenants | | | XXX | | (c) | | (c) | | (c) | |
| 5821 | | Unaffiliated – in good standing defeased with government securities | | | XXX | | 0.0011 | | 0.0057 | | 0.0074 | |
| 5922 | | Unaffiliated – in good standing primarily senior | | | XXX | | 0.0040 | | 0.0114 | | 0.0149 | |
| 6023 | | Unaffiliated – in good standing all other | | | XXX | | 0.0069 | | 0.0200 | | 0.0257 | |
| 24 | | Unaffiliated – in good standing – residential mortgages - all other | | XXX | XXX | | 0.0015 | | 0.0034 | | 0.0046 | |
| 64245 | | Unaffiliated – overdue, not in process | | | XXX | | 0.0480 | | 0.0868 | | 0.1371 | |
| 62256 | | Unaffiliated – in process of foreclosure | | | XXX | | 0.0000 | | 0.1942 | | 0.1942 | |
| 62267 | | Total unaffiliated (Sum of Lines 57-DE20 through 62DE256) | | | XXX | | XXX | | XXX | | XXX | |
| 64278 | | Total with mortgage loan characteristics (Sum of Lines 56-DE19 + and 62DE267) | | | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|---|------------------|--|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-----------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| SECTION F | | | | | | | | | | | | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF COMMON STOCK | | | | | | | | | | | | |
| 651 | | Unaffiliated public..... | | XXX | XXX | | 0.0000 | | 0.1580(a) | | 0.1580(a) | |
| 662 | | Unaffiliated private..... | | XXX | XXX | | 0.0000 | | 0.1945 | | 0.1945 | |
| 673 | | Affiliated life with AVR..... | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 684 | | Affiliated certain other (See SVO Purposes & Procedures Manual)..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 695 | | Affiliated other - all other..... | | XXX | XXX | | 0.0000 | | 0.1945 | | 0.1945 | |
| 706 | | Total with common stock characteristics (Sum of Lines 65-F1 through F569) | | XXX | XXX | | XXX | | XXX | | XXX | |
| SECTION G | | | | | | | | | | | | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF REAL ESTATE | | | | | | | | | | | | |
| 71 | | Home office property (General Account only)..... | | | | | 0.0000 | | 0.0912 | | 0.0912 | |
| 72 | | Investment properties..... | | | | | 0.0000 | | 0.0912 | | 0.0912 | |
| 73 | | Properties acquired in satisfaction of debt..... | | | | | 0.0000 | | 0.1337 | | 0.1337 | |
| 74 | | Total with real estate characteristics (Sum of Lines 7G1 through 7G3) | | | | | XXX | | XXX | | XXX | |
| SECTION H | | | | | | | | | | | | |
| INVESTMENTS IN TAX CREDIT STRUCTURES | | | | | | | | | | | | |
| 751 | | Yield guaranteed state tax credit investments..... | | | | | 0.0003 | | 0.0006 | | 0.0010 | |
| 762 | | Qualifying federal tax credit investments..... | | | | | 0.0063 | | 0.0120 | | 0.0190 | |
| 773 | | Qualifying state tax credit investments..... | | | | | 0.0063 | | 0.0120 | | 0.0190 | |
| 784 | | Other tax credit investments..... | | | | | 0.0273 | | 0.0600 | | 0.0975 | |
| 795 | | Total tax credit investments (Sum of Lines 75-H1 through 78H4) | | | | | XXX | | XXX | | XXX | |
| SECTION I | | | | | | | | | | | | |
| RESIDUAL TRanches OR INTERESTS | | | | | | | | | | | | |
| 801 | | Bonds – unaffiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 812 | | Bonds – affiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 823 | | Common stock – unaffiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 834 | | Common stock – affiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 845 | | Preferred stock – unaffiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 856 | | Preferred stock – affiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 867 | | Real estate – unaffiliated..... | | | | | 0.0000 | | 0.1580 | | 0.1580 | |
| 878 | | Real estate – affiliated..... | | | | | 0.0000 | | 0.1580 | | 0.1580 | |
| 889 | | Mortgage loans – unaffiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 8910 | | Mortgage loans – affiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 9011 | | Other – unaffiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 9112 | | Other – affiliated..... | | XXX | XXX | | 0.0000 | | 0.1580 | | 0.1580 | |
| 9213 | | Total residual tranches or interests (Sum of Lines 80-I1 through 91I12) | | | | | XXX | | XXX | | XXX | |
| SECTION J | | | | | | | | | | | | |
| SURPLUS NOTES AND CAPITAL NOTES | | | | | | | | | | | | |
| 93 | 1 | Highest quality..... | | XXX | XXX | | 0.0005 | | 0.0016 | | 0.0033 | |
| 94 | 2 | High quality..... | | XXX | XXX | | 0.0021 | | 0.0064 | | 0.0106 | |
| 95 | 3 | Medium quality..... | | XXX | XXX | | 0.0099 | | 0.0263 | | 0.0376 | |
| 96 | 4 | Low quality..... | | XXX | XXX | | 0.0245 | | 0.0572 | | 0.0817 | |
| 97 | 5 | Lower quality..... | | XXX | XXX | | 0.0630 | | 0.1128 | | 0.1880 | |
| 98 | 6 | In or near default..... | | XXX | XXX | | 0.0000 | | 0.2370 | | 0.2370 | |
| 99 | | Total surplus notes and capital notes (Sum of Lines 93-J1 through 98J6) | | XXX | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| SECTION K | | COLLATERAL LOANS | | | | | | | | | |
|-----------------|--|--|-----|-----|--------|--------|--------|--|--|--|--|
| 1 | | Backed by mortgage loans – collateral loans – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 2 | | Backed by mortgage loans – collateral loans – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 3 | | Backed by joint ventures, partnerships, & limited liability companies – collateral loans – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 4 | | Backed by joint ventures, partnerships, & limited liability companies – collateral loans – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 5 | | Backed by residual tranches or interests – collateral loans – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 6 | | Backed by residual tranches or interests – collateral loans – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 7 | | Backed by debt securities – collateral loans – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 8 | | Backed by debt securities – collateral loans – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 9 | | Backed by real estate – collateral loans – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 10 | | Backed by real estate – collateral loans – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 11 | | Collateral loans – all other – unaffiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 12 | | Collateral loans – all other – affiliated | XXX | XXX | 0.0000 | 0.0680 | 0.0680 | | | | |
| 13 | | Total collateral loans (Sum of Lines K1 through K12) | XXX | XXX | XXX | XXX | XXX | | | | |
| SECTION L | | ALL OTHER INVESTMENTS | | | | | | | | | |
| 1100 | | NAIC 1 working capital finance investments | XXX | | 0.0000 | 0.0042 | 0.0042 | | | | |
| 2101 | | NAIC 2 working capital finance investments | XXX | | 0.0000 | 0.0137 | 0.0137 | | | | |
| 3102 | | Other invested assets - Schedule BA | XXX | | 0.0000 | 0.1580 | 0.1580 | | | | |
| 4103 | | Other short-term invested assets - Schedule DA | XXX | | 0.0000 | 0.1580 | 0.1580 | | | | |
| 5104 | | Total all other (Sum of Lines L100 through L4103) | XXX | | XXX | XXX | XXX | | | | |
| 6105 | | Total other invested assets - Schedules BA & DA (Sum of Lines 20, 37, 64, 70, 74, 79, 92, 99 and 104 C8, D8, E27E28, F6, G4, H5, I13, J7, and K13, and L5) | | | XXX | XXX | XXX | | | | |

- (a) Times the company's weighted average portfolio beta (Minimum .1215, Maximum .2431).
- (b) Determined using same factors and breakdowns used for directly owned real estate.
- (c) This will be the factor associated with the risk category determined in the company generated worksheet.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

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|--|--|
| <p style="text-align: right;">DATE: <u>12/10/2025</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Dale Bruggeman</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Ohio Department of Insurance</u></p> <p>ADDRESS: <u>50W. Town St., 3rd Fl., Ste. 300</u> <u>Columbus, OH 43215</u></p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2025-29BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] <i>***If Yes, complete question below***</i></p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [X] Deferred Date <u>3/5/2026</u> [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

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| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input checked="" type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026-2027 / 1st Quarter 2027-2028

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financials Note 5L – Restricted Assets for reporting funds withheld and modco arrangements.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to add restricted asset codes to Investment Schedule General Instructions for the recently adopted changes to reporting of funds withheld and modco arrangements. (SAPWG Ref #2025-27)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, HEALTH & TITLE**INVESTMENT SCHEDULES GENERAL INSTRUCTIONS****(Applies to all investment schedules)**

Restricted Asset Code: For the columns that disclose information regarding investments that are not under the exclusive control of the reporting entity, and also including assets loaned to others, the following codes should be used:

- LS – Loaned or leased to others
- RA – Subject to repurchase agreement
- RR – Subject to reverse repurchase agreement
- DR – Subject to dollar repurchase agreement
- DRR – Subject to dollar reverse repurchase agreement
- C – Pledged as collateral – excluding collateral pledged to FHLB
- CF – Pledged as collateral to FHLB (including assets backing funding agreements)
- DB – Pledged under an option agreement
- DBP – Pledged under an option agreement involving “asset transfers with put options”
- R – Letter stock or otherwise restricted as to sale – excluding FHLB capital stock
(Note: Private placements are not to be included unless specific restrictions as to sale are included as part of the security agreement.)
- RF – FHLB capital stock
- SD – Pledged on deposit with state or other regulatory body
- M – Not under the exclusive control of the reporting entity for multiple reasons
- SS – Short sale of a security
- CX – Collateral assets received and on the balance sheet, excluding collateral held under security lending and repurchase agreements reported on the balance sheet
- MR – Assets held under modco reinsurance agreements
- FWR – Assets held under funds withheld reinsurance agreements
- O – Other

QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, HEALTH & TITLE**INVESTMENT SCHEDULES GENERAL INSTRUCTIONS****(Applies to all investment schedules)**

Restricted Asset Code: For the Columns that disclose information regarding investments that are not under the exclusive control of the reporting entity, and also including assets loaned to others, the following codes should be used:

| | | |
|------------|---|--|
| LS | – | Loaned or leased to others |
| RA | – | Subject to repurchase agreement |
| RR | – | Subject to reverse repurchase agreement |
| DR | – | Subject to dollar repurchase agreement |
| DRR | – | Subject to dollar reverse repurchase agreement |
| C | – | Pledged as collateral – excluding collateral pledged to FHLB |
| CF | – | Pledged as collateral to FHLB (including assets backing funding agreements) |
| DB | – | Placed under an option agreement |
| DBP | – | Placed under an option agreement involving “asset transfers with put options” |
| R | – | Letter stock or otherwise restricted as to sale – excluding FHLB capital stock |
| | | (Note: Private placements are not to be included unless specific restrictions as to sale are included as part of the security agreement) |
| RF | – | FHLB capital stock |
| SD | – | Placed on deposit with state or other regulatory body |
| M | – | Not under the exclusive control of the insurer for multiple reasons |
| SS | – | Short sale of a security |
| <u>CX</u> | – | <u>Collateral assets received and on the balance sheet, excluding collateral held under security lending and repurchase agreements reported on the balance sheet</u> |
| <u>MR</u> | – | <u>Assets held under modco reinsurance agreements</u> |
| <u>FWR</u> | – | <u>Assets held under funds withheld reinsurance agreements</u> |
| O | – | Other |

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

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| <p style="text-align: right;">DATE: <u>1/27/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-01BWG</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting [X]</p> <p>New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X]</p> <p>Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment</p> <p>[] Referred To Another NAIC Group</p> <p>[X] Received For Public Comment</p> <p>[] Adopted Date _____</p> <p>[] Rejected Date _____</p> <p>[] Deferred Date _____</p> <p>[] Other (Specify) _____</p> |
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BLANK(S) TO WHICH PROPOSAL APPLIES

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| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financials Note 26 – Intercompany Pooling Arrangements to add instructions for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to provide clarification to Note 26 for the change adopted in *SSAP No. 63—Underwriting Pools*. (SAPWG Ref #2022-12)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, & HEALTH**NOTES TO FINANCIAL STATEMENTS****Note 26 - Intercompany Pooling Arrangements**

Disclose information relating to intercompany pooling arrangements. Refer to *SSAP No. 63—Underwriting Pools* for accounting guidance.

Note 26 – Instruction:

If the reporting entity is part of a group of affiliated entities that utilizes a pooling arrangement that affects the solvency and integrity of the reporting entity's reserves under which the pool participants cede substantially all of their direct and assumed business to the pool, describe the basic terms of such arrangement(s) and the related accounting. The disclosure should include:

- A. Identification of the lead entity and of all affiliated entities participating in the intercompany pool (include NAIC Company Codes) and indication of their respective percentage shares of the pooled business.
- B. Description of the lines and types of business subject to the pooling agreement.
- C. Description of cessions to non-affiliated reinsurers of business subject to the pooling agreement, and indication of whether such cessions were prior to or subsequent to the cession of pooled business from the affiliated pool members to the lead entity.
- D. Identification of all pool members that are parties to reinsurance agreements with non-affiliated reinsurers covering business subject to the pooling agreement and that have a contractual right of direct recovery from the non-affiliated reinsurer per the terms of such reinsurance agreements.
- E. Explanation of any discrepancies between entries regarding pooled business on the assumed and ceded reinsurance schedules of the lead entity and corresponding entries on the assumed and ceded reinsurance schedules of other pool participants.
- F. Description of intercompany sharing, if other than in accordance with the pool participation percentage, and the write-off of uncollectible reinsurance.
- G. Amounts due to/from the lead entity and all affiliated entities participating in the intercompany pool as of the balance sheet date.
- H. The statement value and fair value of assets received or transferred by the reporting entity for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value.

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
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| <p style="text-align: right;">DATE: <u>2/6/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-02BWG MOD</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting [X]</p> <p>New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X]</p> <p>Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment</p> <p>[] Referred To Another NAIC Group</p> <p>[X] Received For Public Comment</p> <p>[] Adopted Date _____</p> <p>[] Rejected Date _____</p> <p>[] Deferred Date _____</p> <p>[] Other (Specify) _____</p> |
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BLANK(S) TO WHICH PROPOSAL APPLIES

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| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financials Note 11 – Debt to add a crosschecks between Note 11B – FHLB Agreements and General Interrogatory #26. Update footnote instructions for Life/Fraternal Exhibit 7 and Separate Account Exhibit

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to provide a crosscheck comparison between Note 11 and General Interrogatories to ensure these two places tie within the annual statement.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH & TITLE

NOTES TO FINANCIAL STATEMENTS



Detail Eliminated To Conserve Space

Note 11 – Debt

Note 11B – Instruction:

B. For FHLB (Federal Home Loan Bank) agreements, the following information shall be disclosed for the current year and prior year-end. (The information in the disclosures shall be presented gross even if a right to offset per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities* exists.)

(4) Borrowing from FHLB

a. Aggregate amount of borrowings from the FHLB, reflecting compilation of all advances, loans, funding agreements, repurchase agreements, securities lending, etc., outstanding with the FHLB, and classify whether the borrowing is in substance:

- Debt (*SSAP No. 15—Debt and Holding Company Obligations*)
- A funding agreement (*SSAP No. 52—Deposit-Type Contracts*)
- Other
- Aggregate Total

For funding agreements, report the total reserves established before reinsurance and calculated in accordance with *SSAP No. 52*.

Note 11B – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE (LINES 2 THROUGH 4) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

B. FHLB (Federal Home Loan Bank) Agreements



Detail Eliminated To Conserve Space

(2) FHLB Capital Stock

a. Aggregate Totals

| | |
|---------------------------------|-------|
| | Total |
| 1. Current Year | |
| (a) Membership Stock – Class A | |
| (b) Membership Stock – Class B | |
| (c) Activity Stock | |
| (d) Excess Stock | |
| (e) Aggregate Total (a+b+c+d) * | |

| | |
|---|-------|
| | Total |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | |
| 2. Prior Year-End | |
| (a) Membership Stock – Class A | |
| (b) Membership Stock – Class B | |
| (c) Activity Stock | |
| (d) Excess Stock | |
| (e) Aggregate Total (a+b+c+d) | |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | |

11B(2)a1(f) should be equal to or greater than 11B(4)a1(d)

11B(2)a2(f) should be equal to or greater than 11B(4)a2(d)

* 11B(2)a1(e) should be equal to General Interrogatory Part 1, Line 26.27



Detail Eliminated To Conserve Space

(3) Collateral Pledged to FHLB

a. Amount Pledged as of Reporting Date

| | 1 | 2 | 3 |
|--|------------|----------------|---------------------------|
| | Fair Value | Carrying Value | Aggregate Total Borrowing |
| 1. Current Year Total Collateral Pledged* | | | |
| 2. Prior Year-End Total Collateral Pledged | | | |

11B(3)a1 (Column 2) should be equal to or less than 11B(3)b1 (Column 2)

11B(3)a2 (Column 2) should be equal to or less than 11B(3)b2 (Column 2)

* 11B(3)a1 (Column 2) should be equal to General Interrogatory Part 1, Line 26.31



Detail Eliminated To Conserve Space

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

NOTES TO FINANCIAL STATEMENTS



Detail Eliminated To Conserve Space

Note 11 – Debt

Note 11B – Instruction:

B. For FHLB (Federal Home Loan Bank) agreements, the following information shall be disclosed for the general account, separate account, and the total of the general and separate accounts for the current year and prior year-end. (The information in the disclosures shall be presented gross even if a right to offset per SSAP No. 64—*Offsetting and Netting of Assets and Liabilities* exists.)

(4) Borrowing from FHLB

a. Aggregate amount of borrowings from the FHLB, reflecting compilation of all advances, loans, funding agreements, repurchase agreements, securities lending, etc., outstanding with the FHLB, and classify whether the borrowing is in substance:

- Debt (SSAP No. 15—*Debt and Holding Company Obligations*)
- A funding agreement (SSAP No. 52—*Deposit-Type Contracts*)
- Other
- Aggregate Total

For funding agreements, report the total reserves established before reinsurance and calculated in accordance with SSAP No. 52.



Detail Eliminated To Conserve Space

Note 11B – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE (LINES 2 THROUGH 4) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

B. FHLB (Federal Home Loan Bank) Agreements



Detail Eliminated To Conserve Space

(2) FHLB Capital Stock

a. Aggregate Totals

| | 1 Total 2+3 | 2 General Account | 3 Separate Accounts |
|--|-------------------|-------------------------|---------------------------|
| 1. Current Year | | | |
| (a) Membership Stock – Class A | | | |
| (b) Membership Stock – Class B | | | |
| (c) Activity Stock | | | |
| (d) Excess Stock | | | |
| (e) Aggregate Total (a+b+c+d)* | | | |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | | XXX | XXX |
| 2. Prior Year-end | | | |
| (a) Membership Stock – Class A | | | |
| (b) Membership Stock – Class B | | | |
| (c) Activity Stock | | | |
| (d) Excess Stock | | | |
| (e) Aggregate Total (a+b+c+d) | | | |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | | XXX | XXX |

11B(2)a1(f) should be equal to or greater than 11B(4)a1(d)

11B(2)a2(f) should be equal to or greater than 11B(4)a2(d)

* 11B(2)a1(e) (Column 2) should be equal to General Interrogatory Part 1, Line 26.27



Detail Eliminated To Conserve Space

(3) Collateral Pledged to FHLB

a. Amount Pledged as of Reporting Date

| | 1 Fair Value | 2 Carrying Value | 3 Aggregate Total Borrowing |
|--|-----------------|---------------------|-----------------------------------|
| 1. Current Year Total General and Separate Accounts Total Collateral Pledged (Lines 2+3) | | | |
| 2. Current Year General Account Total Collateral Pledged* | | | |
| 3. Current Year Separate Accounts Total Collateral Pledged | | | |
| 4. Prior Year-end Total General and Separate Accounts Total Collateral Pledged | | | |

11B(3)a1 (Column 2) should be equal to or less than 11B(3)b1 (Column 2)

11B(3)a2 (Column 2) should be equal to or less than 11B(3)b2 (Column 2)

11B(3)a3 (Column 2) should be equal to or less than 11B(3)b3 (Column 2)

11B(3)a4 (Column 2) should be equal to or less than 11B(3)b4 (Column 2)

* 11B(3)a2 (Column 2) should be equal to General Interrogatory Part 1, Line 26.31



Detail Eliminated To Conserve Space

(4) Borrowing from FHLB

a. Amount as of the Reporting Date

| | 1 Total 2+3 | 2 General Account | 3 Separate Account | 4 Funding Agreements Reserves Established |
|-----------------------------|-------------------|-------------------------|--------------------------|---|
| 1. Current Year | | | | |
| (a) Debt | | | | XXX |
| (b) Funding Agreements_* | | | | |
| (c) Other | | | | XXX |
| (d) Aggregate Total (a+b+c) | | | | |
| 2. Prior Year-end | | | | |
| (a) Debt | | | | XXX |
| (b) Funding Agreements | | | | |
| (c) Other | | | | XXX |
| (d) Aggregate Total (a+b+c) | | | | |

~~* 11B(4)a1(b) (Column 2) should be equal to Exhibit 7 Footnote (a), Line 6~~



Detail Eliminated To Conserve Space

EXHIBIT 7 – DEPOSIT-TYPE CONTRACTS

This exhibit is intended to capture information about the activity, before and after any reinsurance, for deposit-type contracts. Include supplementary contracts without life contingencies, annuities certain, income settlement options, premium, and deposit funds, and other contracts as defined in *SSAP No. 52—Deposit-Type Contracts*.

↓ **=====
↑** **Detail Eliminated To Conserve Space** **=====
↓** **↑**

Footnote (a): Amounts reported shall reflect the liability established for FHLB funding agreements reported in the General Account – (captured as part of Line 3 on the Liability page). Amount reported shall also be captured in Note 11B(4)a1(b) (Column 4). The total amount reported in the 11B Note shall agree to the amount reported for FHLB funding agreements reported as deposit-type contracts in both the General and Separate Account.

ANNUAL STATEMENT INSTRUCTIONS – SEPARATE ACCOUNT

EXHIBIT 4 – DEPOSIT-TYPE CONTRACTS

This exhibit is intended to capture information about the activity for deposit-type contracts as defined in *SSAP No. 52—Deposit-Type Contracts*.

↓ **====** **Detail Eliminated To Conserve Space** **====** ↓

Footnote (a): Amounts reported shall reflect the liability established for FHLB funding agreements reported in the Separate Account – (captured as part of Line 2 on the Liability page). Amount reported shall also be captured in General Account Note 11B(4)a1(b) (Column 4). The total amount reported in the 11B Note shall agree to the amount reported for FHLB funding agreements reported as deposit-type contracts in both the General and Separate Account.

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY/CASUALTY

NOTES TO FINANCIAL STATEMENTS



Detail Eliminated To Conserve Space

Note 11 – Debt

Note 11B – Instruction:

B. For FHLB (Federal Home Loan Bank) agreements, the following information shall be disclosed for the general account, protected cell account, and the total of the general and protected cell accounts for the current year and prior year-end. (The information in the disclosures shall be presented gross even if a right to offset per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities* exists.)

(4) Borrowing from FHLB

a. Aggregate amount of borrowings from the FHLB, reflecting compilation of all advances, loans, funding agreements, repurchase agreements, securities lending, etc., outstanding with the FHLB, and classify whether the borrowing is in substance:

- Debt (*SSAP No. 15—Debt and Holding Company Obligations*)
- A funding agreement (*SSAP No. 52—Deposit-Type Contracts*)
- Other
- Aggregate Total

For funding agreements, report the total reserves established before reinsurance and calculated in accordance with *SSAP No. 52*.

Note 11B – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE (LINES 2 THROUGH 4) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

B. FHLB (Federal Home Loan Bank) Agreements



Detail Eliminated To Conserve Space

(2) FHLB Capital Stock

a. Aggregate Totals

| | 1 Total 2+3 | 2 General Account | 3 Protected Cell Accounts |
|--|-------------------|-------------------------|---------------------------------|
| 1. Current Year | | | |
| (a) Membership Stock – Class A | | | |
| (b) Membership Stock – Class B | | | |
| (c) Activity Stock | | | |
| (d) Excess Stock | | | |
| (e) Aggregate Total (a+b+c+d) * | | | |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | | XXX | XXX |
| 2. Prior Year-end | | | |
| (a) Membership Stock – Class A | | | |
| (b) Membership Stock – Class B | | | |
| (c) Activity Stock | | | |
| (d) Excess Stock | | | |
| (e) Aggregate Total (a+b+c+d) | | | |
| (f) Actual or Estimated Borrowing Capacity as Determined by the Insurer | | XXX | XXX |

11B(2)a1(f) should be equal to or greater than 11B(4)a1(d)

11B(2)a2(f) should be equal to or greater than 11B(4)a2(d)

* 11B(2)a1(e) (Column 2) should be equal to General Interrogatory Part 1, Line 26.27



(3) Collateral Pledged to FHLB

a. Amount Pledged as of Reporting Date

| 1 | 2 | 3 |
|------------|----------------|------------------------------|
| Fair Value | Carrying Value | Aggregate Total Borrowing |

| | | | | |
|----|---|-------|--|-------|
| 1. | Current Year Total General and Protected Cell Accounts Total Collateral Pledged (Lines 2+3) | | | |
| 2. | Current Year General Account Total Collateral Pledged* | | | |
| 3. | Current Year Protected Cell Accounts Total Collateral Pledged | | | |
| 4. | Prior Year-end Total General and Protected Cell Accounts Total Collateral Pledged | | | |

11B(3)a1 (Column 2) should be equal to or less than 11B(3)b1 (Column 2)

11B(3)a2 (Column 2) should be equal to or less than 11B(3)b2 (Column 2)

11B(3)a3 (Column 2) should be equal to or less than 11B(3)b3 (Column 2)

11B(3)a4 (Column 2) should be equal to or less than 11B(3)b4 (Column 2)

* 11B(3)a2 (Column 2) should be equal to General Interrogatory Part 1, Line 26.31

ANNUAL STATEMENT BLANKS – SEPARATE ACCOUNT

EXHIBIT 4 – DEPOSIT-TYPE CONTRACTS

| | 1 Total | 2 Guaranteed Interest Contracts | 3 Annuities Certain | 4 Supplemental Contracts | 5 Dividend Accumulations or Refunds | 6 Premium and Other Deposit Funds |
|--|------------|--|---------------------------|--------------------------------|--|--|
| 1. Balance at the beginning of the year..... | | | | | | |
| 2. Deposits received during the year..... | | | | | | |
| 3. Investment earnings credited to account | | | | | | |
| 4. Other net change in reserves | | | | | | |
| 5. Fees and other charges assessed | | | | | | |
| 6. Surrender charges | | | | | | |
| 7. Net surrender or withdrawal payments..... | | | | | | |
| 8. Other net transfer to or (from) general account..... | | | | | | |
| 9. Balance at the end of current year (Lines 1+2+3+4-5-6-7-8) ^(a) | | | | | | |

(a) FHLB funding agreements:

| | |
|--|----|
| 1. Reported as GICs (captured in column 2)..... | \$ |
| 2. Reported as annuities certain (captured in column 3) | \$ |
| 3. Reported as supplemental contracts (captured in column 4) | \$ |
| 4. Reported as dividend accumulations or refunds (captured in column 5) | \$ |
| 5. Reported as premium or other deposit funds (captured in column 6) | \$ |
| 6. Total reported as deposit-type contracts (captured in column 1): (Sum of Lines 1 through 5) | \$ |

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | | | |
|---|--|--|--|
| DATE: <u>2/6/2026</u> | | FOR NAIC USE ONLY | |
| CONTACT PERSON: <u>Amy Fitzpatrick</u> | | Agenda Item # <u>2026-03BVG MOD</u> | |
| TELEPHONE: <u>816-783-8837</u> | | Year <u>2026</u> | |
| EMAIL ADDRESS: <u>afitzpatrick@naic.org</u> | | Changes to Existing Reporting <input type="checkbox"/> [X] | |
| ON BEHALF OF: <u>Life Actuarial (A) Task Force</u> | | New Reporting Requirement <input type="checkbox"/> [] | |
| NAME: <u>Rachel Hemphill, Chair</u> | | REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT | |
| TITLE: <u>Life Chief Actuary</u> | | No Impact <input type="checkbox"/> [X] | |
| AFFILIATION: <u>Texas Department of Insurance</u> | | Modifies Required Disclosure <input type="checkbox"/> [] | |
| ADDRESS: <u>P.O. Box 12030</u> | | Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No] | |
| <u>Austin, TX 78711-2030</u> | | ***If Yes, complete question below*** | |
| | | DISPOSITION | |
| | | <input type="checkbox"/> [] Rejected For Public Comment | |
| | | <input type="checkbox"/> [] Referred To Another NAIC Group | |
| | | <input checked="" type="checkbox"/> [X] Received For Public Comment | |
| | | <input type="checkbox"/> [] Adopted Date _____ | |
| | | <input type="checkbox"/> [] Rejected Date _____ | |
| | | <input type="checkbox"/> [] Deferred Date _____ | |
| | | <input type="checkbox"/> [] Other (Specify) _____ | |

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input type="checkbox"/> [X] INSTRUCTIONS | <input checked="" type="checkbox"/> [X] CROSSCHECKS |
| <input checked="" type="checkbox"/> [X] QUARTERLY STATEMENT | <input checked="" type="checkbox"/> [X] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> [X] Separate Accounts | <input checked="" type="checkbox"/> [X] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input checked="" type="checkbox"/> [X] Health | <input checked="" type="checkbox"/> [X] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026 / Quarterly 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the Life/Fraternal Annual and Quarterly Blanks and Instructions (Exhibit 5, General Interrogatory lines 27.6 and 27.7, Supplemental Exhibits and Schedules, Variable Annuities Supplement) to clarify how companies should report valuation standards for VM-22 business. Add an annual supplement for VM-22 Reserve reporting.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

These changes allow regulators to review and analyze data regarding variable and non-variable annuities. The changes related to the implementation of VM-22, Requirements for principle-based reserves (PBR) for non-variable annuities will help regulators analyze the effectiveness of the framework and monitor the business written under the framework. Changes to the variable annuities supplement were made to enhance analysis as well as align with existing VM-20 Reserves Supplement and the new VM-22 Reserves Supplement.

Exhibit 5 clarifies how companies should report valuation standards for VM-22 business. An edit to the mortality tables section was identified during the VM-22 updates. The edit aligns the valuation tables listed in the Life Instructions with those identified in the Valuation Manual.

IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____
Other Comments: General Interrogatory line 27 is uniform for all statement types but the change only applies to Life/Fraternal.

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

EXHIBIT 5 – AGGREGATE RESERVES FOR LIFE CONTRACTS



Detail Eliminated To Conserve Space

Column 1 – Valuation Standard

State table of mortality, disability, etc. rate of interest; distinguish between: (1) net level premium, and (2) preliminary term, modified preliminary term and select and ultimate standards. Valuation assumptions for mortality, morbidity, and other contingencies, interest, and the valuation method should be indicated by years of issue. For annuities, indicate whether immediate, deferred, or both.

In describing the valuation assumptions and valuation methods, abbreviate as follows:

Mortality and Morbidity

- AEAmerican Experience Table.
- AM (5)American Men (Ultimate) Table.
- 41 CSOCommissioners 1941 Standard Ordinary Table.
- 41 STD IND1941 Standard Industrial Table.
- 41 STD INT1941 Standard Intermediate Table.
- 58 CSOCommissioners 1958 Standard Ordinary Table.
- 58 CETCommissioners 1958 Extended Term Table.
- 60 CSGCommissioners 1960 Standard Group Table.
- 61 CSI.....Commissioners 1961 Standard Industrial Table.
- 80 CSOCommissioners 1980 Standard Ordinary Table or any modification of such table adopted by the NAIC.
- 80 CETCommissioners 1980 Extended Term Table or any modification of such table adopted by the NAIC.
- 2001 CSOCommissioners 2001 Standard Ordinary Table or any modification of such table adopted by the NAIC.
- 2017 CSOCommissioners 2017 Standard Ordinary Table or any modification of such table adopted by the NAIC.
- 2017 CSGI.....Commissioners 2017 Standard Guaranteed Issue Table or any modification of such table adopted by the NAIC.



Detail Eliminated To Conserve Space

Valuation Method

- NLPNet Level Premium Reserve Method.
- CRVMCommissioners Reserve Valuations Method.
- NJ.....NJ Modified Reserve Method.

| | |
|----------------------|---|
| ILL..... | Illinois Modified Reserve Method. |
| CARVM | Commissioners Annuity Reserve Valuation Method. |
| MOD..... | Other Modified Reserve Method (e.g., CRVM graded into Net Level). |
| VM-20NPR..... | Net Premium Reserve Component of VM-20 Reserve. |
| VM-20DET/STO | Deterministic/Stochastic Reserve Component of VM-20 Reserve (Excess over Net Premium Reserve). |
| VM-22 <u>V</u> | Any CARVM Reserve Calculated Using Valuation Interest Rates Defined in Section VM-22- <u>V</u> of the <i>Valuation Manual</i> . |
| VM-22CSV | Cash surrender component of VM-22 reserve. |
| VM-22DET/STO | Deterministic/Stochastic Reserve Component Using Section VM-22 of the <i>Valuation Manual</i> . (Reported reserve excess over CSV. If there is no CSV, report the full reported reserve.) |



Detail Eliminated To Conserve Space

Annuities

For any annuity contracts valued using valuation interest rates defined in Section VM-22-V of the *Valuation Manual*, include the reserve for Jumbo and Non-Jumbo contracts on separate lines in 50 basis point valuation interest rate intervals.

For example, typical entries in Exhibit 5 might be:

1. 2012 IAR VM-22-V Jumbo 2% - 2.49%..... 2018 – 20XX
2. 2012 IAR VM-22-V Jumbo 2.5% - 2.99%..... 2018 – 20XX
3. 2012 IAR VM-22-V Non-Jumbo 2% - 2.49%..... 2018 – 20XX
4. 2012 IAR VM-22-V Non-Jumbo 2.5% - 2.99%..... 2018 – 20XX

VARIABLE ANNUITIES SUPPLEMENT VM-21 RESERVES SUPPLEMENT
PARTS 1, AND 2, and 3

This supplement is to be filed on or before April 1.

Complete this supplement for contracts and certificates subject to Section VM-21 of the Valuation Manual (VM-21) or AG 43. Part 1 and Part 2 provide information on the benefit base, account value, and reserve by type of guaranteed benefit. A separate chart Part 1 shall be prepared for individual contracts and Part 2 for group contracts with individual certificates. Part 3A and Part 3B of this supplement provides information on the reserves required to be calculated by VM-21 or AG 43. Part 3A and Part 3B are intended to aid regulators in the analysis of reserves broken down into various benefit categories for both the prior and current year.

VM-21 RESERVES SUPPLEMENT – PARTS 1 AND 2

Column 1 &
 Column 2 – Type of Guaranteed Benefit

For purposes of this supplement, a Guaranteed Death Benefit is defined in accordance with the term “Guaranteed Minimum Death Benefit” in VM-21, and a Guaranteed Living Benefit (GLB) is defined in accordance with the term “Variable Annuity Guaranteed Living Benefits” in VM-01.



Detail Eliminated To Conserve Space

VM-21 RESERVES SUPPLEMENT - PART 3A

Variable Annuity Reserves Valued According to VM-21 or AG 43 by Product Type

Part 3A of this Supplement breaks out, by product type, the prior year and current year reported reserves on a Post-Reinsurance-Ceded basis as defined in Section 3 of VM-21 and a Pre-Reinsurance-Ceded basis as defined in Section 5.

Section 3 of VM-21 requires that the Post-Reinsurance-Ceded Reserve be determined in aggregate. Each of the products reported in the lines should be determined as the sum of the policy reserves using the policy reserves determined following the allocation process of VM-21 Section 13. A similar process should be used for each of the Pre-Reinsurance-Ceded Reserves.

Columns 1 & 2 – Reported Reserves in Excess of Cash Surrender Value (CSV)

Provide the reported reserve in excess of the CSV, for the prior year and current year for each line item. Post-Reinsurance-Ceded Reserve is net of reinsurance ceded. Pre-Reinsurance-Ceded Reserve should be prior to any reinsurance ceded and include reinsurance assumed. Sections 3 and 5 in VM-21 further describe the required reserve and treatment of reinsurance. The reported reserve for the current year should reflect all contracts in force as of the end of the current year. The reported reserve for the prior year should reflect all contracts in force as of the end of the prior year.

For purposes of this supplement, a Guaranteed Living Benefit (GLB) is defined in VM-01.

Each contract/certificate shall be included in one and only one line for each pre-reinsurance-ceded and post-reinsurance ceded.

For purposes of this supplement, Variable Annuities (VAs) Without Guaranteed Living Benefits includes VAs Without Living or Death Benefits, as well as VAs with Death Benefits only.

For purposes of this supplement, the accumulation phase is the period during which the contract owner or certificate holder deposits purchase payments into the deferred annuity. This phase ends when the benefit base is locked in at the start of the withdrawal phase. The withdrawal phase is the period during which the contract owner or certificate holder locks in the benefit base and withdraws income from the deferred annuity.

VM-21 RESERVES SUPPLEMENT – PART 3B

Variable Annuity Reserves Valued According to VM-21 or AG 43 by Product Type

Part 3B of this Supplement provides details underlying the Current Year amounts shown in Part 3A.

Section A: Columns 1 through 6 are to be completed for all VM-21 reserves not determined using the Alternative Reserve Methodology described in Section 7 of VM-21.

Section B: Columns 7 through 9 are to be completed if the reserves in Column 8 (Alternative Methodology Reserves) are calculated according to Section 7 of VM-21.

Where the amounts to be reported are calculated on an aggregate basis (i.e., CTE70 (adjusted), CTE70 (best efforts) and the Additional Standard Projection Amount), use the methodology described in section 13 of VM-21 to allocate amounts to the product categories. The choice of reasonable risk metric for allocation may, but is not required to, vary between the columns. For example, if a company has a block of GMWBs and a block with simple GMDB only and they have a CDHS, an allocation based on reasonable risk metrics may allocate more of the CTE70 (adjusted) to the GMWB block, compared to CTE70 (best efforts).

Columns 1 & 7 – **Cash Surrender Value**

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Cash Surrender Value for each product type. The CSV is defined in VM-01 of the *Valuation Manual*.

Column 2 – **CTE70 (adjusted)**

Report the unfloored Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded CTE70 scenario reserves by product type using the required VM-21 “adjusted” methodology as described in VM-21 Section 4. Report the amount in excess of cash surrender value whether it is positive or negative; do not floor the amount at zero if it is negative.

Column 3 – **CTE70 (best efforts)**

Report the unfloored Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded CTE70 scenario reserves by product type using the required VM-21 “best efforts” methodology as described in VM-21 Section 4. Report the amount in excess of cash surrender value whether it is positive or negative; do not floor the amount at zero if it is negative.

Column 4 – **Additional Standard Projection Amount**

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Additional Standard Projection Amount for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Additional Standard Projection Amount is defined in Section 6 of VM-21.

Column 5 – Stochastic Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Stochastic Reserve for each product type. Report the amount in excess of cash surrender value whether it is positive or negative; do not floor the amount at zero if it is negative. The Stochastic Reserve calculation is defined in Section 4 of VM-21.

Columns 6 & 9 – Number of Contracts

Report the number of individual contracts and certificates in a group contract by product type and by the required VM-21 methodology as described in Section A and Section B above. The number of individual contracts and certificates in a group contract should be prior to any reinsurance ceded and include reinsurance assumed.

Column 8 – Alternative Method Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Alternative Method Reserve for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Alternative Method Reserve calculation is defined in Section 7 of VM-21.

VM-22 RESERVES SUPPLEMENT

This supplement is to be filed on or before April 1.

Non-Variable Annuity Reserves Valued According to VM-22 by Product Type

This Supplement provides information on the reserves required to be calculated by Section VM-22 of the *Valuation Manual*. This includes the Stochastic Reserve, Deterministic Reserve and reserve calculated as required under VM-A, VM-C, and VM-V, as applicable. Only business issued on or after Jan. 1, 2026, valued by the requirements of VM-22 should be reported in Part 1A and Part 1B. Part 1A and Part 1B are intended to aid regulators in the analysis of reserves as determined under Section VM-22 of the *Valuation Manual* for both the prior and current year.

This Supplement also provides information regarding business where VM-22 of the *Valuation Manual* is not required to be applied. Companies exempted from the requirements of Section VM-22 are not required to complete Part 1A or Part 1B of this Supplement but must complete Part 2 or Part 3 as applicable.

VM-22 RESERVES SUPPLEMENT – PART 1A

Non-Variable Annuity Reserves Valued According to VM-22 by Product Type

Only business issued on or after Jan. 1, 2026, valued by the requirements of VM-22 should be reported in Part 1A.

Part 1A of this Supplement breaks out, by product type, the prior year and current year reported reserves on a Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded basis as defined in Section 5 of Section VM-22 of the *Valuation Manual*.

Section VM-22 of the *Valuation Manual* requires that the Post-Reinsurance-Ceded Reserve be determined by the VM-22 Reserving Categories as defined in VM-22 Section 3. The groupings provided in the rows of this supplement are different than the groupings permitted for aggregation purposes under VM-22 requirements. Longevity reinsurance contracts should be reported in line 1.6. Each of the other products reported in the remaining lines should be determined as the sum of the policy reserves using the policy reserves determined following the allocation process of VM-22 Section 3. A similar process should be used for each of the pre-reinsurance-ceded reserves.

Columns 1 & 2 – Reported Reserves in Excess of Cash Surrender Value (CSV)

Provide the reported reserve in excess of the CSV, for the prior year and current year for each line item. Post-Reinsurance-Ceded is net of reinsurance ceded. Pre-Reinsurance-Ceded should be prior to any reinsurance ceded and include reinsurance assumed. Sections 3 and 5 in the *Valuation Manual* further describe the required reserve and treatment of reinsurance. The reported reserve for the current year should reflect all contracts in force as of the end of the current year. The reported reserve for the prior year should reflect all contracts in force as of the end of the prior year.

For purposes of this supplement, a Guaranteed Living Benefit (GLB) is defined in VM-01.

Each contract/certificate shall be included in one and only one line for each pre-reinsurance-ceded and post-reinsurance ceded.

Lines 1.3 and 3.3 – Individual Immediate and Deferred Income Annuities and Annuitizations

Include: Individual Single Premium Immediate Annuity contracts; Deferred Income Annuity contracts as defined in VM-01.

Fixed income payment streams resulting from the exercise of settlement options or base annuitizations (i.e., not as a result of exercising attached guaranteed living benefits) of host contracts issued.

Fixed income payment streams resulting from exercising guaranteed minimum income or withdrawal benefits upon the depletion of fund value for such contracts.

These lines may contain reserves from both the payout and accumulation reserve categories.

Lines 1.4 and 3.4 – Structured Settlements

Include: Structured Settlement Contracts in payout or deferred status.

Lines 1.5 and 3.5 – Pension Risk Transfer and Group Payout Annuities and Annuitizations

Include: Annuitizations under group annuity-type contracts. These lines may contain reserves from both the payout and accumulation reserve categories.

Lines 1.6 and 3.6 – Longevity Reinsurance

Include: These lines contain reserves from only the longevity reinsurance category.

Example 1:

A company has a block of individual fixed deferred annuity (FDA) contracts with guaranteed minimum withdrawal benefits and a block of individual single premium immediate annuity (SPIA) contracts.

- The company reports their reserves for the FDA contracts that have guaranteed withdrawal benefits and have either not elected to exercise them or have elected to exercise them with a positive fund value in lines 1.7 and 3.7.
- The company reports their reserves for the SPIA contracts in lines 1.3 and 3.3.
- FDA contracts with guaranteed withdrawal benefits where the fund value is zero should be reported in lines 1.3 and 3.3.

VM-22 RESERVES SUPPLEMENT – PART 1B**Non-Variable Annuity Reserves Valued According to VM-22 by Product Type**

Part 1B of this Supplement provides details underlying the amounts shown in Part 1A.

Section A: Columns 1 through 7 are to be completed if the reserves in Column 6 (SR) are calculated according to the stochastic reserve requirements of Section VM-22 of the *Valuation Manual*.

Section B: Columns 8 through 13 are to be completed if the reserves in Column 12 (DR) are calculated according to the deterministic reserve requirements of Section VM-22 of the *Valuation Manual*.

Section C: Columns 14 through 16 are to be completed only if the reserves in Column 15 (VM-A, VM-C, and VM-V Reserve) are calculated according to the requirements of Section VM-22 of the *Valuation Manual*.

Column 1 – Pre-Tax Interest Maintenance Reserve (PIMR)

Report the Pre-Tax Interest Maintenance Reserve for each product type.

Column 2, 10 & 16 – Cash Surrender Value

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Cash Surrender Value for each product type. The CSV is defined in VM-01 of the *Valuation Manual*.

Column 3 & 11 – Prescribed Projection Amount

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Prescribed Projection Amount by product type using the required VM-22 methodology as described in VM-22 Section 6.

Column 4 – CTE70 (adjusted)

Report the unfloored Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded CTE70 scenario reserves by product type using the required VM-22 “adjusted” methodology as described in VM-22 Section 4. Report the amount in excess of cash surrender value whether it is positive or negative; do not floor the amount at zero if it is negative.

Column 5 – CTE70 (best efforts)

Report the unfloored Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded CTE70 scenario reserves by product type using the required VM-22 “best efforts” methodology as described in VM-22 Section 4. Report the amount in excess of cash surrender value whether it is positive or negative; do not floor the amount at zero if it is negative.

Column 6 – Buffer Amount

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded buffer amount for each product type. The Buffer Amount is equal to the unfloored CTE70 (adjusted) minus unfloored CTE65 (adjusted) as defined in Section 6 in VM-22 of the *Valuation Manual*. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative.

Columns 7 & 13 – Additional Standard Projection Amount (ASPA)

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Additional Standard Projection Amount for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Additional Standard Projection Amount is defined in Section 6 in VM-22 of the *Valuation Manual*. If the company did not calculate an ASPA pursuant to VM-22 requirements, then these lines may be left blank.

Column 8 – Stochastic Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Stochastic Reserve for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Stochastic Reserve calculation is defined in Section 4 in VM-22 of the *Valuation Manual*.

Columns 9, 15 & 18 – Number of Contracts

Report the number of individual contracts or certificates in a group contract by product type and by the required VM-22 methodology as described in Section A, Section B and Section C above. The number of individual contracts or certificates in a group contract should be prior to any reinsurance ceded and include reinsurance assumed.

Column 12 – Buffer Amount

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded buffer amount for each product type. The Buffer Amount is equal to the unfloored DR minus unfloored scenario reserve calibrated to CTE65 as defined in Section 6 in VM-22 of the *Valuation Manual*. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative.

Column 14 – Deterministic Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Deterministic Reserve for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Deterministic Reserve calculation is defined in Section 4 in VM-22 of the *Valuation Manual*. Equal to the Unfloored CTE70 (adjusted) minus Unfloored CTE65 (adjusted).

Column 17 – VM-A, VM-C, and VM-V Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded reserve for each product type. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The reserve calculations are defined in VM-A, VM-C, and VM-V in VM-22 of the *Valuation Manual*.

Example:

A company has Accumulation and Payout business subject to VM-22. The company used the Single Scenario Test for their small block of simple payout contracts. Most of the Accumulation products did not pass the SET. The remaining Accumulation contracts consist of deferred annuities without guaranteed living benefits and these passed the SERT.

- The company completes Section A for contracts the company did not pass or elect to use the SST or SET.
- The unfloored CTE70 (adjusted) minus unfloored CTE65 (adjusted) is reported in Column 6.
- The company completes Section B for contracts that pass the SST.
- The unfloored DR minus unfloored scenario reserve calibrated to CTE65 is reported in Column 12.
- The company completes Section C for contracts that pass the SET.
- The reserves calculated in accordance with VM-A, VM-C, and VM-V are reported in Column 17.

VM-22 RESERVES SUPPLEMENT – PART 2**Non-Variable Annuity PBR Exemption**

This section of the Supplement should be completed by a company that was allowed a Non-Variable Annuity PBR Exemption by its state of domicile. Depending on state requirements, “allowed” may mean “granted”, “acknowledged”, “not rejected”, or similar language.

If a company was allowed a Non-Variable Annuity PBR Exemption by its state of domicile, the company must indicate the source of the Non-Variable Annuity PBR Exemption, which could be defined in a state statute, a state regulation or in the NAIC-adopted *Valuation Manual*. If the source of the Non-Variable Annuity PBR Exemption is not the NAIC-adopted *Valuation Manual*, the company must disclose the criteria of the state’s Non-Variable Annuity PBR Exemption that the company has met, and the company must disclose the minimum reserve requirements that are required by the state of domicile. If the minimum reserve requirements of the state of domicile are the same as those specified in the NAIC-adopted *Valuation Manual*, the company may indicate: “Same as NAIC VM”. If the criteria for the Non-Variable Annuity PBR Exemption is the same as or substantially similar to the NAIC-adopted *Valuation Manual*, the company must also disclose the calendar year that the Non-Variable Annuity PBR Exemption was filed with and allowed by its state of domicile. If that calendar year is prior to the year of the annual statement, then the company must confirm that they meet the criteria for an ongoing exemption.

Companies whose non-variable annuity business is exempted from the requirements of VM-22 pursuant to a Non-Variable Annuity PBR Exemption are not required to complete Part 1 of this VM-22 Supplement.

VM-22 RESERVES SUPPLEMENT – PART 3**Other Exclusions from Non-Variable Annuity PBR**

Questions 1 and 2 of this section of the Supplement should be completed by a company that has filed and been granted a Single State Exemption from the reserve requirements of VM-22 by its state of domicile pursuant to requirements similar to the optional Section 15 of the NAIC *Standard Valuation Law* (# 820). The response to question 2 should be “Yes” if the company has any business assumed that relates to issues outside the state of domicile.

Question 3 of this section of the Supplement should be completed by a company if all its non-variable annuity business is excluded from the requirements of VM-22 pursuant to Section II Subsection 2 of the *Valuation Manual*.

Companies responding “Yes” to question 1 are not required to complete Part 1 of this VM-22 Supplement if all of their non-variable annuity business was covered under the Single State Exemption.

Companies responding “Yes” to question 3 are not required to complete Part 1 of this VM-22 Supplement.

ANNUAL STATEMENT BLANKS – LIFE/FRATERNAL, HEALTH, PROPERTY, & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

INVESTMENT



Detail Eliminated To Conserve Space

- 27.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes [] No []
- 27.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A []
If no, attach a description with this statement.
- LINES 27.3 through 27.5 27.7: FOR LIFE/FRATERNAL REPORTING ENTITIES ONLY:
- 27.3 Does the reporting entity utilize derivatives to hedge variable annuity guarantees subject to fluctuations as a result of interest rate sensitivity? Yes [] No []
- 27.4 If the response to 27.3 is yes, does the reporting entity utilize:
 - 27.41 Special accounting provision of SSAP No. 108 Yes [] No []
 - 27.42 Permitted accounting practice Yes [] No []
 - 27.43 Other accounting guidance Yes [] No []
- 27.5 By responding yes to 27.41 regarding utilizing the special accounting provisions of SSAP No. 108, the reporting entity attests to the following:
 - The reporting entity has obtained explicit approval from the domiciliary state.
 - Hedging strategy subject to the special accounting provisions is consistent with the requirements of VM 21.
 - Actuarial certification has been obtained which indicates that the hedging strategy is incorporated within the establishment of VM 21 reserves and provides the impact of the hedging strategy within the Actuarial Guideline Conditional Tail Expectation Amount.
 - Financial Officer Certification has been obtained which indicates that the hedging strategy meets the definition of a Clearly Defined Hedging Strategy within VM 21 and that the Clearly Defined Hedging Strategy is the hedging strategy being used by the company in its actual day-to-day risk mitigation efforts.
- 27.6 Does the reporting entity utilize derivatives to hedge non-variable annuity guarantees subject to fluctuations as a result of interest rate sensitivity? Yes [] No []
- 27.7 If the response to 27.6 is yes, does the reporting entity utilize:
 - 27.71 Permitted accounting practice Yes [] No []
 - 27.72 Other accounting guidance Yes [] No []



Detail Eliminated To Conserve Space

ANNUAL STATEMENT BLANKS – LIFE/FRATERNAL

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

Detail Eliminated To Conserve Space

34. Will the VM-20 Reserves Supplement be filed with the state of domicile and the NAIC by March 1?

35. Will the VM-22 Reserves Supplement be filed with the state of domicile and the NAIC by March 1?

36. Will the Health Supplement be filed with the state of domicile and the NAIC by March 1?

37. Will the Market Conduct Annual Statement (MCAS) Premium Exhibit for Year be filed with appropriate jurisdictions and with the NAIC by March 1?

APRIL FILING

38. Will the confidential Regulatory Asset Adequacy Issues Summary (RAAIS) required by the Valuation Manual be filed with the state of domicile by April 1?

39. Will the Long-Term Care Experience Reporting Forms be filed with the state of domicile and the NAIC by April 1?

40. Will the Credit Insurance Experience Exhibit be filed with the state of domicile and the NAIC by April 1? (Not applicable to fraternal benefit societies)

41. Will the Accident and Health Policy Experience Exhibit be filed by April 1?

42. Will the Supplemental Health Care Exhibit (Parts 1 and 2) be filed with the state of domicile and the NAIC by April 1?

43. Will the confidential Actuarial Memorandum required by Actuarial Guideline XXXVIII 8D be filed with the state of domicile by April 30?

44. Will the Supplemental Term and Universal Life Insurance Reinsurance Exhibit be filed with the state of domicile and the NAIC by April 1?

45. Will the Variable Annuities VM-21 Reserves Supplement be filed with the state of domicile and the NAIC by April 1?

46. Will the confidential Executive Summary of the PBR Actuarial Report be filed with the state of domicile by April 1?

47. Will the confidential Life Summary of the PBR Actuarial Report be filed with the state of domicile by April 1?

48. Will the confidential Variable Annuities Summary of the PBR Actuarial Report be filed with the state of domicile by April 1?

AUGUST FILING

49. Will Management's Report of Internal Control Over Financial Reporting be filed with the state of domicile by August 1?

VM-21 RESERVES SUPPLEMENT

PART 3A – RESERVES ON A POST-REINSURANCE CEDED BASIS AS DEFINED IN SECTION 3 OF VM-21 AND A PRE-REINSURANCE CEDED BASIS AS DEFINED IN SECTION 5

| | <u>Prior Year</u> | <u>Current Year</u> |
|--|---|---|
| | <u>1</u> | <u>2</u> |
| | <u>Reported Reserve in Excess of Cash Surrender Value</u> | <u>Reported Reserve in Excess of Cash Surrender Value</u> |
| <u>1. Post-Reinsurance-Ceded Reserve</u> | | |
| <u>1.1 Variable Annuities</u> | | |
| a. <u>Without Guaranteed Living Benefits</u> | | |
| b. <u>With Guaranteed Minimum Accumulation Benefits</u> | | |
| c. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase</u> | | |
| d. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase</u> | | |
| <u>1.2 Index-Linked Variable Annuities</u> | | |
| a. <u>Without Guaranteed Living Benefits</u> | | |
| b. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase</u> | | |
| c. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase</u> | | |
| <u>1.3 Immediate Variable Annuities</u> | | |
| a. <u>With a Guaranteed Annuity Payout Floor</u> | | |
| <u>1.4 Aggregate Write-Ins for Other Products</u> | | |
| <u>2. Total Post-Reinsurance-Ceded Reserve (Sum of Lines 1.1 through 1.4)</u> | | |
| <u>3. Pre-Reinsurance-Ceded Reserve</u> | | |
| <u>3.1 Variable Annuities</u> | | |
| a. <u>Without Guaranteed Living Benefits</u> | | |
| b. <u>With Guaranteed Minimum Accumulation Benefits</u> | | |
| c. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase</u> | | |
| d. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase</u> | | |
| <u>3.2 Index-Linked Variable Annuities</u> | | |
| a. <u>Without Guaranteed Living Benefits</u> | | |
| b. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase</u> | | |
| c. <u>With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase</u> | | |
| <u>3.3 Immediate Variable Annuities</u> | | |
| a. <u>With a Guaranteed Annuity Payout Floor</u> | | |
| <u>3.4 Aggregate Write-Ins for Other Products</u> | | |
| <u>4. Total Pre-Reinsurance-Ceded Reserve (Sum of Lines 3.1 through 3.4)</u> | | |
| <u>5. Total Reserves Ceded (Line 4 minus Line 2)</u> | | |
| <u>DETAILS OF WRITE-INS</u> | | |
| <u>1.1001.</u> | | |
| <u>1.1002.</u> | | |
| <u>1.1003.</u> | | |
| <u>1.1098.</u> Summary of remaining write-ins for Line 1.4 from overflow page | | |
| <u>1.1099</u> Totals (Lines 1.1001 through 1.1003 plus 1.1098) (Line 1.4 above) | | |
| <u>3.1001.</u> | | |
| <u>3.1002.</u> | | |
| <u>3.1003.</u> | | |
| <u>3.1098.</u> Summary of remaining write-ins for Line 3.4 from overflow page | | |
| <u>3.1099</u> Totals (Lines 3.1001 through 3.1003 plus 3.1098) (Line 3.4 above) | | |

VM-21 RESERVES SUPPLEMENT

PART 3B – DETAILS UNDERLYING THE CURRENT YEAR AMOUNTS SHOWN IN PART 3A

| | Current Year | | | | | | | | |
|--|----------------------|------------------|----------------------|---------------------------------------|--------------------|---------------------|----------------------|----------------------------|---------------------|
| | SECTION A | | | | | | SECTION B | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| | Cash Surrender Value | CTE70 (adjusted) | CTE70 (best efforts) | Additional Standard Projection Amount | Stochastic Reserve | Number of Contracts | Cash Surrender Value | Alternative Method Reserve | Number of Contracts |
| 1. Post-Reinsurance-Ceded Reserve | | | | | | | | | |
| 1.1 Variable Annuities | | | | | | | | | |
| a. Without Guaranteed Living Benefits | | | | | | XXX | | | XXX |
| b. With Guaranteed Minimum Accumulation Benefits..... | | | | | | XXX | XXX | XXX | XXX |
| c. With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase | | | | | | XXX | XXX | XXX | XXX |
| d. With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase | | | | | | XXX | XXX | XXX | XXX |
| 1.2 Index-Linked Variable Annuities | | | | | | | | | |
| a. Without Guaranteed Living Benefits | | | | | | XXX | | | XXX |
| b. With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase | | | | | | XXX | XXX | XXX | XXX |
| c. With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase | | | | | | XXX | XXX | XXX | XXX |
| 1.3 Immediate Variable Annuities | | | | | | | | | |
| a. With a Guaranteed Annuity Payout Floor | | | | | | XXX | XXX | XXX | XXX |
| 1.4 Aggregate Write-Ins for Other Products | | | | | | XXX | | | XXX |
| 2. Total Post-Reinsurance-Ceded Reserve Components (Sum of Lines 1.1 through 1.4) | | | | | | XXX | | | XXX |
| 3. Pre-Reinsurance-Ceded Reserve | | | | | | | | | |
| 3.1 Variable Annuities | | | | | | | | | |
| a. Without Guaranteed Living Benefits | | | | | | | | | |
| b. With Guaranteed Minimum Accumulation Benefits..... | | | | | | | XXX | XXX | XXX |
| c. With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase | | | | | | | XXX | XXX | XXX |
| d. With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase | | | | | | | XXX | XXX | XXX |
| 3.2 Index-Linked Variable Annuities | | | | | | | | | |
| a. Without Guaranteed Living Benefits | | | | | | | | | |
| b. With Guaranteed Minimum Withdrawal, or Income, Benefits – Accumulation Phase | | | | | | | XXX | XXX | XXX |
| c. With Guaranteed Minimum Withdrawal, or Income, Benefits – Withdrawal Phase | | | | | | | XXX | XXX | XXX |
| 3.3 Immediate Variable Annuities | | | | | | | | | |
| a. With a Guaranteed Annuity Payout Floor | | | | | | | XXX | XXX | XXX |
| 3.4 Aggregate Write-Ins for Other Products | | | | | | | | | |
| 4. Total Pre-Reinsurance-Ceded Reserve Components (Sum of Lines 3.1 through 3.4) | | | | | | | | | |
| 5. Total Reserve Component Ceded (Line 4 minus Line 2) | | | | | | XXX | | | XXX |
| DETAILS OF WRITE-INS | | | | | | | | | |
| 1.1001 | | | | | | XXX | | | XXX |
| 1.1002 | | | | | | XXX | | | XXX |
| 1.1003 | | | | | | XXX | | | XXX |
| 1.1098. Summary of remaining write-ins for Line 1.4 from overflow page | | | | | | XXX | | | XXX |
| 1.1099 Totals (Lines 1.1001 through 1.1003 plus 1.1098) (Line 1.4 above) | | | | | | XXX | | | XXX |
| 3.1001 | | | | | | | | | |
| 3.1002 | | | | | | | | | |
| 3.1003 | | | | | | | | | |
| 3.1098. Summary of remaining write-ins for Line 3.4 from overflow page | | | | | | | | | |
| 3.1099 Totals (Lines 3.1001 through 3.1003 plus 3.1098) (Line 3.4 above) | | | | | | | | | |

VM-22 RESERVES SUPPLEMENT – PART 1A
Non-Variable Annuity Reserves Valued According to VM-22 by Product Type
 For The Year Ended December 31, 20____
 (To Be Filed by March 1)

| | Prior Year | Current Year |
|--|---|---|
| | <u>1</u> | <u>2</u> |
| | <u>Reported Reserve in Excess of Cash Surrender Value</u> | <u>Reported Reserve in Excess of Cash Surrender Value</u> |
| 1. Post-Reinsurance-Ceded Reserve¹ | | |
| 1.1. Fixed Annuities Deferred without Guaranteed Living Benefit | XXX | |
| 1.2. Indexed Annuities Deferred without Guaranteed Living Benefit | XXX | |
| 1.3. Individual Immediate and Deferred Income Annuities and Annuizations | XXX | |
| 1.4. Structured Settlements | XXX | |
| 1.5. Pension Risk Transfer and Group Payout Annuities and Annuizations .. | XXX | |
| 1.6. Longevity Reinsurance | XXX | |
| 1.7. Fixed Annuities Deferred – with Guaranteed Living Benefit | XXX | |
| 1.8. Indexed Annuities Deferred – with Guaranteed Living Benefit | XXX | |
| 1.9. Aggregate Write-Ins for Other Products | XXX | |
| 2. Total Post-Reinsurance-Ceded Reserve (Sum of Lines 1.1 through 1.9) | XXX | |
| 3. Pre-Reinsurance-Ceded Reserve | | |
| 3.1. Fixed Annuities Deferred without Guaranteed Living Benefit | XXX | |
| 3.2. Indexed Annuities Deferred without Guaranteed Living Benefit | XXX | |
| 3.3. Individual Immediate and Deferred Income Annuities and Annuizations | XXX | |
| 3.4. Structured Settlements | XXX | |
| 3.5. Pension Risk Transfer and Group Payout Annuities and Annuizations .. | XXX | |
| 3.6. Longevity Reinsurance | XXX | |
| 3.7. Fixed Annuities Deferred – with Guaranteed Living Benefit | XXX | |
| 3.8. Indexed Annuities Deferred – with Guaranteed Living Benefit | XXX | |
| 3.9. Aggregate Write-Ins for Other Products | XXX | |
| 4. Total Pre-Reinsurance-Ceded Reserve (Sum of Lines 3.1 through 3.9) | XXX | |
| 5. Total Reserves Ceded (Line 4 minus Line 2) | XXX | |
| DETAILS OF WRITE-INS | | |
| 1.901. | XXX | |
| 1.902. | XXX | |
| 1.903. | XXX | |
| 1.998. Summary of remaining write-ins for Line 1.9 from overflow page | XXX | |
| 1.999 Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above) | XXX | |
| 3.901. | XXX | |
| 3.902. | XXX | |
| 3.903. | XXX | |
| 3.998. Summary of remaining write-ins for Line 3.9 from overflow page | XXX | |
| 3.999 Totals (Lines 3.901 through 3.903 plus 3.998) (Line 3.9 above) | XXX | |

¹ The groupings provided in the rows of this supplement are different than the groupings permitted for aggregation purposes under VM-22 requirements

VM-22 RESERVES SUPPLEMENT – PART 1B

Non-Variable Annuity Reserves Valued According to VM-22 by Product Type Details Underlying the Current Year Amounts Shown in Part 1A

| | Current Year | | | | | | | | | | | | | | | | | |
|---|--|---------------------------------|---|--------------------------|---------------------------------|------------------------------------|---|----------------------------|-----------------------------|----------------------------------|--|-------------------------------------|--|----------------------------------|------------------------------|----------------------------------|---|------------------------------|
| | SECTION A | | | | | | | | | SECTION B | | | | | | SECTION C | | |
| | 1 Pre-Tax Interest Maintenance Reserve (PIMR) | 2 Cash Surrender Value | 3 Prescribed Projection Amount | 4 CTE70 (adjusted) | 5 CTE70 (best efforts) | 6 Buffer Amount ² | 7 Additional Standard Projection Amount | 8 Stochastic Reserve | 9 Number of Contracts | 10 Cash Surrender Value | 11 Prescribed Projection Amount | 12 Buffer Amount ³ | 13 Additional Standard Projection Amount | 14 Determinis- tic Reserve | 15 Number of Contracts | 16 Cash Surrender Value | 17 VM-A, VM-C, and VM-V Reserve | 18 Number of Contracts |
| 1. Post-Reinsurance-Ceded Reserve | | | | | | | | | | | | | | | | | | |
| 1.1. Fixed Annuities Deferred without Guaranteed Living Benefit..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.2. Indexed Annuities Deferred without Guaranteed Living Benefit..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.3. Individual Immediate and Deferred Income Annuities and Annuizations..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.4. Structured Settlements..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.5. Pension Risk Transfer and Group Payout Annuities and Annuizations..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.6. Longevity Reinsurance..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.7. Fixed Annuities Deferred – with Guaranteed Living Benefit..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.8. Indexed Annuities Deferred – with Guaranteed Living Benefit..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.9. Aggregate Write-Ins for Other Products | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 2. Total Post-Reinsurance-Ceded Reserve (Sum of Lines 1.1 through 1.9) | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 3. Pre-Reinsurance-Ceded Reserve | | | | | | | | | | | | | | | | | | |
| 3.1. Fixed Annuities Deferred without Guaranteed Living Benefit..... | | | | | | | | | | | | | | | | | | |
| 3.2. Indexed Annuities Deferred without Guaranteed Living Benefit..... | | | | | | | | | | | | | | | | | | |
| 3.3. Individual Immediate and Deferred Income Annuities and Annuizations..... | | | | | | | | | | | | | | | | | | |
| 3.4. Structured Settlements..... | | | | | | | | | | | | | | | | | | |
| 3.5. Pension Risk Transfer and Group Payout Annuities and Annuizations..... | | | | | | | | | | | | | | | | | | |
| 3.6. Longevity Reinsurance..... | | | | | | | | | | | | | | | | | | |
| 3.7. Fixed Annuities Deferred – with Guaranteed Living Benefit..... | | | | | | | | | | | | | | | | | | |
| 3.8. Indexed Annuities Deferred – with Guaranteed Living Benefit..... | | | | | | | | | | | | | | | | | | |
| 3.9. Aggregate Write-Ins for Other Products | | | | | | | | | | | | | | | | | | |
| 4. Total Pre-Reinsurance-Ceded Reserve (Sum of Lines 3.1 through 3.9) | | | | | | | | | | | | | | | | | | |
| 5. Total Reserves Ceded (Line 4 minus Line 2) | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| DETAILS OF WRITE-INS | | | | | | | | | | | | | | | | | | |
| 1.901..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.902..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.903..... | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.998. Summary of remaining write-ins for Line 1.9 from overflow page | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 1.999. Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above) | | | | | | | | XXX | | | | | | | XXX | | XXX | |
| 3.901..... | | | | | | | | | | | | | | | | | | |
| 3.902..... | | | | | | | | | | | | | | | | | | |
| 3.903..... | | | | | | | | | | | | | | | | | | |
| 3.998. Summary of remaining write-ins for Line 3.9 from overflow page | | | | | | | | | | | | | | | | | | |
| 3.999. Totals (Lines 3.901 through 3.903 plus 3.998) (Line 3.9 above) | | | | | | | | | | | | | | | | | | |

2 – Equal to the Unfloored CTE70 (adjusted) minus Unfloored CTE65 (adjusted)
3 – Equal to the Unfloored DR minus Unfloored scenario reserve calibrated to CTE65

VM-22 RESERVES SUPPLEMENT – PART 2
Non-Variable Annuity PBR Exemption

Non-Variable Annuity PBR Exemption as defined in the NAIC adopted Valuation Manual (VM)

1. Has the company filed and been granted a Non-Variable Annuity PBR Exemption from the reserve requirements of VM-22 of the Valuation Manual by their state of domicile? Yes No

2. If the response to Question 1 is "Yes", then check the source of the granted "Non-Variable Annuity PBR Exemption" definition? (Check either 2.1, 2.2 or 2.3)

2.1 NAIC Adopted VM

2.2 State Statute (SVL) Complete items "a" and "b", as appropriate.

a. Is the criteria in the State Statute (SVL) different from the NAIC adopted VM? Yes No

b. If the answer to "a" above is "Yes", provide the criteria the state has used to grant the Non-Variable Annuity PBR Exemption (e.g., Group/Legal Entity criteria) and the minimum reserve requirements that are required by the state of domicile (if the minimum reserve requirements are the same as the Adopted VM, write SAME AS NAIC VM):

.....
.....
.....
.....

2.3 State Regulation Complete items "a" and "b", as appropriate.

a. Is the criteria in the State Regulation different from the NAIC adopted VM? Yes No

b. If the answer to "a" above is "Yes", provide the criteria the state has used to grant the Non-Variable Annuity PBR Exemption (e.g., Group/Legal Entity criteria) and the minimum reserve requirements that are required by the state of domicile (if the minimum reserve requirements are the same as the Adopted VM, write SAME AS NAIC VM):

.....
.....
.....
.....

VM-22 RESERVES SUPPLEMENT – PART 3
Other Exclusions from Non-Variable Annuity PBR

| | |
|--|--|
| <u>1A. Has the company filed and been granted a Single State Exemption from the reserve requirements of VM-22 of the Valuation Manual by their state of domicile?</u> | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| <u>1B. If the answer to question 1A is "Yes" please discuss any business not covered under the Single State Exemption.</u> | |
| <hr/> <hr/> | |
| <u>2A. If the answer to question 1A is "Yes", does the company have risks for policies issued outside its state of domicile?</u> | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| <u>2B. If the answer to question 2A is "Yes" please discuss the risks for policies issued outside the state of domicile, how those risks came to be a responsibility of the company, and why the company would still be considered a Single State Company with such risks.</u> | |
| <hr/> <hr/> | |
| <u>3. Is all of the company's non-variable annuity business excluded from the requirements of VM-22 pursuant to Section II, Subsection 2 of the Valuation Manual?</u> | Yes <input type="checkbox"/> No <input type="checkbox"/> |

QUARTERLY STATEMENT BLANKS – LIFE/FRATERNAL

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of **NO** to the specific interrogatory will be accepted in lieu of filing a “NONE” report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter **SEE EXPLANATION** and provide an explanation following the interrogatory questions.

Response

- 1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?
- 2. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC with this statement?
- 3. Will the Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC?
- 4. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC?
- 5. Will the Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI be filed with the state of domicile and electronically with the NAIC?
- 6. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) be filed with the state of domicile and electronically with the NAIC?
- 7. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) be filed with the state of domicile and electronically with the NAIC?
- 8. Will the Life PBR Statement of Exemption be filed with the state of domicile by July 1st and electronically with the NAIC with the second quarterly filing per the Valuation Manual (by August 15)? (2nd Quarter Only) The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter. In the case of an ongoing statement of exemption, enter “SEE EXPLANATION” and provide as an explanation that the company is utilizing an ongoing statement of exemption.
- 9. Will the Annuity PBR Statement of Exemption be filed with the state of domicile by July 1st and electronically with the NAIC with the second quarterly filing per the Valuation Manual (by August 15)? (2nd Quarter Only) The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter. In the case of an ongoing statement of exemption, enter “SEE EXPLANATION” and provide as an explanation that the company is utilizing an ongoing statement of exemption.

AUGUST FILING

- 9.1 Will the regulator-only (non-public) Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile and electronically with the NAIC (as a regulator-only non-public document) by August 1? The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|---|---|
| <p style="text-align: right;">DATE: <u>2/20/2026</u></p> <p>CONTACT PERSON: <u>Tim Nauheimer</u></p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: <u>tnauheimer@naic.org</u></p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Robert Kasinow</u></p> <p>TITLE: <u>Chair</u></p> <p>AFFILIATION: <u>Macprudential (E) Working Group</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-04BWG MOD</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting [X]</p> <p>New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X]</p> <p>Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment</p> <p>[] Referred To Another NAIC Group</p> <p>[X] Received For Public Comment</p> <p>[] Adopted Date _____</p> <p>[] Rejected Date _____</p> <p>[] Deferred Date _____</p> <p>[] Other (Specify) _____</p> |
|---|---|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input checked="" type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Add a section to Notes to Financials Note 11 – Debt to disclose funding agreements backing special purpose vehicles (SPV) issuances (FABN). Also add a footnote to Life statement Exhibit 7 to report the amount of total funding agreements backed by SPV issuances.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was created to provide disclosures to monitor the activity in the FABN market in accordance with its financial stability monitoring objectives. This disclosure will provide the ability to identify transmission channels of potential risk to and from the insurance industry and the interconnectedness to the capital markets.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments: The SAPWG plans to present a Form A at the Spring NM and if that does not move forward, then Blanks will remove the exposure.

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, HEALTH, PROPERTY, & TITLE**Notes to Financial Statements****Detail Eliminated To Conserve Space****Note 11 - Debt**

***** Debt can include: Debt, FHLB Agreements, Unused commitments and lines of credit for financing arrangements, Funding Agreements - SPV Issuances *****

Note 11D – Instruction:

D. Disclose information on funding agreements issued by such reporting entity that support funding agreement backed special purpose vehicle (SPV) issuances. (This disclosure is required for all known instances, even in situations in which the SPV was not sponsored or formed by the reporting entity and when the relevant SPV is bankruptcy remote from the reporting entity.) The balance of funding agreements supporting funding agreement backed SPV issuances shall be reported before reinsurance.

(1) Balance of funding agreements per type of issuance, per type of issuance where the transaction contains a put feature or embedded option¹, per type of issuance where the terms of the SPV issuance differ from the terms of the corresponding funding agreement², and the BACV amount of collateral pledged by the reporting entity by type of transaction:

- a. Funding Agreement Backed Notes (FABN)
- b. Funding Agreement Backed Commercial Paper (FABCP)
- c. Funding Agreement Backed Repurchase Agreements (FABR)
- d. Funding Agreement Backed Loans (FABL)
- e. Funding Agreements Issued into Muni Prepay Structures
- f. Other Funding Agreements Backing SPV Issuances (Other)

(2) Please provide a narrative description for instances in which the SPV is sponsored or formed by the reporting entity and the terms (e.g., principal, interest rate, maturity, rating, or currency) of a funding agreement differ from the terms of the corresponding SPV issuance, identifying the different terms. (For example, if the funding agreement matures in 3 years, but the FABL matures in 3 months, instances of different interest rates, etc.)

- With respect to FABCP, please respond to this question by identifying instances in which the terms of an SPV issuance do not match the terms of a deposit made under an FABCP master funding agreement.
- With respect to funding agreements issued into muni prepay structures, no response is necessary given that the terms of the funding agreement are designed to be different from the SPV issuances.

¹ As used herein, a funding agreement is “Puttable” or contains a “put feature or embedded option” if such funding agreement contains a provision that allows a contract holder to withdraw from their account value at ~~book value~~ the amount specified in the issuance at any time, without being tied to a specific triggering event; under such provision, the insurer has no contractual alternatives to paying out at ~~book value~~ the amount specified in the issuance.

² Instances in which the terms of the funding agreement are designed to be different from the associated SPV issuances should be reported as an amount with different terms (even in instances where the SPV is not sponsored or formed by the reporting entity such as funding agreements issued into muni prepay structures).

- (3) Disclose the maturity distribution of funding agreements backing SPV issuances, separately identifying the funding agreements issued as fixed or floating interest rate prior to execution of any interest rate swaps.
- (4) Identify if the SPV issuances backed by funding agreements are issued in a non-U.S. currency. If so, disclose the currency denominations and whether all foreign currency exposure related to each currency denomination is hedged.
- (5) Is all foreign currency exposure related to funding agreements backing SPV issuances hedged via derivatives, asset matching, or otherwise mitigated? If not, please explain.

Note B11D – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE (LINES 1, 3, AND 4) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

D. Funding agreements issued by such reporting entity that support funding agreement backed special purpose vehicle (SPV) issuances:

(1) Funding Agreements Backing SPV Issuances

| | <u>1</u> Total Amount | <u>2</u> Amount Puttable | <u>3</u> Amount with Different Terms | <u>4</u> BACV of Collateral Pledged to SPV by Reporting Entity |
|--|-----------------------------|--------------------------------|--|---|
| a. <u>Funding Agreement Backed Notes (FABN)</u> | \$..... | \$..... | \$..... | \$..... |
| b. <u>Funding Agreement Backed Commercial Paper (FABCP)</u> | \$..... | \$..... | \$..... | \$..... |
| c. <u>Funding Agreement Backed Repurchase Agreements (FABR)</u> | \$..... | \$..... | \$..... | \$..... |
| d. <u>Funding Agreement Backed Loans (FABL)</u> | \$..... | \$..... | \$..... | \$..... |
| e. <u>Funding Agreements Issued into Muni Prepay Structures</u> | \$..... | \$..... | \$..... | \$..... |
| f. <u>Other Funding Agreements Backing SPV Issuances (Other)</u> | \$..... | \$..... | \$..... | \$..... |
| g. <u>Total (a+b+c+d+e+f)</u> | \$..... | \$..... | \$..... | \$..... |

Life Filers – 11D(1)g Column 1 should equal Exhibit 7 Footnote (b) Line 1

(3) Maturity Distribution of Funding Agreements Backing SPV Issuances

| | <u>1</u> Fixed Rate | <u>2</u> Floating Rate | <u>3</u> Total* |
|---|------------------------|---------------------------|--------------------|
| a. <u>1 year or Less</u> | \$..... | \$..... | \$..... |
| b. <u>After 1 year through 5 years</u> | \$..... | \$..... | \$..... |
| c. <u>After 5 years through 10 years</u> | \$..... | \$..... | \$..... |
| d. <u>After 10 years through 20 years</u> | \$..... | \$..... | \$..... |
| e. <u>Over 20 years</u> | \$..... | \$..... | \$..... |
| f. <u>Total (a+b+c+d+e)</u> | \$..... | \$..... | \$..... |

11D(3)f Column 3 should equal 11D(1)g Column 1

* Total should reflect the balance of all funding agreements backing SPV issuances reported as Deposit-Type Contracts. Include zero coupon funding agreements in the fixed rate column.

(4) Funding Agreements (FA) Backing SPV Issuances in Currency Denominations.

| | Funding Agreements Backing SPV Issuances (in USD) |
|---|--|
| a. <u>Year-End FA Balance</u> <u>(USD) Amount of FA Backing SPV</u> <u>Issuances in USA</u> | \$..... |
| b. <u>Amount of FA Backing SPV</u> <u>Issuances in Foreign Currency:</u> | |
| 1. <u>AUD</u> | \$..... |
| 2. <u>CAD</u> | \$..... |
| 3. <u>CHF</u> | \$..... |
| 4. <u>EUR</u> | \$..... |
| 5. <u>GBP</u> | \$..... |
| 6. <u>Other</u> | \$..... |
| 7. <u>Total Foreign Currency</u> | |
| <u>(1+2+3+4+5+6+7)</u> | \$..... |
| c. <u>Total FA Backing SPV Issuances</u> <u>(a+b7)</u> | \$..... |

11D(4)c should equal 11D(1)g Column 1

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

EXHIBIT 7 – DEPOSIT-TYPE CONTRACTS

This exhibit is intended to capture information about the activity, before and after any reinsurance, for deposit-type contracts. Include supplementary contracts without life contingencies, annuities certain, income settlement options, premium, and deposit funds, and other contracts as defined in *SSAP No. 52—Deposit-Type Contracts*.

**=====
↑ ↓** **Detail Eliminated To Conserve Space** **=====
↑ ↓**

Footnote (b): Amounts reported shall reflect the liability established for funding agreements that back special purpose vehicle (SPV) issuances reported in the General Account – (captured as part of Line 3 on the Liability page). Amount reported shall also be captured in Note 11D(1)g (Column 1). The total amount reported in the 11D Note shall agree to the amount reported for funding agreements that back SPV issuances reported as deposit-type contracts in both the General and Separate Account.

ANNUAL STATEMENT INSTRUCTIONS – SEPARATE ACCOUNT

EXHIBIT 4 – DEPOSIT-TYPE CONTRACTS

This exhibit is intended to capture information about the activity for deposit-type contracts as defined in *SSAP No. 52—Deposit-Type Contracts*.

↓ **====** **Detail Eliminated To Conserve Space** **====** ↓

Footnote (b): Amounts reported shall reflect the liability established for funding agreements that back special purpose vehicle (SPV) issuances reported in the Separate Account – (captured as part of Line 2 on the Liability page). Amount reported shall also be captured in General Account Note 11D(1)g (Column 1). The total amount reported in the 11D Note shall agree to the amount reported for funding agreements that back SPV issuances reported as deposit-type contracts in both the General and Separate Account.

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL

EXHIBIT 7 – DEPOSIT-TYPE CONTRACTS

| | 1 | 2 | 3 | 4 | 5 | 6 |
|--|-------|-------------------------------|-------------------|------------------------|-----------------------------------|---------------------------------|
| | Total | Guaranteed Interest Contracts | Annuities Certain | Supplemental Contracts | Dividend Accumulations or Refunds | Premium and Other Deposit Funds |
| 1. Balance at the beginning of the year before reinsurance | | | | | | |
| 2. Deposits received during the year | | | | | | |
| 3. Investment earnings credited to the account | | | | | | |
| 4. Other net change in reserves..... | | | | | | |
| 5. Fees and other charges assessed | | | | | | |
| 6. Surrender charges | | | | | | |
| 7. Net surrender or withdrawal payments | | | | | | |
| 8. Other net transfers to or (from) Separate Accounts | | | | | | |
| 9. Balance at the end of current year before reinsurance (Lines 1+2+3+4-5-6-7-8) ^{(a),(b)} .. | | | | | | |
| 10. Reinsurance balance at the beginning of the year | | | | | | |
| 11. Net change in reinsurance assumed | | | | | | |
| 12. Net change in reinsurance ceded | | | | | | |
| 13. Reinsurance balance at the end of the year (Lines 10+11-12) | | | | | | |
| 14. Net balance at the end of current year after reinsurance (Lines 9+13) | | | | | | |

- (a) FHLB funding agreements:
- 1. Reported as GICs (captured in column 2) \$
 - 2. Reported as annuities certain (captured in column 3)..... \$
 - 3. Reported as supplemental contracts (captured in column 4)
 - 4. Reported as dividend accumulations or refunds (captured in column 5).... \$
 - 5. Reported as premium or other deposit funds (captured in column 6)..... \$
 - 6. Total reported as deposit-type contracts (captured in column 1): (Sum of Lines 1 through 5)..... \$

- (b) Funding agreements that back special purpose vehicle (SPV) issuances:
- 1. Total across all categories (captured in column 1, line 9) \$
 - 2. Of the total in line (b)1, funding agreements that support funding agreement backed SPV issuances whereby the funding agreement contains a put feature or embedded option..... \$

ANNUAL STATEMENT BLANKS – SEPARATE ACCOUNT

EXHIBIT 4 – DEPOSIT–TYPE CONTRACTS

| | 1 | 2 | 3 | 4 | 5 | 6 |
|--|-------|-------------------------------|-------------------|------------------------|-----------------------------------|---------------------------------|
| | Total | Guaranteed Interest Contracts | Annuities Certain | Supplemental Contracts | Dividend Accumulations or Refunds | Premium and Other Deposit Funds |
| 1. Balance at the beginning of the year..... | | | | | | |
| 2. Deposits received during the year..... | | | | | | |
| 3. Investment earnings credited to account | | | | | | |
| 4. Other net change in reserves | | | | | | |
| 5. Fees and other charges assessed | | | | | | |
| 6. Surrender charges | | | | | | |
| 7. Net surrender or withdrawal payments..... | | | | | | |
| 8. Other net transfer to or (from) general account..... | | | | | | |
| 9. Balance at the end of current year (Lines 1+2+3+4-5-6-7-8) ^{(a) (b)} | | | | | | |

*****Drafting Note – Footnote (a) for FHLB was added in Proposal 2026-02BWG and was not shown here because it hasn't been adopted. If the footnote is adopted in Proposal 2026-02BWG and the new footnote that is shown here for FABN is adopted in this proposal then both footnotes will be added to the Separate Account Blank for Annual 2026. *****

(b) Funding agreements that back special purpose vehicle (SPV) issuances:

3. Total across all categories (captured in column 1, line 9)..... \$

4. Of the total in line (b)1, funding agreements that support funding agreement backed SPV issuances whereby the funding agreement contains a put feature or embedded option..... \$

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | | |
|---|------------------------|--|
| | DATE: <u>3/26/2026</u> | FOR NAIC USE ONLY |
| CONTACT PERSON: <u>Jim Pinegar</u> | | Agenda Item # <u>2026-05BWG</u> |
| TELEPHONE: _____ | | Year <u>2026</u> |
| EMAIL ADDRESS: <u>jpinegar@naic.org</u> | | Changes to Existing Reporting <input checked="" type="checkbox"/> [X] |
| ON BEHALF OF: _____ | | New Reporting Requirement <input type="checkbox"/> [] |
| NAME: <u>Carrie Mears</u> | | REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT |
| TITLE: <u>Chair - INVAWG</u> | | No Impact <input checked="" type="checkbox"/> [X] |
| AFFILIATION: <u>Iowa Insurance Division</u> | | Modifies Required Disclosure <input type="checkbox"/> [] |
| ADDRESS: <u>1963 Bell Ave</u> | | Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input checked="" type="checkbox"/> [Y] |
| <u>Des Moines, IA 50315</u> | | ***If Yes, complete question below*** |
| | | DISPOSITION |
| | | <input type="checkbox"/> [] Rejected For Public Comment |
| | | <input type="checkbox"/> [] Referred To Another NAIC Group |
| | | <input checked="" type="checkbox"/> [X] Received For Public Comment |
| | | <input type="checkbox"/> [] Adopted Date _____ |
| | | <input type="checkbox"/> [] Rejected Date _____ |
| | | <input type="checkbox"/> [] Deferred Date _____ |
| | | <input type="checkbox"/> [] Other (Specify) _____ |

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input type="checkbox"/> [] CROSSCHECKS |
| <input type="checkbox"/> [] QUARTERLY STATEMENT | <input type="checkbox"/> [] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> [X] Separate Accounts | <input checked="" type="checkbox"/> [X] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input checked="" type="checkbox"/> [X] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input checked="" type="checkbox"/> [X] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the instructions to require explicit identification of instances where NAV is used by requiring direct reporting, rather than inference through omission, in the *Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code* column in Schedules D and BA. The updates will also require completion of this column for all reported items and restrict reporting to indicators expressly permitted in the Annual Statement Instructions.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is twofold: (1) to require explicit identification of the fair value hierarchy used to obtain reported values, including clear designation of instances where NAV is utilized; and (2) to improve the completeness and consistency of reporting. Determination of fair value, particularly of Level 3 items, remains an area of significant regulatory interest, and clearer identification, along with fully completed reporting, will enhance transparency and support more efficient and effective regulatory oversight. Currently, these columns permit 'blank' reporting, requiring reference to another column that may also be incorrectly or incompletely completed. Determining fair value by inference or cross-checking multiple fields is not reliable and increases the risk of errors, delays, and resource-intensive reviews.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

While NAV information may be reported elsewhere in the Annual or Quarterly Statement, this proposal requires its inclusion in the *Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code* column to provide a single, consistent, and unambiguous location for this information. Explicit reporting in this column ensures that downstream analysis, cross-

checking, and regulatory review can be conducted efficiently without relying on inference or manual reconciliation from other schedules. It also standardizes reporting across all filers, reducing the risk of errors or omissions.

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

**** This section must be completed on all forms.**

Revised 11/17/2022

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, HEALTH, & TITLE

SCHEDULE D – PART 1- SECTION 1LONG-TERM BONDS – ISSUER CREDIT OBLIGATIONS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 25 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Report the fair value level that represents the inputs used to determine fair value. Whenever possible, the reported fair value shall reflect level 1 followed by level 2, and then level 3. In all situations fair value shall be determined in accordance with *SSAP No. 100—Fair Value*.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1”, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators for bonds to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity or a third party contracted by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, leave blank.

Column 26 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE D – PART 1 – SECTION 2**ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

Column 26 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Report the fair value level that represents the inputs used to determine fair value. Whenever possible, the reported fair value shall reflect level 1, followed by level 2, and then level 3. In all situations fair value shall be determined in accordance with *SSAP No. 100—Fair Value*.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators for bonds to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity or a third party contracted by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, leave blank.

Column 27 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE D – PART 2 – SECTION 1**PREFERRED STOCKS OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

Column 23 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the price at which the security could be sold, based on market information. Fair value should only be determined analytically when the market-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in SSAP No. 100—Fair Value allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1”, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators for preferred stocks to show the method used by the reporting entity to determine the Rate Per Share Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in SSAP No. 100—Fair Value allows the use of net asset value (NAV) per share instead of fair value for certain investments. If NAV is used instead of fair value, leave blank.

Column 24 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE D – PART 2 – SECTION 2**COMMON STOCKS OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

Column 21 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the price at which the security could be sold, based on market information. Fair value should only be determined analytically when the market-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in SSAP No. 100—Fair Value allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators for common stocks to show the method used by the reporting entity to determine the Rate Per Share Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

~~The guidance in SSAP No. 100—Fair Value allows the use of net asset value (NAV) per share instead of fair value for certain investments. If NAV is used instead of fair value, leave blank.~~

Column 22 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE DL – PART 1**SECURITIES LENDING COLLATERAL ASSETS**

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets reported in aggregate on Line 10 of the Asset page
(Line 9 for Separate Accounts) and not included on Schedules A, B, BA, D, DB, and E)

Detail Eliminated To Conserve Space

Column 10 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Report the fair value level that represents the inputs used to determine fair value. Whenever possible, the reported fair value shall reflect level 1, followed by level 2, and then level 3. In all situations fair value shall be determined in accordance with *SSAP No. 100—Fair Value*.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1”, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity or a third party contracted by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value leave blank.

Column 11 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE DL – PART 2**SECURITIES LENDING COLLATERAL ASSETS**

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB, and E
and not reported in aggregate on Line 10 of the Asset page (Line 9 for Separate Accounts))

Detail Eliminated To Conserve Space

Column 10 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Report the fair value level that represents the inputs used to determine fair value. Whenever possible, the reported fair value shall reflect level 1, followed by level 2, and then level 3. In all situations fair value shall be determined in accordance with *SSAP No.—100 Fair Value*.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1, “2”, “3”, or “n” is required in this column.

The following is a listing of the valid method indicators to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity or a third part contracted by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value leave blank.

Column 11 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

SCHEDULE BA – PARTS 1, 2 AND 3**OTHER LONG-TERM INVESTED ASSETS – GENERAL INSTRUCTIONS**

Detail Eliminated To Conserve Space

Column 22 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Report the fair value level that represents the inputs used to determine fair value. Whenever possible, the reported fair value shall reflect level 1, followed by level 2, and then level 3. In all situations fair value shall be determined in accordance with *SSAP No. 100—Fair Value*.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, show “n”.

A “1,” “2,” “3,” or “n” is required in this column.

The following is a listing of the valid method indicators to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued. (Reporting entities shall utilize source “c” to capture any other method used by the reporting entity to obtain observable inputs resulting in a hierarchy Level 1 or Level 2. Documentation of this source shall then be included in Column 22.)

“d” for securities where the rate is determined by the reporting entity or a third party contracted by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

“e” for securities where the rate is determined by the unit price published in the *NAIC Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SSAP No. 100—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value, leave blank.

Column 23 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most **stock exchange codes can be found in the Investment Schedules General Instructions.**

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-06BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [X] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input checked="" type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026 / 1st Quarter 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financials Note 5L(1) to add a reconciling adjustment line to the illustration to identify the assets pledged under multiple arrangements.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to incorporate a reconciling adjustment to Note 5L(1) to identify the assets pledged under multiple arrangements. This revision intends to result with a total of restricted assets that reflects the actual assets restricted at a reporting entity and highlights the extent that assets are pledged for multiple reasons. This item is sponsored by the chair of the SAPWG, but revisions to the SSAP No. 1 restricted asset disclosure were not deemed necessary for this blanks template change.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH & TITLE**NOTES TO FINANCIAL STATEMENTS****Note 5 - Investments****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
- i. FHLB capital stock
- j. On deposit with states
- k. On deposit with other regulatory bodies
- l. Pledged collateral to FHLB (including assets backing funding agreements)
- m. Pledged as collateral not captured in other categories
- n. Other restricted assets
- o. Collateral assets received and on balance sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

- p. Assets held under modco reinsurance agreements
- q. Assets held under funds withheld reinsurance agreements
- r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements
- rs. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.



Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|---|---|---|----------------------------------|---|--|---|--|--|-----------------------------|---------------|
| Restricted Asset Category | Total Gross (Admitted & Nonadmitted) Restricted from Current Year | Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | Increase/ (Decrease) (1 minus 2) | Total Current Year Nonadmitted Restricted | Total Current Year Admitted Restricted (1 minus 4) | Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | Admitted Restricted to Total Admitted Assets (b) | Amount Reported in General Interrogatories | Difference from Note and GI | Annual GI Ref |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | | | | 25.04 + 25.05 |
| c. Subject to repurchase agreements | | | | | | | | | | 26.21 |

| Restricted Asset Category | 1 Total Gross (Admitted & Nonadmitted) Restricted from Current Year | 2 Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | 3 Increase/ (Decrease) (1 minus 2) | 4 Total Current Year Nonadmitted Restricted | 5 Total Current Year Admitted Restricted (1 minus 4) | 6 Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | 7 Admitted Restricted to Total Admitted Assets (b) | 8 Amount Reported in General Interrogatories | 9 Difference from Note and GI | 10 Annual GI Ref |
|--|--|--|---------------------------------------|--|---|--|---|---|----------------------------------|---------------------|
| d. Subject to reverse repurchase agreements | | | | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | | | | 26.27 |
| j. On deposit with states | | | | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | | | | 26.30 |
| n. Other restricted assets | | | | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | | | | XXX | XXX | XXX |

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|---|---|---|----------------------------------|---|--|---|--|--|-----------------------------|---------------|
| Restricted Asset Category | Total Gross (Admitted & Nonadmitted) Restricted from Current Year | Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | Increase/ (Decrease) (1 minus 2) | Total Current Year Nonadmitted Restricted | Total Current Year Admitted Restricted (1 minus 4) | Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | Admitted Restricted to Total Admitted Assets (b) | Amount Reported in General Interrogatories | Difference from Note and GI | Annual GI Ref |
| p. Assets held under modco reinsurance agreements | | | | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for Assets Pledged under Multiple Arrangements</u> | | | | | | | | XXX | XXX | XXX |
| fs. Total restricted assets (Sum of a through e) | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |

- (a) Column 1 divided by Asset Page, Column 1, Line 28
- (b) Column 5 divided by Asset Page, Column 3, Line 28

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**NOTES TO FINANCIAL STATEMENTS****Note 5 – Investments****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
- i. FHLB capital stock
- j. On deposit with states
- k. On deposit with other regulatory bodies
- l. Pledged collateral to FHLB (including assets backing funding agreements)
- m. Pledged as collateral not captured in other categories
- n. Other restricted assets

o. Collateral assets received and on balance sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

p. Assets held under modco reinsurance agreements

q. Assets held under funds withheld reinsurance agreements

r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements

rs. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interregatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |
| d. Subject to reverse repurchase agreements | | | | | | | |
| e. Subject to dollar repurchase agreements | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | | | | | | | |
| g. Placed under option contracts | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | |
| i. FHLB capital stock | | | | | | | |
| j. On deposit with states | | | | | | | |

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| k. On deposit with other regulatory bodies | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | |
| m. Pledged as collateral not captured in other categories | | | | | | | |
| n. Other restricted assets | | | | | | | |
| o. Collateral assets received and on balance sheet | | | | | | | |
| p. Assets held under modco reinsurance agreements | | | | | | | |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | | | |
| rs. Total restricted assets (Sum of a through r) | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

- (a) Subset of Column 1
- (b) Subset of Column 3

| Restricted Asset Category | Current Year | | | | | | |
|--|---|---|---|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |
| d. Subject to reverse repurchase agreements | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | 26.27 |
| j. On deposit with states | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | 26.30 |

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|---|--|---|---|----------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| n. Other restricted assets | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | XXX | XXX | XXX |
| p. Assets held under modco reinsurance agreements | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | <u>XXX</u> | <u>XXX</u> | <u>XXX</u> |
| f.s. Total restricted assets (Sum of a through q) | \$ | \$ | % | % | XXX | XXX | XXX |

- (c) Column 5 divided by Asset Page, Column 1, Line 28
- (d) Column 9 divided by Asset Page, Column 3, Line 28

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY**NOTES TO FINANCIAL STATEMENTS****Note 5 – Investments****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
 - i. FHLB capital stock
 - j. On deposit with states
 - k. On deposit with other regulatory bodies
 - l. Pledged collateral to FHLB (including assets backing funding agreements)
 - m. Pledged as collateral not captured in other categories
 - n. Other restricted assets
 - o. Collateral assets received and on balance sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

- p. Assets held under modco reinsurance agreements
- q. Assets held under funds withheld reinsurance agreements
- r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements
- rs. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |
| d. Subject to reverse repurchase agreements | | | | | | | |
| e. Subject to dollar repurchase agreements | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | | | | | | | |
| g. Placed under option contracts | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | |
| i. FHLB capital stock | | | | | | | |
| j. On deposit with states | | | | | | | |

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| k. On deposit with other regulatory bodies | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | |
| m. Pledged as collateral not captured in other categories | | | | | | | |
| n. Other restricted assets | | | | | | | |
| o. Collateral assets received and on balance sheet | | | | | | | |
| p. Assets held under modco reinsurance agreements | | | | | | | |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | |
| r. Reconciling adjustment for assets pledged under multiple arrangements | | | | | | | |
| rs. Total restricted assets (Sum of a through r) | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

- (a) Subset of Column 1
- (b) Subset of Column 3

| Restricted Asset Category | Current Year | | | | | | |
|--|---|---|--|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |
| d. Subject to reverse repurchase agreements | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | 26.27 |

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|--|--|---|---|----------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| j. On deposit with states | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | 26.30 |
| n. Other restricted assets | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | XXX | XXX | XXX |
| p. Assets held under modco reinsurance agreements | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | XXX | XXX | XXX |
| rs. Total restricted assets (Sum of a through q r) | \$ | \$ | % | % | XXX | XXX | N/A |

(c) Column 5 divided by Asset Page, Column 1, Line 28

(d) Column 9 divided by Asset Page, Column 3, Line 28

QUARTERLY STATEMENT INSTRUCTIONS –HEALTH & TITLE**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5 - Investments****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
- i. FHLB capital stock
- j. On deposit with states
- k. On deposit with other regulatory bodies
- l. Pledged collateral to FHLB (including assets backing funding agreements)
- m. Pledged as collateral not captured in other categories
- n. Other restricted assets
- o. Collateral assets received and on balance sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

- p. Assets held under modco reinsurance agreements
- q. Assets held under funds withheld reinsurance agreements
- r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements
- sF. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.



Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|---|---|---|----------------------------------|---|--|---|--|--|-----------------------------|---------------|
| Restricted Asset Category | Total Gross (Admitted & Nonadmitted) Restricted from Current Year | Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | Increase/ (Decrease) (1 minus 2) | Total Current Year Nonadmitted Restricted | Total Current Year Admitted Restricted (1 minus 4) | Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | Admitted Restricted to Total Admitted Assets (b) | Amount Reported in General Interrogatories | Difference from Note and GI | Annual GI Ref |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | | | | 25.04 + 25.05 |
| c. Subject to repurchase agreements | | | | | | | | | | 26.21 |

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|--|---|---|----------------------------------|---|--|---|--|--|-----------------------------|---------------|
| Restricted Asset Category | Total Gross (Admitted & Nonadmitted) Restricted from Current Year | Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | Increase/ (Decrease) (1 minus 2) | Total Current Year Nonadmitted Restricted | Total Current Year Admitted Restricted (1 minus 4) | Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | Admitted Restricted to Total Admitted Assets (b) | Amount Reported in General Interrogatories | Difference from Note and GI | Annual GI Ref |
| d. Subject to reverse repurchase agreements | | | | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | | | | 26.27 |
| j. On deposit with states | | | | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | | | | 26.30 |
| n. Other restricted assets | | | | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | | | | XXX | XXX | XXX |

| Restricted Asset Category | 1 Total Gross (Admitted & Nonadmitted) Restricted from Current Year | 2 Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | 3 Increase/ (Decrease) (1 minus 2) | 4 Total Current Year Nonadmitted Restricted | 5 Total Current Year Admitted Restricted (1 minus 4) | 6 Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | 7 Admitted Restricted to Total Admitted Assets (b) | 8 Amount Reported in General Interrogatories | 9 Difference from Note and GI | 10 Annual GI Ref |
|---|--|--|---------------------------------------|--|---|--|---|---|----------------------------------|---------------------|
| p. Assets held under modco reinsurance agreements | | | | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | | | | XXX | XXX | XXX |
| fs. Total restricted assets (Sum of a through e) | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |

- (a) Column 1 divided by Asset Page, Column 1, Line 28
- (b) Column 5 divided by Asset Page, Column 3, Line 28

QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**NOTES TO FINANCIAL STATEMENTS****Note 5 – Investments****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
- i. FHLB capital stock
- j. On deposit with states
- k. On deposit with other regulatory bodies
- l. Pledged collateral to FHLB (including assets backing funding agreements)
- m. Pledged as collateral not captured in other categories
- n. Other restricted assets

o. Collateral assets received and on balance sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

p. Assets held under modco reinsurance agreements

q. Assets held under funds withheld reinsurance agreements

r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements

rs. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |
| d. Subject to reverse repurchase agreements | | | | | | | |
| e. Subject to dollar repurchase agreements | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | | | | | | | |
| g. Placed under option contracts | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | |
| i. FHLB capital stock | | | | | | | |
| j. On deposit with states | | | | | | | |

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| k. On deposit with other regulatory bodies | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | |
| m. Pledged as collateral not captured in other categories | | | | | | | |
| n. Other restricted assets | | | | | | | |
| o. Collateral assets received and on balance sheet | | | | | | | |
| p. Assets held under modco reinsurance agreements | | | | | | | |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | | | |
| rs. Total restricted assets (Sum of a through r) | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

- (a) Subset of Column 1
- (b) Subset of Column 3

| Restricted Asset Category | Current Year | | | | | | |
|--|---|---|---|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |
| d. Subject to reverse repurchase agreements | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | 26.27 |
| j. On deposit with states | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | 26.30 |

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|---|--|---|---|----------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| n. Other restricted assets | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | XXX | XXX | XXX |
| p. Assets held under modco reinsurance agreements | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | <u>XXX</u> | <u>XXX</u> | <u>XXX</u> |
| f s . Total restricted assets (Sum of a through e r) | \$ | \$ | % | % | XXX | XXX | XXX |

- (c) Column 5 divided by Asset Page, Column 1, Line 28
- (d) Column 9 divided by Asset Page, Column 3, Line 28

QUARTERLY STATEMENT INSTRUCTIONS – PROPERTY**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5 – Investments**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. Collateral held under security lending agreements
- c. Subject to repurchase agreements
- d. Subject to reverse repurchase agreements
- e. Subject to dollar repurchase agreements
- f. Subject to dollar reverse repurchase agreements
- g. Placed under option contracts
- h. Letter stock or securities restricted as to sale – excluding FHLB capital stock
- i. FHLB capital stock
- j. On deposit with states
- k. On deposit with other regulatory bodies
- l. Pledged collateral to FHLB (including assets backing funding agreements)
- m. Pledged as collateral not captured in other categories
- n. Other restricted assets
- o. Collateral Assets Received and on Balance Sheet

Exclude: Collateral under security lending and repurchase agreements reported on balance sheet.

- p. Assets held under Modco Reinsurance Agreements
- q. Assets held under Funds Withheld Reinsurance Agreements
- r. Reconciling Adjustment for Assets Pledged under Multiple Arrangements
- r₅. Total restricted assets

Items captured “pledged as collateral not captured in other categories” shall include, but not be limited to, assets pledged under derivative arrangements.

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |
| d. Subject to reverse repurchase agreements | | | | | | | |
| e. Subject to dollar repurchase agreements | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | | | | | | | |
| g. Placed under option contracts | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | |
| i. FHLB capital stock | | | | | | | |
| j. On deposit with states | | | | | | | |

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|--|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| k. On deposit with other regulatory bodies | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | |
| m. Pledged as collateral not captured in other categories | | | | | | | |
| n. Other restricted assets | | | | | | | |
| o. Collateral assets received and on balance sheet | | | | | | | |
| p. Assets held under modco reinsurance agreements | | | | | | | |
| q. Assets held under funds withheld reinsurance agreements | | | | | | | |
| r. Reconciling adjustment for assets pledged under multiple arrangements | | | | | | | |
| rs. Total restricted assets (Sum of a through r) | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

- (a) Subset of Column 1
- (b) Subset of Column 3

| Restricted Asset Category | Current Year | | | | | | |
|--|---|---|--|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |
| d. Subject to reverse repurchase agreements | | | | | | | 26.22 |
| e. Subject to dollar repurchase agreements | | | | | | | 26.23 |
| f. Subject to dollar reverse repurchase agreements | | | | | | | 26.24 |
| g. Placed under option contracts | | | | | | | 26.25 |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | | | | | | | 26.26 |
| i. FHLB capital stock | | | | | | | 26.27 |

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|--|--|---|---|----------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| j. On deposit with states | | | | | | | 26.28 |
| k. On deposit with other regulatory bodies | | | | | | | 26.29 |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | | | | | | | 26.31 |
| m. Pledged as collateral not captured in other categories | | | | | | | 26.30 |
| n. Other restricted assets | | | | | | | 26.32 |
| o. Collateral assets received and on balance sheet | | | | | XXX | XXX | XXX |
| p. Assets held under modco reinsurance agreements | | | | | XXX | XXX | XXX |
| q. Assets held under funds withheld reinsurance agreements | | | | | XXX | XXX | XXX |
| r. <u>Reconciling adjustment for assets pledged under multiple arrangements</u> | | | | | XXX | XXX | XXX |
| rs. Total restricted assets (Sum of a through q) | \$ | \$ | % | % | XXX | XXX | N/A |

(c) Column 5 divided by Asset Page, Column 1, Line 28

(d) Column 9 divided by Asset Page, Column 3, Line 28

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
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| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-07BWG</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting <input type="checkbox"/> [X]</p> <p>New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input type="checkbox"/> [X]</p> <p>Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment</p> <p><input type="checkbox"/> [] Referred To Another NAIC Group</p> <p><input checked="" type="checkbox"/> [X] Received For Public Comment</p> <p><input type="checkbox"/> [] Adopted Date _____</p> <p><input type="checkbox"/> [] Rejected Date _____</p> <p><input type="checkbox"/> [] Deferred Date _____</p> <p><input type="checkbox"/> [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input type="checkbox"/> [] CROSSCHECKS |
| <input checked="" type="checkbox"/> [X] QUARTERLY STATEMENT | <input type="checkbox"/> [] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> [X] Separate Accounts | <input checked="" type="checkbox"/> [X] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input checked="" type="checkbox"/> [X] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026 / 1st Quarter 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Schedule D, Part 1, Section 1 and 2 to add clarification to the instructions for the payment due at maturity column and also specify what reporting categories should be reporting in this column. Also add clarifying instructions to the origination balloon payment percentage column on Schedule D, Part 1, Section 2. For Schedule BA, Parts 1, 2, and 3 add clarification to the maturity date column to complete the column if the investment has a contractual stated maturity date.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to incorporate clarifying revisions to the instructions for completing certain investment reporting columns (payment due at maturity, origination balloon payment and Schedule BA maturity date.) It also limits the reporting scope for the payment due at maturity on both Schedule D-1-1 and Schedule D-1-2. (SAPWG Ref. 2025-29)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

SCHEDULE D – PART 1- SECTION 1

LONG-TERM BONDS – ISSUER CREDIT OBLIGATIONS OWNED DECEMBER 31 OF CURRENT YEAR



Column 20 – Payment Due at Maturity

Report the contractual payment due at the legal maturity date. Include the final principal payment (including balloon payments) as well as interest to be paid at maturity. The amount reported at acquisition shall not be subsequently revised unless additional lots are purchased or if lots are sold. If there is no contractual amount to be paid at legal maturity, report zero.

Use only for asset-backed securities reported in the following categories:

- Single Entity Backed Obligations (Unaffiliated & Affiliated)

SCHEDULE D – PART 1 – SECTION 2**ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR**


Detail Eliminated To Conserve Space



Column 20 – Payment Due at Maturity

Report the contractual payment due at the legal maturity date. Include the final principal payment (including balloon payments) as well as interest to be paid at maturity. The amount reported at acquisition shall not be subsequently revised unless additional lots are purchased or if lots are sold. If there is no contractual amount to be paid at legal maturity, report zero.

Use only for asset-backed securities reported in the following categories:

- Financial Asset-Backed Securities – Not Self-Liquidating
- Non-Financial Asset-Backed Securities – Practical Expedient
- Non-Financial Asset-Backed Securities – Full Analysis

Column 21 – Origination Balloon Payment %

Use only for asset-backed securities reported in the following categories:

- Financial Asset-Backed Securities – Not Self-Liquidating
- Non-Financial Asset-Backed Securities – Practical Expedient
- Non-Financial Asset-Backed Securities – Full Analysis

Include the percentage of contractual balloon payment due at legal maturity based on the original outstanding principal amount. For example, if the original security had principal repayment of \$100 and \$80 is scheduled to be paid at maturity, the balloon payment percentage at origination is 80%. Origination date information shall be used when available. For instruments purchased on the secondary market, for which origination date information is not available as of the acquisition date may be used using best efforts to obtain data. The balloon percentage shall not be adjusted subsequent to origination regardless of principal reduction or payments in advance of maturity that reduce the outstanding balloon. If there is no balloon payment, then update-report with 0%.

SCHEDULE BA – PART 1

OTHER LONG-TERM INVESTED ASSETS OWNED DECEMBER 31 OF CURRENT YEAR



Detail Eliminated To Conserve Space

Column 26 – Maturity Date

The maturity date shall be reported for all investments on Schedule BA that have a contractual stated maturity date. This is anticipated to include, but not limited to, all investments captured as non-bond debt securities, surplus notes, capital notes, collateral loans, non-collateral loans, and investments in tax credits. However, this list should not be considered all-inclusive for investments captured on other reporting lines with stated maturity dates.

SCHEDULE BA – PART 2

OTHER LONG-TERM INVESTED ASSETS ACQUIRED AND ADDITIONS MADE DURING THE YEAR



Detail Eliminated To Conserve Space

Column 15 – Maturity Date

The maturity date shall be reported for all investments on Schedule BA that have a contractual stated maturity date. This is anticipated to include, but not limited to, all investments captured as non-bond debt securities, surplus notes, capital notes, collateral loans, non-collateral loans, and investments in tax credits. However, this list should not be considered all-inclusive for investments captured on other reporting lines with stated maturity dates.

SCHEDULE BA – PART 3

OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAYED DURING THE YEAR



Detail Eliminated To Conserve Space

Column 24 – Maturity Date

The maturity date shall be reported for all investments on Schedule BA that have a contractual stated maturity date. This is anticipated to include, but not limited to, all investments captured as non-bond debt securities, surplus notes, capital notes, collateral loans, non-collateral loans, and investments in tax credits. However, this list should not be considered all-inclusive for investments captured on other reporting lines with stated maturity dates.

SCHEDULE BA – PART 3

**OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAYED
DURING THE CURRENT QUARTER**



Detail Eliminated To Conserve Space

Column 24 – Maturity Date

The maturity date shall be reported for all investments on Schedule BA that have a contractual stated maturity date. This is anticipated to include, but not limited to, all investments captured as non-bond debt securities, surplus notes, capital notes, collateral loans, non-collateral loans, and investments in tax credits. However, this list should not be considered all-inclusive for investments captured on other reporting lines with stated maturity dates.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: <u>Bailey Henning</u></p> <p>TELEPHONE: <u>816-783-8129</u></p> <p>EMAIL ADDRESS: <u>bhenning@naic.org</u></p> <p>ON BEHALF OF: <u>Financial Regulatory Standards & Accreditation (F) Committee</u></p> <p>NAME: _____</p> <p>TITLE: _____</p> <p>AFFILIATION: _____</p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-08BWG MOD</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting <input type="checkbox"/> [X]</p> <p>New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input type="checkbox"/> [X]</p> <p>Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment</p> <p><input type="checkbox"/> [] Referred To Another NAIC Group</p> <p><input checked="" type="checkbox"/> [X] Received For Public Comment</p> <p><input type="checkbox"/> [] Adopted Date _____</p> <p><input type="checkbox"/> [] Rejected Date _____</p> <p><input type="checkbox"/> [] Deferred Date _____</p> <p><input type="checkbox"/> [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input checked="" type="checkbox"/> [X] CROSSCHECKS |
| <input checked="" type="checkbox"/> [X] QUARTERLY STATEMENT | <input checked="" type="checkbox"/> [X] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input checked="" type="checkbox"/> [X] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input checked="" type="checkbox"/> [X] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

This proposal is to allow for an additional option in the list of active status codes on Schedule T to include an "O - Other" category for reporting entities that have a unique, restricted license type that does not fit into one of the other existing categories. This category would be used by captive insurers, international insurers, or other types of insurers that have received an insurance authorization from a U.S. jurisdiction, but do not qualify as fully admitted carriers and do not fit into one of the other categories.

The proposal also edits the "N – None of the Above" status code to change it to "N – None," as instances where the existing codes do not apply would now be reported through the "O – Other" status code. In addition, the proposal adds a field to Schedule T for the reporting entity to provide a description of the "O – Other" license type being reported.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The benefit of this change is that the authorization of unique entities will be more accurately and consistently presented on Schedule T, which will assist states in monitoring an entity's licensed status and ongoing business activities.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments: ***** DRAFTING NOTE: Proposal 2024-19BWG's changes are not shown in this proposal.*****

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – HEALTH**SCHEDULE T – PREMIUMS AND OTHER CONSIDERATIONS****ALLOCATED BY STATES AND TERRITORIES**

Premiums are reported on a written basis, gross of reinsurance.

Written premium is defined as the contractually determined amount charged by the reporting entity to the policyholder for the effective period of the contract based on the expectation of risk, policy benefits, and expenses associated with the coverage provided by the terms of the insurance contract. For health contracts without fixed contract periods, premiums written will be equal to the amount collected during the reporting period plus uncollected premiums at the end of the period less uncollected premiums at the beginning of the period.

All premium adjustments (both increases and decreases), including but not limited to Affordable Care Act (ACA) premium adjustments related to the risk adjustment program, shall be allocated as premium in the respective jurisdiction.

Column 1 – Active Status

Use the following codes to identify the reporting entity's status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity's status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

| | |
|----------------------------------|--|
| L – Licensed or Chartered | (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.) |
| R – Registered | (Non-domiciled Risk Retention Groups) |
| E – Eligible | (Reporting Entities eligible or approved to write Surplus Lines in the state. In some states referred to as nonadmitted.) |
| Q – Qualified | (Qualified or Accredited Reinsurer) |
| <u>O – Other</u> | <u>(Reporting entities have a unique and limited status in the state where none of the other codes apply (e.g., captive or international insurer¹))</u> |
| N – None of the above | (Not allowed to write business in the state or none of the above codes apply) |

¹ The term "international insurer" refers to a specific type of insurance authority granted by a state or territory, and not a generic term for an alien insurer operating in the U.S.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**SCHEDULE T – PREMIUMS AND ANNUITY CONSIDERATIONS****ALLOCATED BY STATES AND TERRITORIES**

This schedule is intended to exhibit the amount of premium and annuity considerations, and deposit-type contracts allocated to each state. For Life Companies only, this Schedule also provides: (a) the starting point for the calculation of state premium taxes, and (b) the starting point for the calculation of premium-based, state guaranty association assessments. (The basis for such assessments is developed in the Life, Health, and Annuity Guaranty Association Assessable Premium Exhibit, not in Schedule T.) See the instructions to the Life, Health, and Annuity Guaranty Association Assessable Premium Exhibit for allocated and unallocated annuities reported in Columns 3, 5, and 7.

Report premiums and annuity considerations for life and health contracts and deposit-type contracts for direct business. Exclude contract proceeds left with the reporting entity, such as amounts for supplemental contracts, dividend or refund accumulations and other similar items. Dividends or refunds on contracts that are used to pay renewal life and accident and health insurance premiums or annuity considerations should be included in the amounts allocated to the states and territories in Columns 2, 3, 4, and 5.

All premium adjustments (both increases and decreases), including but not limited to Affordable Care Act (ACA) premium adjustments related to the risk adjustment program, shall be allocated as premium in the respective jurisdiction.

Refer to *SSAP No. 50—Classifications of Insurance or Managed Care Contracts* for life, accident and health and deposit-type contract definitions, *SSAP No. 51—Life Contracts* and *SSAP No. 52—Deposit-Type Contracts* for accounting guidance.

Column 1 – Active Status

Use the following codes to identify the reporting entity's status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity's status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

- | | | | |
|---|---|------------------------------|---|
| L | – | Licensed or Chartered | (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.) |
| R | – | Registered | (Non-domiciled Risk Retention Groups) |
| E | – | Eligible | (Reporting Entities eligible or approved to write Surplus Lines in the state. In some states referred to as nonadmitted.) |
| Q | – | Qualified | (Qualified or Accredited Reinsurer) |
| O | – | Qualified Other | (Reporting entities have a unique and limited status in the state where none of the other codes apply (e.g., captive or international insurer ²)) |
| N | – | None of the above | (Not allowed to write business in the state or none of the above codes apply) |

² The term "international insurer" refers to a specific type of insurance authority granted by a state or territory, and not a generic term for an alien insurer operating in the U.S.

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY/CASUALTY**SCHEDULE T – EXHIBIT OF PREMIUMS WRITTEN****ALLOCATED BY STATES AND TERRITORIES**

This schedule is intended to report premiums, losses, and other items allocated to each state or territory during the current reporting period, regardless of the reporting entity's license status in that state or territory. Allocation of premiums and the other items reported on this schedule should be based on the physical location of the insured risk (except individual and group health insurance). Amounts reported as losses should be assigned to the state in which the associated premium has been allocated.

All U.S. business must be allocated by state regardless of license status.

All premium adjustments (both increases and (decreases)), including but not limited to Affordable Care Act (ACA) premium adjustments related to the risk adjustment program, shall be allocated as premium in the respective jurisdiction.

Column 1 – Active Status

Use the following codes to identify the reporting entity's status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity's status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

| | |
|----------------------------------|---|
| L – Licensed or Chartered | (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.) |
| R – Registered | (Non-domiciled Risk Retention Groups) |
| E – Eligible | (Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile – see DSLI). In some states referred to as nonadmitted.) |
| Q – Qualified | (Qualified or Accredited Reinsurer) |
| D – DSLI | (Domestic Surplus Lines Insurer (DSLI) – Reporting Entities authorized to write Surplus Lines in the state of domicile) |
| <u>O – Other</u> | <u>(Reporting entities have a unique and limited status in the state where none of the other codes apply (e.g., captive or international insurer³))</u> |
| N – None of the above | (Not allowed to write business in the state or none of the above codes apply) |

³ The term "international insurer" refers to a specific type of insurance authority granted by a state or territory, and not a generic term for an alien insurer operating in the U.S.

ANNUAL STATEMENT INSTRUCTIONS – TITLE

SCHEDULE T – EXHIBIT OF PREMIUMS WRITTEN

BY STATES AND TERRITORIES



Detail Eliminated To Conserve Space

Column 1 – Active Status

Use the following codes to identify the reporting entity’s status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity’s status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

- L – Licensed or Chartered (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.)
- R – Registered (Non-domiciled Risk Retention Groups)
- E – Eligible (Reporting Entities eligible or approved to write Surplus Lines in the state. In some states referred to as nonadmitted.)
- Q – Qualified (Qualified or Accredited Reinsurer)
- O – Other (Reporting entities have a unique and limited status in the state where none of the other codes apply (e.g., captive or international insurer⁴))
- N – ~~None of the above~~ (Not allowed to write business in the state ~~or none of the above codes apply~~)

⁴ The term “international insurer” refers to a specific type of insurance authority granted by a state or territory, and not a generic term for an alien insurer operating in the U.S.

ANNUAL STATEMENT BLANK – HEALTH

SCHEDULE T – PREMIUMS AND OTHER CONSIDERATIONS

Allocated by States and Territories

| State, Etc. | 1 Active Status (a) | Direct Business Only | | | | | | | | |
|--|---------------------------|---------------------------------------|------------------------------|----------------------------|------------------------|---|--|--|--------------------------------------|-------------------------------------|
| | | 2 Accident & Health Premiums | 3 Medicare Title XVIII | 4 Medicaid Title XIX | 5 CHIP Title XXI | 6 Federal Employees Health Benefits Plan Premiums | 7 Life & Annuity Premiums & Other Considerations | 8 Property/ Casualty Premiums | 9 Total Columns 2 Through 8 | 10 Deposit- Type Contracts |
| 1. Alabama..... AL | | | | | | | | | | |
| 2. Alaska..... AK | | | | | | | | | | |
| 3. Arizona..... AZ | | | | | | | | | | |
| 4. Arkansas..... AR | | | | | | | | | | |
| 5. California..... CA | | | | | | | | | | |
| 6. Colorado..... CO | | | | | | | | | | |
| 7. Connecticut..... CT | | | | | | | | | | |
| 8. Delaware..... DE | | | | | | | | | | |
| 9. Dist. Columbia..... DC | | | | | | | | | | |
| 10. Florida..... FL | | | | | | | | | | |
| 11. Georgia..... GA | | | | | | | | | | |
| 12. Hawaii..... HI | | | | | | | | | | |
| 13. Idaho..... ID | | | | | | | | | | |
| 14. Illinois..... IL | | | | | | | | | | |
| 15. Indiana..... IN | | | | | | | | | | |
| 16. Iowa..... IA | | | | | | | | | | |
| 17. Kansas..... KS | | | | | | | | | | |
| 18. Kentucky..... KY | | | | | | | | | | |
| 19. Louisiana..... LA | | | | | | | | | | |
| 20. Maine..... ME | | | | | | | | | | |
| 21. Maryland..... MD | | | | | | | | | | |
| 22. Massachusetts..... MA | | | | | | | | | | |
| 23. Michigan..... MI | | | | | | | | | | |
| 24. Minnesota..... MN | | | | | | | | | | |
| 25. Mississippi..... MS | | | | | | | | | | |
| 26. Missouri..... MO | | | | | | | | | | |
| 27. Montana..... MT | | | | | | | | | | |
| 28. Nebraska..... NE | | | | | | | | | | |
| 29. Nevada..... NV | | | | | | | | | | |
| 30. New Hampshire..... NH | | | | | | | | | | |
| 31. New Jersey..... NJ | | | | | | | | | | |
| 32. New Mexico..... NM | | | | | | | | | | |
| 33. New York..... NY | | | | | | | | | | |
| 34. North Carolina..... NC | | | | | | | | | | |
| 35. North Dakota..... ND | | | | | | | | | | |
| 36. Ohio..... OH | | | | | | | | | | |
| 37. Oklahoma..... OK | | | | | | | | | | |
| 38. Oregon..... OR | | | | | | | | | | |
| 39. Pennsylvania..... PA | | | | | | | | | | |
| 40. Rhode Island..... RI | | | | | | | | | | |
| 41. South Carolina..... SC | | | | | | | | | | |
| 42. South Dakota..... SD | | | | | | | | | | |
| 43. Tennessee..... TN | | | | | | | | | | |
| 44. Texas..... TX | | | | | | | | | | |
| 45. Utah..... UT | | | | | | | | | | |
| 46. Vermont..... VT | | | | | | | | | | |
| 47. Virginia..... VA | | | | | | | | | | |
| 48. Washington..... WA | | | | | | | | | | |
| 49. West Virginia..... WV | | | | | | | | | | |
| 50. Wisconsin..... WI | | | | | | | | | | |
| 51. Wyoming..... WY | | | | | | | | | | |
| 52. American Samoa..... AS | | | | | | | | | | |
| 53. Guam..... GU | | | | | | | | | | |
| 54. Puerto Rico..... PR | | | | | | | | | | |
| 55. U.S. Virgin Islands..... VI | | | | | | | | | | |
| 56. Northern Mariana Islands..... MP | | | | | | | | | | |
| 57. Canada..... CAN | | | | | | | | | | |
| 58. Aggregate other alien..... OT | XXX | | | | | | | | | |
| 59. Subtotal..... | XXX | | | | | | | | | |
| 60. Reporting entity contributions for employee benefit plans..... | XXX | | | | | | | | | |
| 61. Total (direct business) | XXX | | | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | | | | |
| 58001..... | XXX | | | | | | | | | |
| 58002..... | XXX | | | | | | | | | |
| 58003..... | XXX | | | | | | | | | |
| 58998. Summary of remaining write-ins for Line 58 from overflow page..... | XXX | | | | | | | | | |
| 58999. Totals (Lines 58001 through 58003 plus 58998) (Line 58 above) | XXX | | | | | | | | | |

(a) Active Status Counts:

- 1. L – Licensed or Chartered – Licensed insurance carrier or domiciled RRG..... _____
- 2. R – Registered – Non-domiciled RRGs..... _____
- 3. E – Eligible - Reporting entities eligible or approved to write surplus lines in the state _____
- 4. Q – Qualified - Qualified or accredited reinsurer..... _____
- 5. O – Other - Unique and limited status..... _____
- 56. N – None of the above – Not allowed to write business in the state..... _____

(b) Explanation of basis of allocation by states, premiums by state, etc.

(c) Description of Other Status:

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL

SCHEDULE T – PREMIUMS AND ANNUITY CONSIDERATIONS

Allocated by States and Territories

| States, Etc. | 1 Active Status (a) | Direct Business Only | | | | | |
|---|------------------------|------------------------------------|--------------------------------|--|------------------------------|---------------------------------------|---------------------------------|
| | | Life Contracts | | 4 Accident and Health Insurance Premiums, Including Policy, Membership and Other Fees | 5 Other Considerations | 6 Total Columns 2 through 5 (b) | 7 Deposit -Type Contracts |
| | | 2 Life Insurance Premiums | 3 Annuity Considerations | | | | |
| 1. Alabama.....AL | | | | | | | |
| 2. Alaska.....AK | | | | | | | |
| 3. Arizona.....AZ | | | | | | | |
| 4. Arkansas.....AR | | | | | | | |
| 5. California.....CA | | | | | | | |
| 6. Colorado.....CO | | | | | | | |
| 7. Connecticut.....CT | | | | | | | |
| 8. Delaware.....DE | | | | | | | |
| 9. District of Columbia.....DC | | | | | | | |
| 10. Florida.....FL | | | | | | | |
| 11. Georgia.....GA | | | | | | | |
| 12. Hawaii.....HI | | | | | | | |
| 13. Idaho.....ID | | | | | | | |
| 14. Illinois.....IL | | | | | | | |
| 15. Indiana.....IN | | | | | | | |
| 16. Iowa.....IA | | | | | | | |
| 17. Kansas.....KS | | | | | | | |
| 18. Kentucky.....KY | | | | | | | |
| 19. Louisiana.....LA | | | | | | | |
| 20. Maine.....ME | | | | | | | |
| 21. Maryland.....MD | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | |
| 23. Michigan.....MI | | | | | | | |
| 24. Minnesota.....MN | | | | | | | |
| 25. Mississippi.....MS | | | | | | | |
| 26. Missouri.....MO | | | | | | | |
| 27. Montana.....MT | | | | | | | |
| 28. Nebraska.....NE | | | | | | | |
| 29. Nevada.....NV | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | |
| 32. New Mexico.....NM | | | | | | | |
| 33. New York.....NY | | | | | | | |
| 34. North Carolina.....NC | | | | | | | |
| 35. North Dakota.....ND | | | | | | | |
| 36. Ohio.....OH | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | |
| 38. Oregon.....OR | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | |
| 41. South Carolina.....SC | | | | | | | |
| 42. South Dakota.....SD | | | | | | | |
| 43. Tennessee.....TN | | | | | | | |
| 44. Texas.....TX | | | | | | | |
| 45. Utah.....UT | | | | | | | |
| 46. Vermont.....VT | | | | | | | |
| 47. Virginia.....VA | | | | | | | |
| 48. Washington.....WA | | | | | | | |
| 49. West Virginia.....WV | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | |
| 51. Wyoming.....WY | | | | | | | |
| 52. American Samoa.....AS | | | | | | | |
| 53. Guam.....GU | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | |
| 57. Canada.....CAN | | | | | | | |
| 58. Aggregate other alien.....OT | | | | | | | |
| 59. Subtotal..... | XXX | | | | | | |
| 90. Reporting entity contributions for employee benefits plans..... | XXX | | | | | | |
| 91. Dividends or refunds applied to purchase paid-up additions and annuities..... | XXX | | | | | | |
| 92. Dividends or refunds applied to shorten endowment or premium paying period..... | XXX | | | | | | |
| 93. Premium or annuity considerations waived under disability or other contract provisions..... | XXX | | | | | | |
| 94. Aggregate other amounts not allocable by State..... | XXX | | | | | | |
| 95. Totals (direct business)..... | XXX | | | | | | |
| 96. Plus reinsurance assumed..... | XXX | | | | | | |
| 97. Totals (all business)..... | XXX | | | | | | |
| 98. Less reinsurance ceded..... | XXX | | | | | | |
| 99. Totals (all business) less reinsurance ceded..... | XXX | | | (c) | | | |
| DETAILS OF WRITE-INS | | | | | | | |
| 58001. | XXX | | | | | | |
| 58002. | XXX | | | | | | |
| 58003. | XXX | | | | | | |
| 58998. Summary of remaining write-ins for Line 58 from overflow page..... | XXX | | | | | | |
| 58999. Total (Lines 58001 through 58003 + 58998) (Line 58 above) | | | | | | | |
| 9401. | XXX | | | | | | |
| 9402. | XXX | | | | | | |
| 9403. | XXX | | | | | | |
| 9498. Summary of remaining write-ins for Line 94 from overflow page..... | XXX | | | | | | |
| 9499. Total (Lines 9401 through 9403 + 9498) (Line 94 above) | | | | | | | |

(a) Active Status Counts:
 1. L – Licensed or Chartered - Licensed insurance carrier or domiciled RRG
 2. R – Registered - Non-domiciled RRGs.....
 3. E – Eligible - Reporting entities eligible or approved to write surplus lines in the state.....
 4. Q – Qualified - Qualified or accredited reinsurer
 5. O – Other - Unique and limited status.....
 6. N – None of the above - Not allowed to write business in the state.....

(b) Explanation of basis of allocation by states, etc., of premiums and annuity considerations
 (c) Description of Other status:
 (ed) Column 4 should balance with Exhibit 1, Lines 6.4, 10.4 and 16.4, Col.6, or with Schedule H, Part 1, Column 1, Line 1 indicate which;

ANNUAL STATEMENT BLANK – PROPERTY

**SCHEDULE T – EXHIBIT OF PREMIUMS WRITTEN
Allocated By States And Territories**

| States, Etc. | 1 Active Status (a) | Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken | | 4 Dividends Paid or Credited to Policyholders on Direct Business | 5 Direct Losses Paid (Deducting Salvage) | 6 Direct Losses Incurred | 7 Direct Losses Unpaid | 8 Finance and Service Charges Not Included in Premiums | 9 Direct Premium Written for Federal Purchasing Groups (Included in Col. 2) |
|--|---------------------------|--|-----------------------------|---|---|-----------------------------|---------------------------|---|--|
| | | 2 Direct Premiums Written | 3 Direct Premiums Earned | | | | | | |
| 1. Alabama.....AL | | | | | | | | | |
| 2. Alaska.....AK | | | | | | | | | |
| 3. Arizona.....AZ | | | | | | | | | |
| 4. Arkansas.....AR | | | | | | | | | |
| 5. California.....CA | | | | | | | | | |
| 6. Colorado.....CO | | | | | | | | | |
| 7. Connecticut.....CT | | | | | | | | | |
| 8. Delaware.....DE | | | | | | | | | |
| 9. Dist. Columbia.....DC | | | | | | | | | |
| 10. Florida.....FL | | | | | | | | | |
| 11. Georgia.....GA | | | | | | | | | |
| 12. Hawaii.....HI | | | | | | | | | |
| 13. Idaho.....ID | | | | | | | | | |
| 14. Illinois.....IL | | | | | | | | | |
| 15. Indiana.....IN | | | | | | | | | |
| 16. Iowa.....IA | | | | | | | | | |
| 17. Kansas.....KS | | | | | | | | | |
| 18. Kentucky.....KY | | | | | | | | | |
| 19. Louisiana.....LA | | | | | | | | | |
| 20. Maine.....ME | | | | | | | | | |
| 21. Maryland.....MD | | | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | | | |
| 23. Michigan.....MI | | | | | | | | | |
| 24. Minnesota.....MN | | | | | | | | | |
| 25. Mississippi.....MS | | | | | | | | | |
| 26. Missouri.....MO | | | | | | | | | |
| 27. Montana.....MT | | | | | | | | | |
| 28. Nebraska.....NE | | | | | | | | | |
| 29. Nevada.....NV | | | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | | | |
| 32. New Mexico.....NM | | | | | | | | | |
| 33. New York.....NY | | | | | | | | | |
| 34. No. Carolina.....NC | | | | | | | | | |
| 35. No. Dakota.....ND | | | | | | | | | |
| 36. Ohio.....OH | | | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | | | |
| 38. Oregon.....OR | | | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | | | |
| 41. So. Carolina.....SC | | | | | | | | | |
| 42. So. Dakota.....SD | | | | | | | | | |
| 43. Tennessee.....TN | | | | | | | | | |
| 44. Texas.....TX | | | | | | | | | |
| 45. Utah.....UT | | | | | | | | | |
| 46. Vermont.....VT | | | | | | | | | |
| 47. Virginia.....VA | | | | | | | | | |
| 48. Washington.....WA | | | | | | | | | |
| 49. West Virginia.....WV | | | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | | | |
| 51. Wyoming.....WY | | | | | | | | | |
| 52. American Samoa.....AS | | | | | | | | | |
| 53. Guam.....GU | | | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | | | |
| 57. Canada.....CAN | | | | | | | | | |
| 58. Aggregate other alien.....OT | | | | | | | | | |
| 59. Totals | XXX | | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | | | |
| 58001. | XXX | | | | | | | | |
| 58002. | XXX | | | | | | | | |
| 58003. | XXX | | | | | | | | |
| 58998. Sum. of remaining write-ins for Line 58 from overflow page..... | XXX | | | | | | | | |
| 58999. Totals (Lines 58001 through 58003+58998) (Line 58 above) | XXX | | | | | | | | |

(a) Active Status Counts:

- | | | | |
|--|-------|---|-------|
| 1. L – Licensed or Chartered - Licensed insurance carrier or domiciled RRG..... | _____ | 4. Q – Qualified - Qualified or accredited reinsurer | _____ |
| 2. R – Registered - Non-domiciled RRGs | _____ | 5. D – Domestic Surplus Lines Insurer (DSL) – Reporting entities authorized to write surplus lines in the state of domicile. | _____ |
| 3. E – Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile – See DSL) | _____ | 6. O – Other – Unique and limited status | _____ |
| | | 6Z. N – None of the above – Not allowed to write business in the state | _____ |

- (b) Explanation of basis of allocation of premiums by states, etc.
- (c) Description of Other status:

ANNUAL STATEMENT BLANK – TITLE

**SCHEDULE T – EXHIBIT OF PREMIUMS WRITTEN
By States and Territories**

| States, Etc. | 1 Active Status (a) | 2 Premium Rate (b) | Direct Premiums Written | | | 6 Other Income | 7 Net Premiums Earned | 8 Direct Losses and Allocated Loss Adjustment Expenses Paid | 9 Direct Losses and Allocated Loss Adjustment Expenses Incurred | 10 Direct Known Claim Reserve |
|--|------------------------|-----------------------|-------------------------|------------------------------|--------------------------|-------------------|--------------------------|--|--|----------------------------------|
| | | | 3 Direct Operations | 4 Agency Operations | | | | | | |
| | | | | 4 Non-affiliated Agencies | 5 Affiliated Agencies | | | | | |
| 1. Alabama.....AL | | | | | | | | | | |
| 2. Alaska.....AK | | | | | | | | | | |
| 3. Arizona.....AZ | | | | | | | | | | |
| 4. Arkansas.....AR | | | | | | | | | | |
| 5. California.....CA | | | | | | | | | | |
| 6. Colorado.....CO | | | | | | | | | | |
| 7. Connecticut.....CT | | | | | | | | | | |
| 8. Delaware.....DE | | | | | | | | | | |
| 9. Dist. Columbia.....DC | | | | | | | | | | |
| 10. Florida.....FL | | | | | | | | | | |
| 11. Georgia.....GA | | | | | | | | | | |
| 12. Hawaii.....HI | | | | | | | | | | |
| 13. Idaho.....ID | | | | | | | | | | |
| 14. Illinois.....IL | | | | | | | | | | |
| 15. Indiana.....IN | | | | | | | | | | |
| 16. Iowa.....IA | | | | | | | | | | |
| 17. Kansas.....KS | | | | | | | | | | |
| 18. Kentucky.....KY | | | | | | | | | | |
| 19. Louisiana.....LA | | | | | | | | | | |
| 20. Maine.....ME | | | | | | | | | | |
| 21. Maryland.....MD | | | | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | | | | |
| 23. Michigan.....MI | | | | | | | | | | |
| 24. Minnesota.....MN | | | | | | | | | | |
| 25. Mississippi.....MS | | | | | | | | | | |
| 26. Missouri.....MO | | | | | | | | | | |
| 27. Montana.....MT | | | | | | | | | | |
| 28. Nebraska.....NE | | | | | | | | | | |
| 29. Nevada.....NV | | | | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | | | | |
| 32. New Mexico.....NM | | | | | | | | | | |
| 33. New York.....NY | | | | | | | | | | |
| 34. No. Carolina.....NC | | | | | | | | | | |
| 35. No. Dakota.....ND | | | | | | | | | | |
| 36. Ohio.....OH | | | | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | | | | |
| 38. Oregon.....OR | | | | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | | | | |
| 41. So. Carolina.....SC | | | | | | | | | | |
| 42. So. Dakota.....SD | | | | | | | | | | |
| 43. Tennessee.....TN | | | | | | | | | | |
| 44. Texas.....TX | | | | | | | | | | |
| 45. Utah.....UT | | | | | | | | | | |
| 46. Vermont.....VT | | | | | | | | | | |
| 47. Virginia.....VA | | | | | | | | | | |
| 48. Washington.....WA | | | | | | | | | | |
| 49. West Virginia.....WV | | | | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | | | | |
| 51. Wyoming.....WY | | | | | | | | | | |
| 52. American Samoa.....AS | | | | | | | | | | |
| 53. Guam.....GU | | | | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | | | | |
| 57. Canada.....CAN | | | | | | | | | | |
| 58. Aggregate Other Alien.....OT | XXX | XXX | | | | | | | | |
| 59. Totals | XXX | XXX | | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | | | | |
| 58001. | XXX | | | | | | | | | |
| 58002. | XXX | | | | | | | | | |
| 58003. | XXX | | | | | | | | | |
| 58998. Summary of remaining write-ins for Line 58 from overflow page | XXX | XXX | | | | | | | | |
| 58999. Totals (Lines 58001 through 58003 plus 58998) (Line 58 above) | XXX | XXX | | | | | | | | |

(a) Active Status Counts:

- 1. L – Licensed or Chartered - Licensed insurance carrier or domiciled RRG
- 2. R – Registered - Non-domiciled RRGs
- 3. E – Eligible - Reporting entities eligible or approved to write surplus lines in the state
- 4. Q – Qualified - Qualified or accredited reinsurer
- 5. O – Other - Unique and limited status
- 56. N – None of the above - Not allowed to write business in the state

(b) Each type of rate must be coded with a combination of the five activity codes (R, S, X, C, and/or E) listed in the instructions. Use the code combination corresponding to the state's statutory definitions of title insurance premium. If more than one combination of activities is indicated in the statutory definition, all relevant combinations must be listed. See the Schedule T instructions.

(c) Description of Other Status:

W:\QA\BlanksProposals\2026-08BWG_Modified.docx

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-09BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [X] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the Five-Year Historical to add a line reporting short-term and cash equivalent affiliated investments.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal reincorporate the affiliated short-term line to the Five-Year Historical. It was previously removed with proposal 2024-02BWG but has since been determined that the reporting line needs to be included on the schedule.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – HEALTH

FIVE-YEAR HISTORICAL DATA



Detail Eliminated To Conserve Space

Investments in Parent, Subsidiaries, and Affiliates

Line 26 – Affiliated Bonds

All years Schedule D Summary By Country, Line 9+15, Column 1

Line 27 – Affiliated Preferred Stocks

All years Schedule D Summary By Country, Line 22, Column 1

Line 28 – Affiliated Common Stocks

All years Schedule D Summary By Country, Line 28, Column 1

Line 29 – Affiliated Short-term Investment and Cash Equivalent

All years Subtotal included in Schedule DA, Part 1, Line 7699999999, Column 6 and
Schedule E, Part 2, Line 8599999999, Column 7

Line ~~32-33~~ – Total Investment in Parent

Report the amount of investments reported in Lines 26 to ~~30-31~~ above that are in an immediate or indirect parent.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

FIVE-YEAR HISTORICAL DATA



Detail Eliminated To Conserve Space

Investments in Parent, Subsidiaries, and Affiliates

Line 44 – Affiliated Bonds

All years Schedule D Summary By Country, Line 9+15, Column 1

Line 45 – Affiliated Preferred Stocks

All years Schedule D Summary By Country, Line 22, Column 1

Line 46 – Affiliated Common Stocks

All years Schedule D Summary By Country, Line 28, Column 1

Line 47 – Affiliated Short-term Investment and Cash Equivalent

All years Subtotal included in Schedule DA, Part 1, Line 7699999999, Column 6 and
Schedule E, Part 2, Line 8599999999, Column 7

Line ~~50-51~~ – Total Investment in Parent

Report the amount of investments reported in Lines 44 to ~~48-49~~ above that are in an immediate or indirect parent.

***** Drafting Note – Renumber remaining lines in instructions. *****

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY

FIVE-YEAR HISTORICAL DATA



Detail Eliminated To Conserve Space

Investments in Parent, Subsidiaries, and Affiliates

Line 42 – Affiliated Bonds

All years Schedule D Summary By Country, Line 9+15, Column 1

Line 43 – Affiliated Preferred Stocks

All years Schedule D Summary By Country, Line 22, Column 1

Line 44 – Affiliated Common Stock

All years Schedule D Summary By Country, Line 28, Column 1

Line 45 – Affiliated Short-term Investment and Cash Equivalent

All years Subtotal included in Schedule DA, Part 1, Line 7699999999, Column 6 and
Schedule E, Part 2, Line 8599999999, Column 7

Line ~~48-49~~ – Total Investment in Parent

Report the amount of investments reported in Lines 42 to ~~46-47~~ above that are in an immediate or indirect parent.

Line ~~49~~50– Percentage of Investments in Parents, Subsidiaries, and Affiliates to Surplus as Regards Policyholders

All years Five Year Historical, Line ~~47-48~~ divided by Page 3, Column 1, Line 37 x 100.0

***** Drafting Note – Renumber remaining lines in instructions. *****

ANNUAL STATEMENT INSTRUCTIONS – TITLE

FIVE-YEAR HISTORICAL DATA



Detail Eliminated To Conserve Space

Investment in Parent, Subsidiaries, and Affiliates

Line 38 – Affiliated Bonds

All years Schedule D Summary By Country, Line 9+15, Column 1

Line 39 – Affiliated Preferred Stock

All years Schedule D Summary By Country, Line 22, Column 1

Line 40 – Affiliated Common Stock

All years Schedule D Summary By Country, Line 28, Column 1

Line 41 – Affiliated Short-term Investment and Cash Equivalent

All years Subtotal included in Schedule DA, Part 1, Line 7699999999, Column 6 and
Schedule E, Part 2, Line 8599999999, Column 7

Line ~~44~~45 – Total Investment in Parent

Report the amount of investments reported in Lines 38 to ~~42~~43 above that are in an immediate or indirect parent.

Line ~~45~~46 – Percentage of Investments in Parent, Subsidiaries, and Affiliates to Surplus as Regards to Policyholders

All years Line ~~43~~44 divided by Page 3, Line 32, Column 1 x 100.0

***** Drafting Note – Renumber remaining lines in instructions. *****

ANNUAL STATEMENT BLANK – HEALTH

FIVE-YEAR HISTORICAL DATA

| | 1 2026 | 2 2025 | 3 2024 | 4 2023 | 5 2022 |
|--|-----------|-----------|-----------|-----------|-----------|
| Balance Sheet (Pages 2 and 3) | | | | | |
| 1. Total admitted assets (Page 2, Line 28) | | | | | |
| 2. Total liabilities (Page 3, Line 24) | | | | | |
| 3. Statutory minimum capital and surplus requirement..... | | | | | |
| 4. Total capital and surplus (Page 3, Line 33) | | | | | |
| Income Statement (Page 4) | | | | | |
| 5. Total revenues (Line 8)..... | | | | | |
| 6. Total medical and hospital expenses (Line 18) | | | | | |
| 7. Claims adjustment expenses (Line 20) | | | | | |
| 8. Total administrative expenses (Line 21) | | | | | |
| 9. Net underwriting gain (loss) (Line 24) | | | | | |
| 10. Net investment gain (loss) (Line 27) | | | | | |
| 11. Total other income (Lines 28 plus 29) | | | | | |
| 12. Net income or (loss) (Line 32) | | | | | |
| Cash Flow (Page 6) | | | | | |
| 13. Net cash from operations (Line 11)..... | | | | | |
| Risk-Based Capital Analysis | | | | | |
| 14. Total adjusted capital..... | | | | | |
| 15. Authorized control level risk-based capital | | | | | |
| Enrollment (Exhibit 1) | | | | | |
| 16. Total members at end of period (Column 5, Line 7) | | | | | |
| 17. Total members months (Column 6, Line 7) | | | | | |
| Operating Percentage (Page 4) (Item divided by Page 4, sum of Lines 2, 3, and 5) x 100.0 | | | | | |
| 18. Premiums earned plus risk revenue (Line 2 plus Lines 3 and 5).... | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| 19. Total hospital and medical plus other non-health (Lines 18 plus Line 19) | | | | | |
| 20. Cost containment expenses | | | | | |
| 21. Other claims adjustment expenses | | | | | |
| 22. Total underwriting deductions (Line 23) | | | | | |
| 23. Total underwriting gain (loss) (Line 24) | | | | | |
| Unpaid Claims Analysis (U&I Exhibit, Part 2B) | | | | | |
| 24. Total claims incurred for prior years (Line 17, Col. 5) | | | | | |
| 25. Estimated liability of unpaid claims-[prior year (Line 17, Col. 6)]... | | | | | |
| Investments in Parent, Subsidiaries and Affiliates | | | | | |
| 26. Affiliated bonds (Sch. D Summary, Line 9 + 15, Col. 1) | | | | | |
| 27. Affiliated preferred stocks (Sch. D Summary, Line 22, Col. 1)..... | | | | | |
| 28. Affiliated common stocks (Sch. D Summary, Line 28, Col. 1)..... | | | | | |
| 29. <u>Affiliated short-term investments and cash equivalent (Sch. DA Pt.</u> <u>1, Line 7699999999, Col. 6 and Sch. E Pt 2, Line 8599999999, Col.</u> <u>7)</u> | | | | | |
| 29 30. Affiliated mortgage loans on real estate | | | | | |
| 30 31. All other affiliated | | | | | |
| 31 32. Total of above Lines 26 to 30 31 | | | | | |
| 32 33. Total investment in parent included in Lines 26 to 30 31 above. | | | | | |

NOTE: If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3—Accounting Changes and Corrections of Errors? Yes [] No []
 If no, please explain

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e., 17.6
\$000 omitted for amounts of life insurance

| | 1 2026 | 2 2025 | 3 2024 | 4 2023 | 5 2022 |
|--|-----------|-----------|-----------|-----------|-----------|
| Life Insurance in Force | | | | | |
| (Exhibit of Life Insurance) | | | | | |
| 1. Ordinary-whole life and endowment (Line 34, Col. 4)..... | | | | | |
| 2. Ordinary-term (Line 21, Col. 4, less Line 34, Col. 4)..... | | | | | |
| 3. Credit life (Line 21, Col. 6)..... | | | | | |
| 4. Group, excluding FEGLI/SGLI (Line 21, Col. 9 less Lines 43 & 44, Col. 4)..... | | | | | |
| 5. Industrial (Line 21, Col. 2)..... | | | | | |
| 6. FEGLI/SGLI (Lines 43 & 44, Col. 4)..... | | | | | |
| 7. Total (Line 21, Col. 10)..... | | | | | |
| 7.1 Total in force for which VM-20 deterministic/stochastic reserves are calculated..... | | | | | |
| New Business Issued | | | | | |
| (Exhibit of Life Insurance) | | | | | |
| 8. Ordinary-whole life and endowment (Line 34, Col. 2)..... | | | | | |
| 9. Ordinary-term (Line 2, Col. 4, less Line 34, Col. 2)..... | | | | | |
| 10. Credit life (Line 2, Col. 6)..... | | | | | |
| 11. Group (Line 2, Col. 9)..... | | | | | |
| 12. Industrial (Line 2, Col. 2)..... | | | | | |
| 13. Total (Line 2, Col. 10)..... | | | | | |
| Premium Income-Lines of Business | | | | | |
| (Exhibit 1 – Part 1) | | | | | |
| 14. Individual life (Line 20.4, Col. 2)..... | | | | | |
| 15. Group life (Line 20.4, Col. 3)..... | | | | | |
| 16. Individual annuities (Line 20.4, Col. 4)..... | | | | | |
| 17. Group annuities (Line 20.4, Col. 5)..... | | | | | |
| 18. Accident & Health (Line 20.4, Col. 6)..... | | | | | |
| 19. Other lines of business (Line 20.4, Col. 8)..... | | | | | |
| 20. Total | | | | | |
| Balance Sheet | | | | | |
| (Pages 2 and 3) | | | | | |
| 21. Total admitted assets excluding Separate Accounts business (Page 2, Line 26, Col. 3)..... | | | | | |
| 22. Total liabilities excluding Separate Accounts business (Page 3, Line 26)..... | | | | | |
| 23. Aggregate life reserves (Page 3, Line 1)..... | | | | | |
| 23.1 Excess VM-20 deterministic/stochastic reserve over NPR related to Line 7.1..... | | | | | |
| 24. Aggregate A & H reserves (Page 3, Line 2)..... | | | | | |
| 25. Deposit-type contract funds (Page 3, Line 3)..... | | | | | |
| 26. Asset valuation reserve (Page 3, Line 24.01)..... | | | | | |
| 27. Capital (Page 3, Lines 29 & 30)..... | | | | | |
| 28. Surplus (Page 3, Line 37)..... | | | | | |
| Cash Flow | | | | | |
| (Page 5) | | | | | |
| 29. Net cash from operations (Line 11)..... | | | | | |
| Risk-Based Capital Analysis | | | | | |
| 30. Total adjusted capital..... | | | | | |
| 31. Authorized control level risk-based capital..... | | | | | |
| Percentage Distribution of Cash, Cash Equivalents and Invested Assets | | | | | |
| (Page 2, Col. 3) (Line No./Page 2, Line 12, Col. 3) x 100.0 | | | | | |
| 32. Bonds (Line 1)..... | | | | | |
| 33. Stocks (Lines 2.1 and 2.2)..... | | | | | |
| 34. Mortgage loans on real estate (Lines 3.1 and 3.2)..... | | | | | |
| 35. Real estate (Lines 4.1, 4.2 and 4.3)..... | | | | | |
| 36. Cash, cash equivalents and short-term investments (Line 5)..... | | | | | |
| 37. Contract loans (Line 6)..... | | | | | |
| 38. Derivatives (Page 2, Line 7)..... | | | | | |
| 39. Other invested assets (Line 8)..... | | | | | |
| 40. Receivables for securities (Line 9)..... | | | | | |
| 41. Securities lending reinvested collateral assets (Line 10)..... | | | | | |
| 42. Aggregate write-ins for invested assets (Line 11)..... | | | | | |
| 43. Cash, cash equivalents and invested assets (Line 12) | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Investments in Parent, Subsidiaries and Affiliates | | | | | |
| 44. Affiliated bonds (Sch. D Summary, Line 9 + 15, Col. 1)..... | | | | | |
| 45. Affiliated preferred stocks (Sch. D Summary, Line 22, Col. 1)..... | | | | | |
| 46. Affiliated common stocks (Sch. D Summary, Line 28, Col. 1)..... | | | | | |
| 47. <u>Affiliated short-term investments and cash equivalents (Sch. DA Pt. 1, Line 7699999999, Col. 6 and Sch. E Pt 2, Line 8599999999, Col. 7).....</u> | | | | | |
| 47 48. Affiliated mortgage loans on real estate..... | | | | | |
| 48 49. All other affiliated..... | | | | | |
| 49 50. Total of above Lines 44 to 48 49..... | | | | | |
| 50 51. Total investment in parent included in Lines 44 to 48 49 above | | | | | |

***** Drafting Note – Renumber remaining lines in blank. *****

ANNUAL STATEMENT BLANK – PROPERTY

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e., 17.6.

| | 1 2026 | 2 2025 | 3 2024 | 4 2023 | 5 2022 |
|---|-----------|-----------|-----------|-----------|-----------|
| Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 & 3) | | | | | |
| 1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4) | | | | | |
| 2. Property lines (Lines 1, 2, 9, 12, 21 & 26)..... | | | | | |
| 3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)..... | | | | | |
| 4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | | | | | |
| 5. Nonproportional reinsurance lines (Lines 31, 32 & 33)..... | | | | | |
| 6. Total (Line 35)..... | | | | | |
| Net Premiums Written (Page 8, Part 1B, Col. 6) | | | | | |
| 7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3,19.4) | | | | | |
| 8. Property lines (Lines 1, 2, 9, 12, 21 & 26)..... | | | | | |
| 9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)..... | | | | | |
| 10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | | | | | |
| 11. Nonproportional reinsurance lines (Lines 31, 32 & 33) | | | | | |
| 12. Total (Line 35)..... | | | | | |
| Statement of Income (Page 4) | | | | | |
| 13. Net underwriting gain (loss) (Line 8)..... | | | | | |
| 14. Net investment gain (loss) (Line 11)..... | | | | | |
| 15. Total other income (Line 15)..... | | | | | |
| 16. Dividends to policyholders (Line 17) | | | | | |
| 17. Federal and foreign income taxes incurred (Line 19) | | | | | |
| 18. Net income (Line 20) | | | | | |
| Balance Sheet Lines (Pages 2 and 3) | | | | | |
| 19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3)..... | | | | | |
| 20. Premiums and considerations (Page 2, Col. 3) | | | | | |
| 20.1 In course of collection (Line 15.1)..... | | | | | |
| 20.2 Deferred and not yet due (Line 15.2)..... | | | | | |
| 20.3 Accrued retrospective premiums (Line 15.3)..... | | | | | |
| 21. Total liabilities excluding protected cell business (Page 3, Line 26) | | | | | |
| 22. Losses (Page 3, Line 1) | | | | | |
| 23. Loss adjustment expenses (Page 3, Line 3) | | | | | |
| 24. Unearned premiums (Page 3, Line 9)..... | | | | | |
| 25. Capital paid up (Page 3, Lines 30 & 31)..... | | | | | |
| 26. Surplus as regards policyholders (Page 3, Line 37)..... | | | | | |
| Cash Flow (Page 5) | | | | | |
| 27. Net cash from operations (Line 11) | | | | | |
| Risk-Based Capital Analysis | | | | | |
| 28. Total adjusted capital | | | | | |
| 29. Authorized control level risk-based capital..... | | | | | |
| Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0 | | | | | |
| 30. Bonds (Line 1)..... | | | | | |
| 31. Stocks (Lines 2.1 & 2.2)..... | | | | | |
| 32. Mortgage loans on real estate (Lines 3.1 and 3.2) | | | | | |
| 33. Real estate (Lines 4.1, 4.2 & 4.3)..... | | | | | |
| 34. Cash, cash equivalents and short-term investments (Line 5) | | | | | |
| 35. Contract loans (Line 6)..... | | | | | |
| 36. Derivatives (Line 7) | | | | | |
| 37. Other invested assets (Line 8)..... | | | | | |
| 38. Receivables for securities (Line 9)..... | | | | | |
| 39. Securities lending reinvested collateral assets (Line 10) | | | | | |
| 40. Aggregate write-ins for invested assets (Line 11) | | | | | |
| 41. Cash, cash equivalents and invested assets (Line 12)..... | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Investments in Parent, Subsidiaries and Affiliates | | | | | |
| 42. Affiliated bonds, (Sch. D, Summary, Line 9 + 15, Col. 1)..... | | | | | |
| 43. Affiliated preferred stocks (Sch. D, Summary, Line 22, Col. 1) | | | | | |
| 44. Affiliated common stocks (Sch. D, Summary, Line 28, Col. 1)..... | | | | | |
| 45. <u>Affiliated short-term investments and cash equivalents (Sch. DA Pt. 1, Line 7699999999, Col. 6 and Sch. E Pt 2, Line 8599999999, Col. 7).....</u> | | | | | |
| 4546. Affiliated mortgage loans on real estate..... | | | | | |
| 4647. All other affiliated..... | | | | | |
| 4748. Total of above Lines 42 to 4647..... | | | | | |
| 4849. Total investment in parent included in Lines 42 to 4647 above..... | | | | | |
| 4950. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 4748 above divided by Page 3, Col. 1, Line 37 x 100.0) | | | | | |

***** Drafting Note – Renumber remaining lines in blank. *****

ANNUAL STATEMENT BLANK – TITLE

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

| | 1 2026 | 2 2025 | 3 2024 | 4 2023 | 5 2022 |
|---|-----------|-----------|-----------|-----------|-----------|
| Source of Direct Title Premiums Written (Part 1A) | | | | | |
| 1. Direct operations (Part 1A, Line 1, Col. 1) | | | | | |
| 2. Non-affiliated agency operations (Part 1A, Line 1, Col. 2) | | | | | |
| 3. Affiliated agency operations (Part 1A, Line 1, Col. 3) | | | | | |
| 4. Total | | | | | |
| Operating Income Summary (Page 4 & Part 1) | | | | | |
| 5. Premiums earned (Part 1B, Line 3) | | | | | |
| 6. Escrow and settlement service charges (Part 1A, Line 2) | | | | | |
| 7. Title examinations (Part 1A, Line 3) | | | | | |
| 8. Searches and abstracts (Part 1A, Line 4) | | | | | |
| 9. Surveys (Part 1A, Line 5) | | | | | |
| 10. Aggregate write-ins for service charges (Part 1A, Line 6) | | | | | |
| 11. Other operating income (Page 4, Line 2) | | | | | |
| 12. Total operating income (Page 4, Line 3) | | | | | |
| Statement of Income (Page 4) | | | | | |
| 13. Net operating gain or (loss) (Line 8) | | | | | |
| 14. Net investment gain or (loss) (Line 11) | | | | | |
| 15. Total other income (Line 12) | | | | | |
| 16. Federal and foreign income taxes incurred (Line 14) | | | | | |
| 17. Net income (Line 15) | | | | | |
| Balance Sheet (Pages 2 and 3) | | | | | |
| 18. Title insurance premiums and fees receivable (Page 2, Line 15, Col. 3) | | | | | |
| 19. Total admitted assets excluding segregated accounts (Page 2, Line 26, Col. 3) | | | | | |
| 20. Known claims reserve (Page 3, Line 1) | | | | | |
| 21. Statutory premium reserve (Page 3, Line 2) | | | | | |
| 22. Total liabilities (Page 3, Line 23) | | | | | |
| 23. Capital paid up (Page 3, Lines 25 + 26) | | | | | |
| 24. Surplus as regards policyholders (Page 3, Line 32) | | | | | |
| Cash Flow (Page 5) | | | | | |
| 25. Net cash from operations (Line 11) | | | | | |
| Percentage Distribution of Cash, Cash-Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0 | | | | | |
| 26. Bonds (Line 1) | | | | | |
| 27. Stocks (Lines 2.1 & 2.2) | | | | | |
| 28. Mortgage loans on real estate (Line 3.1 and 3.2) | | | | | |
| 29. Real estate (Lines 4.1, 4.2 & 4.3) | | | | | |
| 30. Cash, cash equivalents and short-term investments (Line 5) | | | | | |
| 31. Contract loans (Line 6) | | | | | |
| 32. Derivatives (Line 7) | | | | | |
| 33. Other invested assets (Line 8) | | | | | |
| 34. Receivable for securities (Line 9) | | | | | |
| 35. Securities lending reinvested collateral assets (Line 10) | | | | | |
| 36. Aggregate write-ins for invested assets (Line 11) | | | | | |
| 37. Subtotals cash, cash equivalents and invested assets (Line 12) | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Investments in Parent, Subsidiaries and Affiliates | | | | | |
| 38. Affiliated bonds (Sch. D Summary, Line 9 + 15, Col. 1) | | | | | |
| 39. Affiliated preferred stocks (Sch. D, Summary, Line 22, Col. 1) | | | | | |
| 40. Affiliated common stocks (Sch. D, Summary, Line 28, Col. 1) | | | | | |
| 41. <u>Affiliated short-term investments and cash equivalents (Sch. DA Pt. 1, Line 7699999999, Col. 6 and Sch. E Pt 2, Line 8599999999, Col. 7)</u> | | | | | |
| 4442. Affiliated mortgage loans on real estate | | | | | |
| 4243. All other affiliated | | | | | |
| 4344. Total of above Lines 38 to 4243 | | | | | |
| 4445. Total investment in parent included in Lines 38 to 4243 above | | | | | |

4546. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line ~~43-44~~ above divided by Page 3, Line 32, Col. 1 x 100.0)

| | | | | |
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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

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| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-10BWG</u> Year <u>2026</u> Changes to Existing Reporting <input type="checkbox"/> [X] New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input type="checkbox"/> [X] Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No] ***If Yes, complete question below***</p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment <input type="checkbox"/> [] Referred To Another NAIC Group <input checked="" type="checkbox"/> [X] Received For Public Comment <input type="checkbox"/> [] Adopted Date _____ <input type="checkbox"/> [] Rejected Date _____ <input type="checkbox"/> [] Deferred Date _____ <input type="checkbox"/> [] Other (Specify) _____</p> |
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BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input checked="" type="checkbox"/> [X] CROSSCHECKS |
| <input checked="" type="checkbox"/> [X] QUARTERLY STATEMENT | <input type="checkbox"/> [] BLANK | |
| <input checked="" type="checkbox"/> [X] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input type="checkbox"/> [] Title |
| <input type="checkbox"/> [] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input type="checkbox"/> [] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2026/2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Life/Fraternal Liability Lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value and an annual crosscheck to Schedule S. Also add reference to use the book/adjusted carrying value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is address inconsistent guidance regarding the valuation of the liability for funds withheld in a life or health reinsurance agreement. (SAPWG Ref. 2026-02)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

SCHEDULE S – PART 3 – SECTION 1

REINSURANCE CEDED LIFE INSURANCE, ANNUITIES, DEPOSIT FUNDS, AND OTHER LIABILITIES WITHOUT LIFE OR DISABILITY CONTINGENCIES, AND RELATED BENEFITS LISTED BY REINSURING COMPANY AS OF DECEMBER 31, CURRENT YEAR

**=====
Detail Eliminated To Conserve Space
=====**

Column 15 – Funds Withheld Under Coinsurance

Report the book/adjusted carrying value of the amount of funds withheld on coinsurance contracts.

SCHEDULE S – PART 3 – SECTION 2

REINSURANCE CEDED ACCIDENT AND HEALTH INSURANCE LISTED BY REINSURING COMPANY
AS OF DECEMBER 31, CURRENT YEAR

↓ **====** **Detail Eliminated To Conserve Space** **====** ↓

Column 14 – Funds Withheld Under Coinsurance

Report the book/adjusted carrying value of the amount of funds withheld on coinsurance contracts.

SCHEDULE S – PART 4

REINSURANCE CEDED TO UNAUTHORIZED COMPANIES



Column 12 – Funds Deposited By and Withheld From Reinsurers

Include: Where permissible to be taken as credit against the loss and reserve liabilities in Column 8, amounts deposited by the reinsurer with or for the reporting insurance company, letters of credit, and trust agreements. Securities withheld from the reinsurer or held on deposit should be valued at the book/adjusted carrying value of the funds held by the ceding entity. ~~or Funds held in a trust fund should be valued at fair market value.~~

~~NAIC published market values must be used when available.~~ Letters of credit and trust agreements are not to be included in assets or liabilities on Pages 2 or 3 or supporting pages and exhibits.

SCHEDULE S – PART 5

REINSURANCE CEDED TO CERTIFIED REINSURERS



Detail Eliminated To Conserve Space



Column 20 – Funds Deposited by and Withheld from Reinsurers

Include:

Where permissible to be taken as credit against the loss and reserve liabilities in Column 14, amounts deposited by the reinsurer with or for the reporting insurance company, letters of credit, and trust agreements. Securities withheld from the reinsurer or held on deposit should be valued at the book adjusted carrying value of the funds held by the ceding entity. ~~or Funds held in a trust fund should be valued at fair market value.~~

~~NAIC published market values must be used when available.~~ Letters of credit and trust agreements are not to be included in assets or liabilities on Pages 2 or 3 or supporting pages and exhibits.

QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

LIABILITIES, SURPLUS AND OTHER FUNDS

Information should be reported as of the end of current quarter.

↑ ════════════════════════ **Detail Eliminated To Conserve Space** ════════════════════════ **↓**

Line 24.03 – Funds Held Under Reinsurance Treaties with Unauthorized and Certified Reinsurers

Report the total book/adjusted carrying value of the funds withheld assets for unauthorized and certified reinsurers.

↓ ════════════════════════ **Detail Eliminated To Conserve Space** ════════════════════════ **↑**

Line 24.07 – Funds Held Under Coinsurance

Report the amount of funds withheld from reinsurers under coinsurance treaties other than amounts reported on Line 24.03. Report the total amount of the book/adjusted carrying value of the funds withheld assets (for amounts not related to unauthorized or certified reinsurers).

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NAIC BLANKS (E) WORKING GROUP

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| <p style="text-align: right;">DATE: <u>3/26/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-11BWG</u> Year <u>2026</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [X] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
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BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Notes to Financials Note 5A – Mortgage Loans by adding a paragraph to disclose mortgage loans acquired through a qualifying investment in a qualifying statutory trust.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is update Notes to Financials with the new disclosure in SSAP No. 37 – Mortgage Loans. (SAPWG Ref. 2025-13)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5 - Investments****Note 5A – Instruction:**

- A. Mortgage Loans, including Mezzanine Real Estate Loans

For mortgage loans, disclose the following information:

**Detail Eliminated To Conserve Space**

- (9) The policy for recognizing interest income on impaired loans, including the method for recording cash receipts.
- (10) The following disclosures shall be made for mortgage loans acquired through a qualifying investment in a qualifying statutory trust:
- a. A description of the qualifying statutory trust(s). Mortgage loans held in qualifying statutory trusts must be separately reported on Schedule B in accordance with the annual statement instructions.
 - If the qualifying statutory trust(s) holds any amount of subprime mortgages, the reporting entity must disclose this fact in the description of the qualifying statutory trust(s) and complete the subprime mortgage disclosures as detailed in SSAP No. 1—Accounting Policies, Risks & Uncertainties, and Other Disclosures. Transactions of the qualifying statutory trusts within the scope of SSAP No. 25 shall also be disclosed.
 - The description of each qualifying statutory trust must specify its state of domicile as well as each U.S. state and/or foreign country, if applicable, in which the qualifying statutory trust holds residential mortgage loans.
 - Summary of assets and liabilities held within qualifying statutory trusts; aggregated by total residential mortgage loans, real estate acquired through foreclosure, cash and cash equivalents, and liabilities (if any) to be shown by reporting line.
 - b. Disclosure of material litigation and any kind of material state or federal regulatory review and/or action concerning the qualifying statutory trust(s).
 - c. Disclosure of financing transactions of any sort which are secured, directly or indirectly, by statutory trust assets.
 - d. Total of residential mortgages held in qualifying statutory trusts, disaggregated by loan standing: In Good Standing, Restructured, Overdue Interest Over 90 Days Not in the Process of Foreclosure, and In the Process of Foreclosure.

Note 5A – Illustration:

A. Mortgage Loans, including Mezzanine Real Estate Loans



Detail Eliminated To Conserve Space



(9) The company recognizes interest income on its impaired loans upon receipt.

(10) The following disclosures shall be made for mortgage loans acquired through a qualifying investment in a qualifying statutory trust:

a. The reporting entity holds one qualifying statutory trust captured in SSAP No. 37, with the mortgage loans within the trust individually reported on Schedule B. The statutory trust is domiciled in Delaware and holds residential mortgage loans for properties located in Florida and Georgia. The qualifying statutory trust includes \$1.3 million of residential mortgage loans and does not include any foreclosed real estate or cash or cash equivalents.

b. There are no material litigations concerning the qualifying statutory trust.

c. The reporting entity has pledged residential mortgage loans held in the qualifying statutory trust to the Federal Home Loan Bank under their FHLB borrowing agreement. These pledged assets are captured in the restricted asset note (Note 5L) as well as the FHLB note (Note 11B).

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLES (5A(10)d) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THESE ILLUSTRATIONS.

d. Total of residential mortgages held in qualifying statutory trusts, disaggregated by loan standing:

| <u>In Good Standing</u> | <u>Restructured</u> | <u>Overdue Interest Over 90 Days Not in the Process of Foreclosure</u> | <u>In the Process of Foreclosure</u> |
|-------------------------|---------------------|--|--------------------------------------|
| \$ _____ | \$ _____ | \$ _____ | \$ _____ |

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| <p style="text-align: right;">DATE: <u>4/20/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Ben Slutsker</u></p> <p>TITLE: <u>Life RBC Chair</u></p> <p>AFFILIATION: <u>MN Department of Commerce</u></p> <p>ADDRESS: _____</p> <p>_____</p> | <p style="text-align: center;"><u>FOR NAIC USE ONLY</u></p> <p>Agenda Item # <u>2026-12BWG</u></p> <p>Year <u>2026</u></p> <p>Changes to Existing Reporting [X]</p> <p>New Reporting Requirement []</p> <hr/> <p style="text-align: center;"><u>REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</u></p> <p>No Impact [X]</p> <p>Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;"><u>DISPOSITION</u></p> <p>[] Rejected For Public Comment</p> <p>[] Referred To Another NAIC Group</p> <p>[X] Received For Public Comment</p> <p>[] Adopted Date _____</p> <p>[] Rejected Date _____</p> <p>[] Deferred Date _____</p> <p>[] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input type="checkbox"/> Title |
| <input type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the AVR factors to zero in columns 7 and 9 for the Collateral Loan section.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

This proposal was prepared to update the collateral loan factors for Reserve Objective and Maximum Reserve to be zero. These should have been set at zero when the collateral loan section was added in 2025.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments: _____

** This section must be completed on all forms.

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL AND SEPARATE ACCOUNTS

**ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT**

| Line Number | NAIC Designation | Description | 1 Book/ Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1+2+3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|------------------------------|------------------|--|---|--|---|--|--------------------|----------------------------|-------------------|----------------------------|-------------------|-----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4x5) | 7 Factor | 8 Amount (Cols. 4x7) | 9 Factor | 10 Amount (Cols. 4x9) |
| COLLATERAL LOANS | | | | | | | | | | | | |
| 100 | | Backed by mortgage loans – collateral loans – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 101 | | Backed by mortgage loans – collateral loans – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 102 | | Backed by joint ventures, partnerships, & limited liability companies – collateral loans – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 103 | | Backed by joint ventures, partnerships, & limited liability companies – collateral loans – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 104 | | Backed by residual tranches or interests – collateral loans – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 105 | | Backed by residual tranches or interests – collateral loans – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 106 | | Backed by debt securities – collateral loans – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 107 | | Backed by debt securities – collateral loans – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 108 | | Backed by real estate – collateral loans – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 109 | | Backed by real estate – collateral loans – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 110 | | Collateral loans – all other – unaffiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 111 | | Collateral loans – all other – affiliated | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 112 | | Total collateral loans (Sum of Lines 100 through 111) | | XXX | XXX | | XXX | | XXX | | XXX | |
| ALL OTHER INVESTMENTS | | | | | | | | | | | | |
| 113 | | NAIC 1 working capital finance investments | | XXX | | | 0.0000 | | 0.0042 | | 0.0042 | |
| 114 | | NAIC 2 working capital finance investments | | XXX | | | 0.0000 | | 0.0137 | | 0.0137 | |
| 115 | | Other invested assets - Schedule BA | | XXX | | | 0.0000 | | 0.1580 | | 0.1580 | |
| 116 | | Other short-term invested assets - Schedule DA | | XXX | | | 0.0000 | | 0.1580 | | 0.1580 | |
| 117 | | Total all other (Sum of Lines 113 through 116) | | XXX | | | XXX | | XXX | | XXX | |
| 118 | | Total other invested assets - Schedules BA & DA (Sum of Lines 29, 37, 64, 70, 74, 79, 92, 99 112, and 117) | | | | | XXX | | XXX | | XXX | |

- (a) Times the company's weighted average portfolio beta (Minimum .1215, Maximum .2431).
- (b) This will be the factor associated with the risk category determined in the company generated worksheet.

*****Drafting Note: Changes in Blanks Proposal 2025-27BWG for AVR – CLO reporting are not shown on this proposal. Line numbers for AVR reporting are being updated in Blanks Proposal 2025-27BWG.*****

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|---|
| <p style="text-align: right;">DATE: <u>5/4/2026</u></p> <p>CONTACT PERSON: <u>Andy Daleo</u></p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: <u>adaleo@naic.org</u></p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Eli Snowbarger</u></p> <p>TITLE: <u>Chief Financial Examiner</u></p> <p>AFFILIATION: <u>Oklahoma Insurance Department</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-13BWG</u></p> <p>Year <u>2027</u></p> <p>Changes to Existing Reporting <input checked="" type="checkbox"/> [X]</p> <p>New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input checked="" type="checkbox"/> [X]</p> <p>Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [NO]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment</p> <p><input type="checkbox"/> [] Referred To Another NAIC Group</p> <p><input type="checkbox"/> [] Received For Public Comment</p> <p><input type="checkbox"/> [] Adopted Date _____</p> <p><input type="checkbox"/> [] Rejected Date _____</p> <p><input type="checkbox"/> [] Deferred Date _____</p> <p><input type="checkbox"/> [] Other (Specify) _____</p> |
|--|---|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input type="checkbox"/> [] CROSSCHECKS |
| <input type="checkbox"/> [] QUARTERLY STATEMENT | <input checked="" type="checkbox"/> [X] BLANK | |
| <input type="checkbox"/> [] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input type="checkbox"/> [] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input type="checkbox"/> [] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Add an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of the addition of the "Active Status" column to the cyber and flood supplements is to allow a user to determine if the policies are being written in the admitted or nonadmitted market.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY

CYBERSECURITY INSURANCE COVERAGE SUPPLEMENT
PART 5 – CYBERSECURITY COVERAGE BY STATE

If the reporting entity answers “yes” to Question 4, then Part 5 should be completed. Part 5 should report which state(s) cybersecurity coverage have direct written premium as reported in Parts 2, 3, and 4. No field should be left blank in the table. (Note: Column 1-2 – Stand-alone and Column 2-3 – Packaged are considered Primary but on Part 5 they are listed separately to see what type of policies are being written.)

Column 1 – Active Status

Use the following codes to identify the reporting entity’s status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity’s status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

- L – Licensed or Chartered (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.)
- R – Registered (Non-domiciled Risk Retention Groups)
- E – Eligible (Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile – see DSLI). In some states referred to as nonadmitted.)
- Q – Qualified (Qualified or Accredited Reinsurer)
- D – DSLI (Domestic Surplus Lines Insurer (DSLI) – Reporting Entities authorized to write Surplus Lines in the state of domicile)
- S – Suspended (State licensing status of final and public suspension)
- N – None of the above (Not allowed to write business in the state or none of the above codes apply)

Column 1-2 – Stand-alone

If Part 2 is completed, indicate “Yes” in each state’s row that has direct written premium reported in Part 2 from cybersecurity coverage issued as a stand-alone policy without additional coverage types (e.g., monoline, non-packed). Otherwise, indicate “No” for each state. Or, if all Part 2 direct written premiums are Packaged (column 2 below), indicate “N/A” for each state.



*****Drafting Note – Renumber all remaining columns*****

PRIVATE FLOOD INSURANCE SUPPLEMENT

GENERAL INSTRUCTIONS – PARTS 2 THROUGH 6

Column 1 – Active Status

Use the following codes to identify the reporting entity’s status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity’s status in the state or territory. Each line must have an entry in order to subtotal Footnote (a).

L – Licensed or Chartered (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.)

R – Registered (Non-domiciled Risk Retention Groups)

E – Eligible (Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile – see DSLI). In some states referred to as nonadmitted.)

Q – Qualified (Qualified or Accredited Reinsurer)

D – DSLI (Domestic Surplus Lines Insurer (DSLI) – Reporting Entities authorized to write Surplus Lines in the state of domicile)

S – Suspended (State licensing status of final and public suspension)

N – None of the above (Not allowed to write business in the state or none of the above codes apply)

Column 1 – Direct Written Premium

For Lines 1 through 56, the sum of Parts 2 through 6 should equal Column 1, Line 2.5 of the corresponding Exhibit of Premiums and Losses (State Page) for the state.

For Line 57, the sum of Parts 2 through 6 should equal Column 1, Line 2.5 of the Exhibit of Premiums and Losses (State Page) – Grand Total.



*****Drafting Note – Renumber all remaining columns*****

**ANNUAL STATEMENT BLANK - PROPERTY
CYBERSECURITY INSURANCE COVERAGE SUPPLEMENT**

PART 5 – CYBERSECURITY COVERAGE BY STATE

| State | <u>1</u> Active Status | <u>12</u> Stand-Alone | <u>23</u> Packaged | <u>34</u> Excess | <u>45</u> Endorsement |
|---------------------------------------|---------------------------|--------------------------|-----------------------|---------------------|--------------------------|
| 1. Alabama AL | | | | | |
| 2. Alaska AK | | | | | |
| 3. Arizona AZ | | | | | |
| 4. Arkansas AR | | | | | |
| 5. California CA | | | | | |
| 6. Colorado CO | | | | | |
| 7. Connecticut CT | | | | | |
| 8. Delaware DE | | | | | |
| 9. Dist. Columbia DC | | | | | |
| 10. Florida FL | | | | | |
| 11. Georgia GA | | | | | |
| 12. Hawaii HI | | | | | |
| 13. Idaho ID | | | | | |
| 14. Illinois IL | | | | | |
| 15. Indiana IN | | | | | |
| 16. Iowa IA | | | | | |
| 17. Kansas KS | | | | | |
| 18. Kentucky KY | | | | | |
| 19. Louisiana LA | | | | | |
| 20. Maine ME | | | | | |
| 21. Maryland MD | | | | | |
| 22. Massachusetts MA | | | | | |
| 23. Michigan MI | | | | | |
| 24. Minnesota MN | | | | | |
| 25. Mississippi MS | | | | | |
| 26. Missouri MO | | | | | |
| 27. Montana MT | | | | | |
| 28. Nebraska NE | | | | | |
| 29. Nevada NV | | | | | |
| 30. New Hampshire NH | | | | | |
| 31. New Jersey NJ | | | | | |
| 32. New Mexico NM | | | | | |
| 33. New York NY | | | | | |
| 34. No. Carolina NC | | | | | |
| 35. No. Dakota ND | | | | | |
| 36. Ohio OH | | | | | |
| 37. Oklahoma OK | | | | | |
| 38. Oregon OR | | | | | |
| 39. Pennsylvania PA | | | | | |
| 40. Rhode Island RI | | | | | |
| 41. So. Carolina SC | | | | | |
| 42. So. Dakota SD | | | | | |
| 43. Tennessee TN | | | | | |
| 44. Texas TX | | | | | |
| 45. Utah UT | | | | | |
| 46. Vermont VT | | | | | |
| 47. Virginia VA | | | | | |
| 48. Washington WA | | | | | |
| 49. West Virginia WV | | | | | |
| 50. Wisconsin WI | | | | | |
| 51. Wyoming WY | | | | | |
| 52. American Samoa AS | | | | | |
| 53. Guam GU | | | | | |
| 54. Puerto Rico PR | | | | | |
| 55. U.S. Virgin Islands VI | | | | | |
| 56. Northern Mariana Islands MP | | | | | |
| 57. Canada CAN | | | | | |
| 58. Aggregate other alien OT | | | | | |

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 2
Stand-Alone Residential Private Flood Policies – First-Dollar
Policy and Claims Data

| States, Etc. | 1 Active Status | 2 Direct Written Premium | 3 Direct Premium Earned | Direct Losses | | | Defense and Cost Containment Expense | | | 910 Number of Policies In Force End of the Prior Year | 1011 Number of Policies In Force End of the Current Year | 1112 Number of Claims Open Beginning of the Current Year | 1213 Number of Claims Opened During the Reporting Year | 1314 Number of Claims Open the End of Current Year | 1415 Number of Claims Closed with Payment |
|---------------------------------------|--------------------|-----------------------------|----------------------------|-------------------------------|-------------------------------------|--------------------|--------------------------------------|-------------------------------------|--------------------|--|---|---|---|---|--|
| | | | | 4 Paid (Deducting Salvage) | 5 Paid + Change in Case Reserves | 6 Case Reserves | 7 Paid | 8 Paid + Change in Case Reserves | 9 Case Reserves | | | | | | |
| 1. Alabama AL | | | | | | | | | | | | | | | |
| 2. Alaska AK | | | | | | | | | | | | | | | |
| 3. Arizona AZ | | | | | | | | | | | | | | | |
| 4. Arkansas AR | | | | | | | | | | | | | | | |
| 5. California CA | | | | | | | | | | | | | | | |
| 6. Colorado CO | | | | | | | | | | | | | | | |
| 7. Connecticut CT | | | | | | | | | | | | | | | |
| 8. Delaware DE | | | | | | | | | | | | | | | |
| 9. Dist. Columbia DC | | | | | | | | | | | | | | | |
| 10. Florida FL | | | | | | | | | | | | | | | |
| 11. Georgia GA | | | | | | | | | | | | | | | |
| 12. Hawaii HI | | | | | | | | | | | | | | | |
| 13. Idaho ID | | | | | | | | | | | | | | | |
| 14. Illinois IL | | | | | | | | | | | | | | | |
| 15. Indiana IN | | | | | | | | | | | | | | | |
| 16. Iowa IA | | | | | | | | | | | | | | | |
| 17. Kansas KS | | | | | | | | | | | | | | | |
| 18. Kentucky KY | | | | | | | | | | | | | | | |
| 19. Louisiana LA | | | | | | | | | | | | | | | |
| 20. Maine ME | | | | | | | | | | | | | | | |
| 21. Maryland MD | | | | | | | | | | | | | | | |
| 22. Massachusetts MA | | | | | | | | | | | | | | | |
| 23. Michigan MI | | | | | | | | | | | | | | | |
| 24. Minnesota MN | | | | | | | | | | | | | | | |
| 25. Mississippi MS | | | | | | | | | | | | | | | |
| 26. Missouri MO | | | | | | | | | | | | | | | |
| 27. Montana MT | | | | | | | | | | | | | | | |
| 28. Nebraska NE | | | | | | | | | | | | | | | |
| 29. Nevada NV | | | | | | | | | | | | | | | |
| 30. New Hampshire NH | | | | | | | | | | | | | | | |
| 31. New Jersey NJ | | | | | | | | | | | | | | | |
| 32. New Mexico NM | | | | | | | | | | | | | | | |
| 33. New York NY | | | | | | | | | | | | | | | |
| 34. No. Carolina NC | | | | | | | | | | | | | | | |
| 35. No. Dakota ND | | | | | | | | | | | | | | | |
| 36. Ohio OH | | | | | | | | | | | | | | | |
| 37. Oklahoma OK | | | | | | | | | | | | | | | |
| 38. Oregon OR | | | | | | | | | | | | | | | |
| 39. Pennsylvania PA | | | | | | | | | | | | | | | |
| 40. Rhode Island RI | | | | | | | | | | | | | | | |
| 41. So. Carolina SC | | | | | | | | | | | | | | | |
| 42. So. Dakota SD | | | | | | | | | | | | | | | |
| 43. Tennessee TN | | | | | | | | | | | | | | | |
| 44. Texas TX | | | | | | | | | | | | | | | |
| 45. Utah UT | | | | | | | | | | | | | | | |
| 46. Vermont VT | | | | | | | | | | | | | | | |
| 47. Virginia VA | | | | | | | | | | | | | | | |
| 48. Washington WA | | | | | | | | | | | | | | | |
| 49. West Virginia WV | | | | | | | | | | | | | | | |
| 50. Wisconsin WI | | | | | | | | | | | | | | | |
| 51. Wyoming WY | | | | | | | | | | | | | | | |
| 52. American Samoa AS | | | | | | | | | | | | | | | |
| 53. Guam GU | | | | | | | | | | | | | | | |
| 54. Puerto Rico PR | | | | | | | | | | | | | | | |
| 55. U.S. Virgin Islands VI | | | | | | | | | | | | | | | |
| 56. Northern Mariana Islands MP | | | | | | | | | | | | | | | |
| 57. Totals | | | | | | | | | | | | | | | |

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 3
Stand-Alone Residential Private Flood Policies – Excess
Policy and Claims Data

| States, Etc. | 1 Active Status | 2 Direct Written Premium | 3 Direct Premium Earned | Direct Losses | | | Defense and Cost Containment Expense | | | 910 Number of Policies In Force End of the Prior Year | 1011 Number of Policies In Force End of the Current Year | 1112 Number of Claims Open Beginning of the Current Year | 1213 Number of Claims Opened During the Reporting Year | 1314 Number of Claims Open the End of Current Year | 1415 Number of Claims Closed with Payment |
|---------------------------------------|--------------------|-----------------------------|----------------------------|-------------------------------|-------------------------------------|--------------------|--------------------------------------|-------------------------------------|--------------------|--|---|---|---|---|--|
| | | | | 4 Paid (Deducting Salvage) | 5 Paid + Change in Case Reserves | 6 Case Reserves | 7 Paid | 8 Paid + Change in Case Reserves | 9 Case Reserves | | | | | | |
| 1. Alabama AL | | | | | | | | | | | | | | | |
| 2. Alaska AK | | | | | | | | | | | | | | | |
| 3. Arizona AZ | | | | | | | | | | | | | | | |
| 4. Arkansas AR | | | | | | | | | | | | | | | |
| 5. California CA | | | | | | | | | | | | | | | |
| 6. Colorado CO | | | | | | | | | | | | | | | |
| 7. Connecticut CT | | | | | | | | | | | | | | | |
| 8. Delaware DE | | | | | | | | | | | | | | | |
| 9. Dist. Columbia DC | | | | | | | | | | | | | | | |
| 10. Florida FL | | | | | | | | | | | | | | | |
| 11. Georgia GA | | | | | | | | | | | | | | | |
| 12. Hawaii HI | | | | | | | | | | | | | | | |
| 13. Idaho ID | | | | | | | | | | | | | | | |
| 14. Illinois IL | | | | | | | | | | | | | | | |
| 15. Indiana IN | | | | | | | | | | | | | | | |
| 16. Iowa IA | | | | | | | | | | | | | | | |
| 17. Kansas KS | | | | | | | | | | | | | | | |
| 18. Kentucky KY | | | | | | | | | | | | | | | |
| 19. Louisiana LA | | | | | | | | | | | | | | | |
| 20. Maine ME | | | | | | | | | | | | | | | |
| 21. Maryland MD | | | | | | | | | | | | | | | |
| 22. Massachusetts MA | | | | | | | | | | | | | | | |
| 23. Michigan MI | | | | | | | | | | | | | | | |
| 24. Minnesota MN | | | | | | | | | | | | | | | |
| 25. Mississippi MS | | | | | | | | | | | | | | | |
| 26. Missouri MO | | | | | | | | | | | | | | | |
| 27. Montana MT | | | | | | | | | | | | | | | |
| 28. Nebraska NE | | | | | | | | | | | | | | | |
| 29. Nevada NV | | | | | | | | | | | | | | | |
| 30. New Hampshire NH | | | | | | | | | | | | | | | |
| 31. New Jersey NJ | | | | | | | | | | | | | | | |
| 32. New Mexico NM | | | | | | | | | | | | | | | |
| 33. New York NY | | | | | | | | | | | | | | | |
| 34. No. Carolina NC | | | | | | | | | | | | | | | |
| 35. No. Dakota ND | | | | | | | | | | | | | | | |
| 36. Ohio OH | | | | | | | | | | | | | | | |
| 37. Oklahoma OK | | | | | | | | | | | | | | | |
| 38. Oregon OR | | | | | | | | | | | | | | | |
| 39. Pennsylvania PA | | | | | | | | | | | | | | | |
| 40. Rhode Island RI | | | | | | | | | | | | | | | |
| 41. So. Carolina SC | | | | | | | | | | | | | | | |
| 42. So. Dakota SD | | | | | | | | | | | | | | | |
| 43. Tennessee TN | | | | | | | | | | | | | | | |
| 44. Texas TX | | | | | | | | | | | | | | | |
| 45. Utah UT | | | | | | | | | | | | | | | |
| 46. Vermont VT | | | | | | | | | | | | | | | |
| 47. Virginia VA | | | | | | | | | | | | | | | |
| 48. Washington WA | | | | | | | | | | | | | | | |
| 49. West Virginia WV | | | | | | | | | | | | | | | |
| 50. Wisconsin WI | | | | | | | | | | | | | | | |
| 51. Wyoming WY | | | | | | | | | | | | | | | |
| 52. American Samoa AS | | | | | | | | | | | | | | | |
| 53. Guam GU | | | | | | | | | | | | | | | |
| 54. Puerto Rico PR | | | | | | | | | | | | | | | |
| 55. U.S. Virgin Islands VI | | | | | | | | | | | | | | | |
| 56. Northern Mariana Islands MP | | | | | | | | | | | | | | | |
| 57. Totals | | | | | | | | | | | | | | | |

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 4
Residential Private Flood Policy Endorsements – First-Dollar
Policy and Claims Data

| States, Etc. | 1 Active Status | 2 Direct Written Premium | 3 Direct Premium Earned | Direct Losses | | | Defense and Cost Containment Expense | | | 910 Number of Policies In Force End of the Prior Year | 1011 Number of Policies In Force End of the Current Year | 1112 Number of Claims Open Beginning of the Current Year | 1213 Number of Claims Opened During the Reporting Year | 1314 Number of Claims Open the End of Current Year | 1415 Number of Claims Closed with Payment |
|-------------------------------------|--------------------|-----------------------------|----------------------------|-------------------------------|-------------------------------------|--------------------|--------------------------------------|-------------------------------------|--------------------|--|---|---|---|---|--|
| | | | | 4 Paid (Deducting Salvage) | 5 Paid + Change in Case Reserves | 6 Case Reserves | 7 Paid | 8 Paid + Change in Case Reserves | 9 Case Reserves | | | | | | |
| 1. Alabama.....AL | | | | | | | | | | | | | | | |
| 2. Alaska.....AK | | | | | | | | | | | | | | | |
| 3. Arizona.....AZ | | | | | | | | | | | | | | | |
| 4. Arkansas.....AR | | | | | | | | | | | | | | | |
| 5. California.....CA | | | | | | | | | | | | | | | |
| 6. Colorado.....CO | | | | | | | | | | | | | | | |
| 7. Connecticut.....CT | | | | | | | | | | | | | | | |
| 8. Delaware.....DE | | | | | | | | | | | | | | | |
| 9. Dist. Columbia.....DC | | | | | | | | | | | | | | | |
| 10. Florida.....FL | | | | | | | | | | | | | | | |
| 11. Georgia.....GA | | | | | | | | | | | | | | | |
| 12. Hawaii.....HI | | | | | | | | | | | | | | | |
| 13. Idaho.....ID | | | | | | | | | | | | | | | |
| 14. Illinois.....IL | | | | | | | | | | | | | | | |
| 15. Indiana.....IN | | | | | | | | | | | | | | | |
| 16. Iowa.....IA | | | | | | | | | | | | | | | |
| 17. Kansas.....KS | | | | | | | | | | | | | | | |
| 18. Kentucky.....KY | | | | | | | | | | | | | | | |
| 19. Louisiana.....LA | | | | | | | | | | | | | | | |
| 20. Maine.....ME | | | | | | | | | | | | | | | |
| 21. Maryland.....MD | | | | | | | | | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | | | | | | | | | |
| 23. Michigan.....MI | | | | | | | | | | | | | | | |
| 24. Minnesota.....MN | | | | | | | | | | | | | | | |
| 25. Mississippi.....MS | | | | | | | | | | | | | | | |
| 26. Missouri.....MO | | | | | | | | | | | | | | | |
| 27. Montana.....MT | | | | | | | | | | | | | | | |
| 28. Nebraska.....NE | | | | | | | | | | | | | | | |
| 29. Nevada.....NV | | | | | | | | | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | | | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | | | | | | | | | |
| 32. New Mexico.....NM | | | | | | | | | | | | | | | |
| 33. New York.....NY | | | | | | | | | | | | | | | |
| 34. No. Carolina.....NC | | | | | | | | | | | | | | | |
| 35. No. Dakota.....ND | | | | | | | | | | | | | | | |
| 36. Ohio.....OH | | | | | | | | | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | | | | | | | | | |
| 38. Oregon.....OR | | | | | | | | | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | | | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | | | | | | | | | |
| 41. So. Carolina.....SC | | | | | | | | | | | | | | | |
| 42. So. Dakota.....SD | | | | | | | | | | | | | | | |
| 43. Tennessee.....TN | | | | | | | | | | | | | | | |
| 44. Texas.....TX | | | | | | | | | | | | | | | |
| 45. Utah.....UT | | | | | | | | | | | | | | | |
| 46. Vermont.....VT | | | | | | | | | | | | | | | |
| 47. Virginia.....VA | | | | | | | | | | | | | | | |
| 48. Washington.....WA | | | | | | | | | | | | | | | |
| 49. West Virginia.....WV | | | | | | | | | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | | | | | | | | | |
| 51. Wyoming.....WY | | | | | | | | | | | | | | | |
| 52. American Samoa.....AS | | | | | | | | | | | | | | | |
| 53. Guam.....GU | | | | | | | | | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | | | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | | | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | | | | | | | | | |
| 57. Totals | | | | | | | | | | | | | | | |

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 5
Residential Private Flood Policy Endorsements – Excess
Policy and Claims Data

| States, Etc. | 1 Active Status | 2 Direct Written Premium | 3 Direct Premium Earned | Direct Losses | | | Defense and Cost Containment Expense | | | 10 Number of Policies In Force End of the Prior Year | 11 Number of Policies In Force End of the Current Year | 12 Number of Claims Open Beginning of the Current Year | 13 Number of Claims Opened During the Reporting Year | 14 Number of Claims Open the End of Current Year | 15 Number of Claims Closed with Payment |
|-------------------------------------|--------------------|-----------------------------|----------------------------|-------------------------------|-------------------------------------|--------------------|--------------------------------------|-------------------------------------|--------------------|---|---|---|---|---|--|
| | | | | 4 Paid (Deducting Salvage) | 5 Paid + Change in Case Reserves | 6 Case Reserves | 7 Paid | 8 Paid + Change in Case Reserves | 9 Case Reserves | | | | | | |
| 1. Alabama.....AL | | | | | | | | | | | | | | | |
| 2. Alaska.....AK | | | | | | | | | | | | | | | |
| 3. Arizona.....AZ | | | | | | | | | | | | | | | |
| 4. Arkansas.....AR | | | | | | | | | | | | | | | |
| 5. California.....CA | | | | | | | | | | | | | | | |
| 6. Colorado.....CO | | | | | | | | | | | | | | | |
| 7. Connecticut.....CT | | | | | | | | | | | | | | | |
| 8. Delaware.....DE | | | | | | | | | | | | | | | |
| 9. Dist. Columbia.....DC | | | | | | | | | | | | | | | |
| 10. Florida.....FL | | | | | | | | | | | | | | | |
| 11. Georgia.....GA | | | | | | | | | | | | | | | |
| 12. Hawaii.....HI | | | | | | | | | | | | | | | |
| 13. Idaho.....ID | | | | | | | | | | | | | | | |
| 14. Illinois.....IL | | | | | | | | | | | | | | | |
| 15. Indiana.....IN | | | | | | | | | | | | | | | |
| 16. Iowa.....IA | | | | | | | | | | | | | | | |
| 17. Kansas.....KS | | | | | | | | | | | | | | | |
| 18. Kentucky.....KY | | | | | | | | | | | | | | | |
| 19. Louisiana.....LA | | | | | | | | | | | | | | | |
| 20. Maine.....ME | | | | | | | | | | | | | | | |
| 21. Maryland.....MD | | | | | | | | | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | | | | | | | | | |
| 23. Michigan.....MI | | | | | | | | | | | | | | | |
| 24. Minnesota.....MN | | | | | | | | | | | | | | | |
| 25. Mississippi.....MS | | | | | | | | | | | | | | | |
| 26. Missouri.....MO | | | | | | | | | | | | | | | |
| 27. Montana.....MT | | | | | | | | | | | | | | | |
| 28. Nebraska.....NE | | | | | | | | | | | | | | | |
| 29. Nevada.....NV | | | | | | | | | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | | | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | | | | | | | | | |
| 32. New Mexico.....NM | | | | | | | | | | | | | | | |
| 33. New York.....NY | | | | | | | | | | | | | | | |
| 34. No. Carolina.....NC | | | | | | | | | | | | | | | |
| 35. No. Dakota.....ND | | | | | | | | | | | | | | | |
| 36. Ohio.....OH | | | | | | | | | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | | | | | | | | | |
| 38. Oregon.....OR | | | | | | | | | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | | | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | | | | | | | | | |
| 41. So. Carolina.....SC | | | | | | | | | | | | | | | |
| 42. So. Dakota.....SD | | | | | | | | | | | | | | | |
| 43. Tennessee.....TN | | | | | | | | | | | | | | | |
| 44. Texas.....TX | | | | | | | | | | | | | | | |
| 45. Utah.....UT | | | | | | | | | | | | | | | |
| 46. Vermont.....VT | | | | | | | | | | | | | | | |
| 47. Virginia.....VA | | | | | | | | | | | | | | | |
| 48. Washington.....WA | | | | | | | | | | | | | | | |
| 49. West Virginia.....WV | | | | | | | | | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | | | | | | | | | |
| 51. Wyoming.....WY | | | | | | | | | | | | | | | |
| 52. American Samoa.....AS | | | | | | | | | | | | | | | |
| 53. Guam.....GU | | | | | | | | | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | | | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | | | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | | | | | | | | | |
| 57. Totals | | | | | | | | | | | | | | | |

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 6
Commercial Private Flood Policies – First Dollar and Excess
Policy and Claims Data

| States, Etc. | 1 <u>Active Status</u> | 2 Direct Written Premium | 3 Direct Premium Earned | Direct Losses | | | Defense and Cost Containment Expense | | | 910 Number of Policies In Force End of the Prior Year | 1011 Number of Policies In Force End of the Current Year | 1112 Number of Claims Open Beginning of the Current Year | 1213 Number of Claims Opened During the Reporting Year | 1314 Number of Claims Open the End of Current Year | 1415 Number of Claims Closed with Payment |
|-------------------------------------|---------------------------|-----------------------------|----------------------------|-------------------------------|--------------------------------------|---------------------|--------------------------------------|--------------------------------------|---------------------|--|---|---|---|---|--|
| | | | | 4 Paid (Deducting Salvage) | 45 Paid + Change in Case Reserves | 56 Case Reserves | 67 Paid | 78 Paid + Change in Case Reserves | 89 Case Reserves | | | | | | |
| 1. Alabama.....AL | | | | | | | | | | | | | | | |
| 2. Alaska.....AK | | | | | | | | | | | | | | | |
| 3. Arizona.....AZ | | | | | | | | | | | | | | | |
| 4. Arkansas.....AR | | | | | | | | | | | | | | | |
| 5. California.....CA | | | | | | | | | | | | | | | |
| 6. Colorado.....CO | | | | | | | | | | | | | | | |
| 7. Connecticut.....CT | | | | | | | | | | | | | | | |
| 8. Delaware.....DE | | | | | | | | | | | | | | | |
| 9. Dist. Columbia.....DC | | | | | | | | | | | | | | | |
| 10. Florida.....FL | | | | | | | | | | | | | | | |
| 11. Georgia.....GA | | | | | | | | | | | | | | | |
| 12. Hawaii.....HI | | | | | | | | | | | | | | | |
| 13. Idaho.....ID | | | | | | | | | | | | | | | |
| 14. Illinois.....IL | | | | | | | | | | | | | | | |
| 15. Indiana.....IN | | | | | | | | | | | | | | | |
| 16. Iowa.....IA | | | | | | | | | | | | | | | |
| 17. Kansas.....KS | | | | | | | | | | | | | | | |
| 18. Kentucky.....KY | | | | | | | | | | | | | | | |
| 19. Louisiana.....LA | | | | | | | | | | | | | | | |
| 20. Maine.....ME | | | | | | | | | | | | | | | |
| 21. Maryland.....MD | | | | | | | | | | | | | | | |
| 22. Massachusetts.....MA | | | | | | | | | | | | | | | |
| 23. Michigan.....MI | | | | | | | | | | | | | | | |
| 24. Minnesota.....MN | | | | | | | | | | | | | | | |
| 25. Mississippi.....MS | | | | | | | | | | | | | | | |
| 26. Missouri.....MO | | | | | | | | | | | | | | | |
| 27. Montana.....MT | | | | | | | | | | | | | | | |
| 28. Nebraska.....NE | | | | | | | | | | | | | | | |
| 29. Nevada.....NV | | | | | | | | | | | | | | | |
| 30. New Hampshire.....NH | | | | | | | | | | | | | | | |
| 31. New Jersey.....NJ | | | | | | | | | | | | | | | |
| 32. New Mexico.....NM | | | | | | | | | | | | | | | |
| 33. New York.....NY | | | | | | | | | | | | | | | |
| 34. No. Carolina.....NC | | | | | | | | | | | | | | | |
| 35. No. Dakota.....ND | | | | | | | | | | | | | | | |
| 36. Ohio.....OH | | | | | | | | | | | | | | | |
| 37. Oklahoma.....OK | | | | | | | | | | | | | | | |
| 38. Oregon.....OR | | | | | | | | | | | | | | | |
| 39. Pennsylvania.....PA | | | | | | | | | | | | | | | |
| 40. Rhode Island.....RI | | | | | | | | | | | | | | | |
| 41. So. Carolina.....SC | | | | | | | | | | | | | | | |
| 42. So. Dakota.....SD | | | | | | | | | | | | | | | |
| 43. Tennessee.....TN | | | | | | | | | | | | | | | |
| 44. Texas.....TX | | | | | | | | | | | | | | | |
| 45. Utah.....UT | | | | | | | | | | | | | | | |
| 46. Vermont.....VT | | | | | | | | | | | | | | | |
| 47. Virginia.....VA | | | | | | | | | | | | | | | |
| 48. Washington.....WA | | | | | | | | | | | | | | | |
| 49. West Virginia.....WV | | | | | | | | | | | | | | | |
| 50. Wisconsin.....WI | | | | | | | | | | | | | | | |
| 51. Wyoming.....WY | | | | | | | | | | | | | | | |
| 52. American Samoa.....AS | | | | | | | | | | | | | | | |
| 53. Guam.....GU | | | | | | | | | | | | | | | |
| 54. Puerto Rico.....PR | | | | | | | | | | | | | | | |
| 55. U.S. Virgin Islands.....VI | | | | | | | | | | | | | | | |
| 56. Northern Mariana Islands.....MP | | | | | | | | | | | | | | | |
| 57. Totals | | | | | | | | | | | | | | | |

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|---|
| <p style="text-align: right;">DATE: <u>5/13/2026</u></p> <p>CONTACT PERSON: <u>Kris DeFrain</u></p> <p>TELEPHONE: <u>816-783-8229</u></p> <p>EMAIL ADDRESS: <u>kdefrain@naic.org</u></p> <p>ON BEHALF OF: <u>Casualty Actuarial and Statistical (C) Task Force</u></p> <p>NAME: <u>Christian Citarella</u></p> <p>TITLE: <u>Chair of CASTF</u></p> <p>AFFILIATION: <u>New Hampshire Insurance Department</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-14BWG</u></p> <p>Year <u>2027</u></p> <p>Changes to Existing Reporting <input checked="" type="checkbox"/> [X]</p> <p>New Reporting Requirement <input type="checkbox"/> []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact <input checked="" type="checkbox"/> [X]</p> <p>Modifies Required Disclosure <input type="checkbox"/> []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [NO]</p> <p><i>***If Yes, complete question below***</i></p> <p style="text-align: center;">DISPOSITION</p> <p><input type="checkbox"/> [] Rejected For Public Comment</p> <p><input type="checkbox"/> [] Referred To Another NAIC Group</p> <p><input type="checkbox"/> [] Received For Public Comment</p> <p><input type="checkbox"/> [] Adopted Date _____</p> <p><input type="checkbox"/> [] Rejected Date _____</p> <p><input type="checkbox"/> [] Deferred Date _____</p> <p><input type="checkbox"/> [] Other (Specify) _____</p> |
|--|---|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input checked="" type="checkbox"/> [X] INSTRUCTIONS | <input type="checkbox"/> [] CROSSCHECKS |
| <input type="checkbox"/> [] QUARTERLY STATEMENT | <input type="checkbox"/> [] BLANK | |
| <input type="checkbox"/> [] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input type="checkbox"/> [] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input type="checkbox"/> [] Health | <input type="checkbox"/> [] Health (Life Supplement) | <input type="checkbox"/> [] Life (Health Supplement) |

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Schedule P instructions with revisions exposed at the Casualty Actuarial and Statistical (C) Task Force

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

See next page

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

In 2025-07BWG, CASTF proposed editorial revisions to the Schedule P instructions, which were adopted for the 2025 annual statement. The objective was to clarify the instructions, especially the instructions for incurred years prior to the most recent ten. The current proposal continues that project. The proposed changes fall into five categories:

1. Correcting incorrect information

Example: Corrected “Earned premium is on a calendar year basis.” in the overview section to “Earned premium is on a calendar year basis in Part 1, an exposure year basis in Part 6, and a policy year basis in Part 7.”

2. Moving content without changing the content

Example: Moved the description of the prior row for salvage and subrogation received from the overview section to the Part 1 section because this instruction applies specifically to Part 1.

3. Making minor improvements

Example: Brought the DCC and A&O descriptions into alignment with the current version of SSAP No. 55.

4. Increasing clarity without changing the meaning

Example: Added descriptions for prior year rows and some example exhibits.

5. Correcting information that used to be true based on old annual statement blanks but is no longer true

Example: Deleted “Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported.” from this language in the Part 1 section: “Premiums earned and losses paid, unpaid, and incurred should reconcile with the Statement of Income page. Part 1 – Summary is the total of the Schedule P lines. Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported.” It looks like the three nonproportional assumed reinsurance lines used to not be shown separately and explicitly in other areas of the annual statement besides Schedule P. (E.g., in the 1994 annual statement blank, the state pages did not have lines for reinsurance, and the Underwriting and Investment Exhibits had four lines for reinsurance [numbered 30A through 30D] that were not further specified beyond “Reinsurance”.) But that is no longer true (on, for example, the state pages and the UW&I pages). So it no longer seems necessary to mention summing here.

CASTF exposed the proposed changes for a 45-day comment period ending on 3/26/2026. Five comment letters were received, and changes were made in response to the comments.

SCHEDULE P

1. ~~1.~~—There are seven parts and the interrogatories within Schedule P. Part 1 provides detailed information on losses and loss adjustment expenses. Part 2 provides a history of incurred losses and defense & cost containment (DCC) expenses. Part 3 provides a history of loss and DCC payments. Part 4 provides a history of bulk and incurred but not reported (IBNR) reserves. Part 5 provides a history of claim counts. Part 6 provides a history of premiums earned. Part 7 provides a history of loss sensitive contracts. Schedule P Interrogatories provides for additional calculation and explanation of various amounts.
2. ~~2.~~—Earned premium is on a calendar year basis in Part 1, an exposure year basis in Part 6, and a policy year basis in Part 7. Except in Part 7, which shows policy year experience, losses incurred should be assigned to the year in which the event occurred that triggered coverage under the contract. This may be a date of accident (occurrence policies), a date of report (claims-made policies), a policy issue date (tail policies), or a date of discovery (fidelity and surety). Hereafter, this is called the “incurred year.”
3. ~~3.~~—Schedule P displays ten years of historical data for all lines of business.
4. ~~4.~~—Report all dollar amounts in Schedule P in thousands of dollars (\$000 omitted), by either rounding or truncating. Claim counts should be reported as whole numbers.
5. ~~5.~~—The Except for medical professional liability, other liability and products liability which separately display data for occurrence and claims-made coverages and the reinsurance lines, the lines of business in Schedule P are groupings of the lines of business used on the Exhibit of Premiums and Losses (“state page”). In some cases, the heading of the line of business has been expanded for clarity. Business reported on the Aggregate write-ins for other lines of business line of the ~~Statement of Income and the State p~~Page should be included in the Other Liability sections of Schedule P.
6. ~~6.~~—Data for Annual Statement Line 17.3 – Excess Workers’ Compensation should be reported as Other Liability – Occurrence as appropriate for the contractual terms of the policy.
7. ~~7.~~—Schedule P includes only the data for the reporting entity identified on the Jurat page of the Annual Statement. Do not include consolidated data for affiliated companies except in a Combined Annual Statement. If the reporting entity participates in an intercompany pooling agreement, show only its share of the business, not the total for all participants.
8. ~~8.~~—Retroactive reinsurance should not be reflected in Schedule P. The transferor in such an agreement must record, without recognition of the retroactive reinsurance, its loss and loss adjustment expense reserves on a gross basis on its balance sheet and in all schedules and exhibits. The transferee in such an agreement must exclude the retroactive reinsurance from its loss and loss adjustment expense reserves and from its schedules and exhibits.
9. ~~9.~~—Schedule P, Part 1 should be gross of non-tabular discount and net of tabular discount, with the exception of Columns 35 and 36, which are net of all discount. The other parts of Schedule P should be gross of all discounts so that the annual statement user can make effective use of the triangles in Parts 2, 3, and 4. A discount implicit in tabular reserves may be included in Schedule P, Part 1. Schedule P, Part 2 is to be reported gross of ALL discounts. Otherwise, Schedule P is to be presented on a non-discounted basis. Information in Schedule P is to be reported on an undiscounted basis in order to make effective use of the triangles in Parts 2, 3 and 4. The reserves reported are expected to represent the ultimate amounts to be paid, including anticipated inflation. If discounting of loss or loss expense reserves is reflected on any line of Page 3 of this Annual Statement, reconciliation is provided in Schedule P, Part 1. ~~W~~Also, workpapers relating to any discount amounts must be available for examination upon request. The tabular reserve discount does not need to be shown separately. Discounting is governed by SSAP No. 65—Property and Casualty Contracts.
- ~~10.~~
- ~~9.~~
- ~~11.~~
- ~~10.~~ The reserves for unpaid losses and loss adjustment expenses should take into account the explicit or implicit impacts of the various factors affecting claim frequency or ultimate claim cost.
- ~~10.~~ In those instances where a reporting entity files an amended annual statement as a result of a restatement of previous year earned premium, losses or loss adjustment expenses, Schedule P must be restated and included in the amended annual statement.

The Prior Row:

~~12.~~ 11. — The “prior” row contains data for all incurred years prior to the most recent 10 years. The calculation of the prior row differs by Part and Section.

~~13.~~
~~14.~~ 11. ~~12.~~ — For salvage and subrogation received on the “prior” row, report losses and expenses paid in the current year.

~~In those instances where a reporting entity files an amended annual statement as a result of a restatement of previous year earned premium, losses or loss adjustment expenses, Schedule P must be restated and included in the amended annual statement.~~

Intercompany Pooling:

~~15.~~ 12. ~~13.~~ — Many insurers have an intercompany pooling arrangement with affiliated companies, approved by the domiciliary commissioner, in which the business written is reallocated among the affiliated companies according to a specified percentage. Some affiliated companies may be part of the intercompany pool and some may not, and some lines may be included, and some may not. The premiums and losses are to be reported in Schedule P after such intercompany pooling arrangements, not before. SSAP No. 63 establishes statutory accounting principles for intercompany pools.

~~16.~~ 13. ~~14.~~ — Pooled business ceded is that which, if retained instead of ceded, would be pooled among the affiliated companies ~~who that~~ are party to the intercompany pooling agreement. Any such business that is ceded by the intercompany pool participants to non-pooled companies before the pooling distribution among the participating companies is considered pooled business ceded. Non-pooled business includes all direct, assumed, and ceded business not subject to intercompany pooling, as well as any pooled business that is ceded after the intercompany pooling distribution has been made.

~~17.~~ 14. ~~15.~~ — Direct and Assumed columns include the participation in any intercompany pool. In addition, all direct business not pooled plus assumed business from other than the intercompany pool is to be included. Ceded columns include the company’s participation in the intercompany pool such as any ceding by the company to companies independent of the intercompany pool.

15. ~~16.~~ — Claim counts should be reported in accordance with the intercompany pooling arrangement and should reflect the company’s proportionate share of the total number of claims. If the company’s losses are 40% of the intercompany pool, then 40% of the claim count should be reported.

~~18.~~ 16. — Intercompany pooling may cause the numbers reported in Schedule P to not reconcile to other parts of the annual statement. For example, a 0% pool participant will show nothing in Schedule P but could have significant direct business in the Underwriting and Investment Exhibit.

~~19.~~ 17. ~~17.~~ — The pooling percentage is to reflect the company’s participation in the intercompany pool as of year-end. When changes to intercompany pooling agreements impact previous ~~accident-incurred~~ years, historical data values in Schedule P Parts, 1 through 6 should be restated based on the new pooling percentage. This should be done to present meaningful development patterns in Schedule P. When intercompany pooling changes only impact future ~~accident-incurred~~ years, no restatement of historical values should be made. Any significant changes in the intercompany pooling arrangements should be reported in the Schedule P Interrogatories. An illustration for reporting pooled business, Exhibit A, follows.

EXHIBIT A

POOLED BUSINESS – SCHEDULE P REPORTING EXAMPLE

This example has been prepared as a clarification of the NAIC *Annual Statement Instructions* to demonstrate how business subject to pooling among affiliated companies should be incorporated in the “Direct + Assumed” and the “Ceded” columns of Schedule P for each affiliated company.

- Company A – The ~~Flagship~~ lead company; ~~d~~ does the pooling and cedes some business before pooling.
- Company B – Cedes some pool business before ceding to Company A for pooling.
- Company C – Cedes business after pooling.
- Company D – Cedes nothing except to the pool.

Sample Situation

| | <u>Company A</u> | <u>Company B</u> | <u>Company C</u> | <u>Company D</u> | <u>Total</u> |
|-------------------------------------|---------------------|--------------------|--------------------|------------------|-----------------|
| <u>Pool Business:</u> | | | | | |
| 1. Direct & Assumed (a) | 90,000 | 15,000 | 10,000 | 5,000 | 120,000 |
| 2. Pool Assembly Assumed (Ceded) | 25,000 | (10,000) | (10,000) | (5,000) | - |
| 3. (Ceded) Before Pooling Dist. (a) | <u>(15,000)</u> (c) | <u>(5,000)</u> (b) | - | - | <u>(20,000)</u> |
| 4. Net Before Pooling Dist. | 100,000 | - | - | - | 100,000 |
| 5. Pooling Dist. Assumed (Ceded) | <u>(25,000)</u> | <u>15,000</u> | <u>7,000</u> | <u>3,000</u> | - |
| 6. Net Retained – Amount | 75,000 | 15,000 | 7,000 | 3,000 | 100,000 |
| – Percent Specified | 75% | 15% | 7% | 3% | 100% |
| <u>Non-Pool Business:</u> | | | | | |
| 7. Direct & Assumed (e) | 5,000 | 4,000 | - | - | 9,000 |
| 8. (Ceded) | <u>(2,000)</u> (e) | <u>(1,000)</u> (e) | <u>(5,000)</u> (d) | - | <u>(8,000)</u> |
| 9. Net | 3,000 | 3,000 | (5,000) | - | 1,000 |
| <u>Total Business:</u> | | | | | |
| 10. Direct & Assumed Before Pooling | 95,000 | 19,000 | 10,000 | 5,000 | 129,000 |
| 11. Pool Assembly Assumed (Ceded) | 25,000 | (10,000) | (10,000) | (5,000) | - |
| 12. (Ceded) Other Than Pooling | (17,000) | (6,000) | (5,000) | - | (28,000) |
| 13. Pooling Dist. Assumed (Ceded) | <u>(25,000)</u> | <u>15,000</u> | <u>7,000</u> | <u>3,000</u> | - |
| 14. Net | <u>78,000</u> | <u>18,000</u> | <u>2,000</u> | <u>3,000</u> | <u>101,000</u> |

- | | |
|-----------|--|
| (a) _____ | Business which, if retained, would be pooled |
| (b) _____ | Ceded before pool assembly <u>in</u> (Line 2) |
| (c) _____ | Ceded before pooling distribution <u>in</u> (Line 5), before and/or after pool assembly <u>in</u> (Line 2) |
| (d) _____ | Ceded after pooling distribution <u>in</u> (Line 5) |
| (e) _____ | Business which, if retained, would not be pooled |

Schedule P Reporting

Reporting Principle for Intercompany Pool Business – Each company reports its share/percent of the total pooled “Direct + Assumed” and the total pooled “Ceded” business respectively.

| | | | | | | |
|-------------------------|------------------------------|-----------------|----------------|----------------|--------------|-----------------|
| <u>Direct + Assumed</u> | | | | | | |
| 15. | Pool % of Line 1, Total Col. | 90,000 | 18,000 | 8,400 | 3,600 | 120,000 |
| 16. | Non-Pooled (Line 7) | <u>5,000</u> | <u>4,000</u> | <u>-</u> | <u>-</u> | <u>9,000</u> |
| 17. | Total | 95,000 | 22,000 | 8,400 | 3,600 | 129,000 |
| <u>(Ceded)</u> | | | | | | |
| 18. | Pool % of Line 3, Total Col. | (15,000) | (3,000) | (1,400) | (600) | (20,000) |
| 19. | Non-Pooled (Line 8) | <u>(2,000)</u> | <u>(1,000)</u> | <u>(5,000)</u> | <u>-</u> | <u>(8,000)</u> |
| 20. | Total | <u>(17,000)</u> | <u>(4,000)</u> | <u>(6,400)</u> | <u>(600)</u> | <u>(28,000)</u> |
| 21. | Total Net | 78,000 | 18,000 | 2,000 | 3,000 | 101,000 |

SCHEDULE P – PART 1

1. ~~1.~~—Premiums earned, ~~and losses paid, unpaid, and incurred, and loss adjustment expenses incurred~~ should reconcile with the Statement of Income page. Part 1 – Summary is the total of the Schedule P lines. ~~Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported.~~
2. ~~2.~~—The columnar headings provide instructions necessary for completion.
- a. ~~a.~~—“Assumed” means reinsurance assumed, including from ~~affiliated~~ intercompany pooling agreements, but excluding any non-proportional reinsurance assumed reported as a separate line and reported accordingly.
- b. ~~b.~~—“Direct” means as directly written, but not if part of an ~~affiliated~~ intercompany pooling agreement.
- c. ~~c.~~—“Ceded” means reinsurance ceded on business so reported as direct or assumed.
3. ~~3.~~ The number of claims reported is to be cumulative by incurred year. The number of claims reported in each incurred year is equal to the number of open claims at the end of the current year plus cumulative claims closed with or without payment in current and previous calendar years, possibly with adjustments for reopened claims.
- ~~3.4.~~ If the company changes its method of counting claims, the new method should be disclosed in Schedule P Interrogatories, Interrogatory 7.
5. ~~3.~~—Number of Claims Reported, Column 12, applies to Auto Liability (commercial and private passenger), Workers’ Compensation, Medical Professional Liability, Homeowners/Farmowners Multiple Peril, Commercial Multiple Peril, Other Liability, Products Liability, Auto Physical Damage and Warranty only. This column may be left blank in all other lines, including the Summary. Reported claim counts are not shown for lines combining different types of coverage, such as Special Liability, Special Property, International, and Nonproportional Assumed Reinsurance. For each year, this Column should include the cumulative number of claims reported through the annual statement date for business subject to intercompany pooling and business not subject to intercompany non-pooled business pooling.
6. ~~4.~~ Number of Claims Outstanding, Column 25, must be reported for all lines, except ~~Non-proportional Assumed Reinsurance – Property, Liability and Financial Lines.~~
7. ~~5.~~ For nonproportional reinsurance, there is no simple way to determine the number of claims ceded or assumed, since the percentage of a claim that is ceded depends on the size of the claim. For this reason, ceded and net claim counts are not shown for any line of business, and assumed claim counts are not shown for nonproportional reinsurance.
- ~~4.8.~~ For reporting entities reporting on a pooling basis, the pooling percentage should be applied to claim count as well as dollar amounts for the business subject to intercompany pooling. Indicate in the Interrogatories whether claim count information is reported per claim or per claimant.
- ~~5.9.~~ ~~4.~~—Cumulative salvage and subrogation received and losses and loss adjustment expenses paid should be reported for each specified incurred year.
5. ~~6.~~—In Schedule P, Part 1, salvage and subrogation received should be reported net of reinsurance, if any. Loss and loss adjustment expense payments are to be reported net of salvage and subrogation received in Schedule P.
- ~~10.~~
6. ~~7.~~—
- The workpapers that show a reconciliation explaining reinsurance, discounting, and salvage and subrogation adjustments should be available for examination on request.
- ~~7.11.~~
7. ~~8.~~—Report cumulative amounts paid or received for specific years.

~~8.12.~~ 8.—The loss adjustment expenses from the Underwriting and Investment Exhibit, Part 3, are separated into one of two categories: DCC or A&O. ~~DCC expenses are those that are correlated with the loss amounts, and the A&O are as those expenses that are correlated with claim counts or are general loss adjustment expenses. In projecting the necessary reserves for these expenses, actuaries use a different approach for each of the two types of expenses. It is the character of the expenses that is most important, not whether the expenses were internal or external to the reporting entity.~~

~~9.13.~~ 9.—DCC expenses include defense, litigation and medical cost containment expenses, whether internal or external. DCC include, but are not limited to, the following items: “Defense” means defense by the reporting entity in a contentious situation, whether a first party or a third-party claim. The fees charged for reporting entity employees should include overhead, just as an outside firm’s charges would include. ~~The expenses exclude expenses incurred in the determination of coverage. These expenses include the following items:~~

- ~~a.~~ a.—Surveillance expenses;
- ~~b.~~ b.—Fixed amounts for medical cost containment expenses;
- ~~c.~~ c.—Litigation management expenses;
- ~~d.~~ d.—Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by accident year;
- ~~e.~~ e.—Fees or salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in defense of a claim, and fees or salaries for rehabilitation nurses, if such cost is not included in losses;
- ~~f.~~ f.—Attorney fees incurred owing to a duty to defend, even when other coverage does not exist; and
- ~~g.~~ g.—The cost of engaging experts.

~~10.14.~~ 10.—A&O expenses are loss adjustment expenses other than DCC ~~are the remaining loss adjustment expenses.~~ These expenses include, but are not limited to, the following items:

- ~~a.~~ a.—Fees and expenses of adjusters and settling agents ~~(but not if engaged in a contentious defense);~~
- ~~b.~~ a.
- ~~c.~~ e.—Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by calendar year;
- ~~d.~~ b.
- ~~e.~~ c.—Attorney fees incurred in the determination of coverage, including litigation between the reporting entity and the policyholder; ~~and~~
- ~~f.~~ d.
- ~~g.~~ d.—Fees or salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in the capacity of an adjuster; ~~and.~~
- ~~h.~~ e. Adjustment expenses arising from claims related lawsuits such as extra contractual obligations and bad faith lawsuits.

~~11.15.~~ 11.—The foregoing list is not intended to be all-inclusive. ~~R~~ We are relying on the reporting entities are to use reasonable judgment in particular situations.

~~12.16.~~ 12.—Reporting entities should assign the DCC expenses to the incurred year in which the associated losses were assigned. Reporting entities may assign the A&O expenses in any justifiable way among the incurred years. The preferred way is to apportion these expenses in proportion to the number of claims reported, closed, or outstanding each year.

~~13.17.~~ 13.—**Please Note:** This instruction is intended solely to give guidance on reporting loss adjustment expenses in Schedule P in the annual statement. It is not intended to provide guidance on the types of expenses to include in loss adjustment expenses. These definitions of DCC expense and A&O expense are not intended to affect insurance or reinsurance agreements or other contractual agreements.

~~14.18.~~ 14.—Column 24 is equal to Column 13 – Column 14 + Column 15 – Column 16 + Column 17 – Column 18 + Column 19 – Column 20 + Column 21 – Column 22.

~~15.19.~~ 15.—Column 28, “Net,” equals Column 26 – Column 27, which equals Column 11 + Column 24.

~~16.20.~~ ~~16.~~—Columns 32 and 33 require reporting of the discount, if any, as included on any line in Page 3 on liabilities for unpaid losses and loss adjustment expenses, in regard to non-tabular losses and loss adjustment expenses. (See definition of tabular reserves under Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses in the instructions for the Notes to the Financial Statements.) Columns 35 and 36 are the Column 24 unpaid losses and loss adjustment expenses net of the discount in Columns 32 and 33. Columns 35 and 36 must be completed and should agree with net balance sheet reserves after discount. If the reporting entity participates in an intercompany pool and reports on a pooling basis, then the percentage of that pool reported herein should be entered in Column 34. If some of the business is pooled and some is not, leave Column 34 blank and explain in Interrogatory 7.2 of the Schedule P Interrogatories.

~~17.21.~~ ~~17.~~—Report in Column 23 the estimated amount of anticipated salvage and subrogation that has been taken as credit (netted) in the reserves for unpaid losses and loss adjustment expenses reported in Column 24. (Note: Column 23 is a memo column only as the amounts contained therein have already been taken into consideration in Columns 13 through 20.)

~~a.~~ — ~~Non proportional assumed reinsurance – Property Reinsurance~~

~~Includes all the following lines: Fire, Allied Lines, Ocean Marine, Inland Marine, Pet Insurance Plans, Earthquake, Group Accident and Health, Credit Accident and Health, Other Accident and Health, Auto Physical Damage, Boiler and Machinery, Burglary and Theft and International (of the foregoing).~~

~~b.~~ — ~~Non proportional assumed reinsurance – Liability~~

~~Includes all the following lines: Farmowners Multiperil, Homeowners Multiperil, Commercial Multiperil, Medical Professional Liability, Workers' Compensation, Other Liability, Products Liability, Auto Liability, Aircraft (all peril) and International (of the foregoing).~~

~~c.~~ — ~~Non proportional assumed reinsurance – Financial~~

~~Includes all the following lines: Financial Guaranty, Fidelity, Surety, Credit, and International (of the foregoing).~~

~~18.22.~~ The definitions of the named lines are the same as used on the State Pages.

~~19.23.~~ ~~19.~~—All proportional reinsurance must be allocated to appropriate lines.

~~20.24.~~ ~~20.~~—As used in this instruction “non-proportional reinsurance” means reinsurance in excess of retention by the ceding company, and “proportional reinsurance” means fixed percentage of all losses.

~~21.25.~~ ~~21.~~—For contracts that afford both proportional and non-proportional reinsurance, allocate premiums and losses to their component parts.

The Prior Row:

~~22.~~—Row 1 “Prior” row, Columns 4 through 11, should only reflect amounts paid or received in the current calendar year.

~~26.~~ In the prior row for losses and loss adjustment expenses paid and salvage and subrogation received (columns 4 through 10), report only losses and loss adjustment expenses paid and salvage and subrogation received in the current calendar year for all incurred years prior to the most recent ten years.

~~27.~~ Column 4 - 5 + 6 - 7 in the prior row equals column 10 - 9 in the Part 3 prior row.

~~28.~~ The unpaid losses and loss adjustment expenses on the prior row are the unpaid losses and loss adjustment expenses as of the annual statement date for all incurred years prior to the most recent ten years.

~~29.~~ The prior row should show the number of claims outstanding in the Summary and for all lines except Nonproportional Assumed Reinsurance – Property, Liability and Financial Lines. This row equals the number of claims outstanding as of the annual statement date for all incurred years prior to the most recent ten years.

22-30. There is no reporting required on the prior row for earned premiums, incurred loss and loss adjustment expenses, loss and loss adjustment expense percentages, number of claims reported, or the intercompany pooling participation percentages.

SCHEDULE P – PARTS 1H and 1RA THROUGH 1U

- ~~1. Reporting entities should complete Schedule P in thousands only but must report all claim counts in whole numbers.~~
- ~~2. The number of claims reported is to be cumulative by incurred year. The number of claims reported in each incurred year is equal to the number of open claims at the end of the current year plus cumulative claims closed with or without payment for current and previous calendar years.~~
- ~~3. If the Company changes its method of counting claims, the new method should be disclosed in Schedule P Interrogatories, Interrogatory 6.~~
- ~~1. Products Liability must be reported separately from Other Liability throughout the statement. This requires that companies separate and restate amounts previously reported as "Other Liability" into the appropriate parts of Schedule P and fully disclose amounts pertaining to "Products Liability."~~
- ~~2.1. "Claims-made Earned Premiums" shall include earned premiums arising from any policy where the predominant exposure is claims-made, but "Claims-made Earned Premiums" shall not include "Tail Earned Premiums."~~
- ~~3.2. "Occurrence Earned Premiums" are all premiums, which are not claims-made.~~
- ~~4.3. "Tail Earned Premiums" applicable to a claims-made insurance program are to be included in the occurrence Part for the respective line.~~
- ~~5.4. The following rules apply to accounting for claims-made losses:~~
- ~~a. The "incurred" date shall be the report date for losses attributable to claims-made (but not "tail" forms).~~
 - ~~b. Losses shall be booked to the report year that is consistent with the report year definition contained in the policy.~~
- ~~6.5. The rule for accounting for losses incurred on tail policies is that such losses must be assigned to the year in which the policy was issued and are to be included in the Occurrence Part for the respective line.~~
- ~~10. Report in Column 23 the estimated amount of anticipated salvage and subrogation that has been taken as credit (netted) in the reserves for unpaid losses and loss adjustment expenses reported in Column 24. (Note: Column 23 is a memo column only as the amounts contained therein have already been taken into consideration in Columns 13 through 20.)~~
- ~~11. In Column 28, "Net," the amount should equal Column 26 – Column 27, which equals Column 11 + Column 24.~~
- The Prior Row:**
- ~~12. For the "prior" row, report amounts paid or received in current year only. Report cumulative amounts paid or received for specific years. Report loss payments net of salvage and subrogation received.~~

SCHEDULE P – PARTS 2, 3, AND 4

1. Schedule P, Part 2 provides a summary of the loss and DCC expense values over time and may be used to review the loss and expense development overview to test the adequacy of the reporting entity's reserves. Schedule P, Part 3 shows the payment patterns for cash flow projections, discounting calculations, and actuarial projections. Schedule P, Part 4 is an exhibit showing the historical bulk and IBNR reserves as reported. ~~Part 4 does not show a development of these reserves, and it will not, by itself, provide a test of the adequacy of these reserves.~~
2. Schedule P, Parts 2, 3 and 4 have parallel formats and are the basic exhibits for actuarial and financial analyses. The same Line Titles that applied to Schedule P, Part 1 also apply to Parts 2, 3 and 4.
 - a. ~~a.~~ All dollar amounts in Schedule P, Parts 2, 3, and 4 are reported net of reinsurance. Claim count information in Part 3 should be on a direct and assumed basis.
 - a.b. Parts 2 and 3 show cumulative amounts by incurred year.
 - b.c. All amounts are to be reported net of salvage and subrogation paid and anticipated.
 - e.d. All amounts in Parts 2 and 4 must be reported gross of both tabular and non-tabular discounting.
 - d.e. ~~d.~~ In Part 2, the "Development" in Column 11 and 12 should be the current year less the first previous year (for 1-year development) or second previous year (for 2-year development), showing the (redundant) or adverse development.
 - e. ~~Report all amounts in thousands of dollars (\$000 omitted), by either rounding or truncating.~~

Part 3 Claim Counts:

3. The claim counts in Columns 11 and 12 of Part 3 should be reported for Auto Liability (commercial and private passenger), Workers' Compensation, Medical Professional Liability, Homeowners/Farmowners Multiple Peril, Commercial Multiple Peril, Other Liability, Products Liability, Auto Physical Damage and Warranty only.

Loss Adjustment Expenses:

43. The triangles include only the DCC loss adjustment expenses. The reason for this is that DCC adjustment expenses correlate with loss amounts, but the A&O expenses do not.

Bulk and IBNR Reserves:

54. The Bulk and IBNR reserves for losses and DCC expenses in Part 4 are intended to include reserves for incurred but not reported claims, for reopened claims, for development on case reserves of reported claims, and for aggregate reserves on newly reported claims without specific case reserves. The Bulk and IBNR reserves in Part 4 are the actuarially determined reserves and are included in the losses unpaid and loss-DCC expenses unpaid reported in Schedule P, Parts 1 and 2. The bulk and IBNR reserves do not include case reserves established on individual claims.
65. The bulk and IBNR reserves in Part 4 include provision for DCC expenses, unlike the reserves reported in the Underwriting and Investment Exhibit, Part 2A.

The Prior Row:

7. ~~6.~~ In Part 2, Line 1, Column 1, should show include the loss and DCC expense reserves (case + bulk + IBNR) as of December 31 of the year in the column heading for all incurred years prior to the year in the column heading. For example, if the year in Column 1 is 20XX, Line 1 of Column 1 should show the loss and DCC expense reserves as of December 31, 20XX for incurred years 20XX-1 and prior. previously reported at year-end of the last year for all accident years before the last year.

The subsequent development each year across Line 1 will relate to these reserves. For example, Column 2 of Line 1 shows the loss and DCC expense payments in calendar year 20XX+1 on incurred years 20XX-1 and prior plus the reserves (case + bulk + IBNR) as of year-end 20XX+1 on incurred years 20XX-1 and prior. Column 3 shows the payments in calendar years 20XX+1 and 20XX+2 on incurred years 20XX-1 and prior plus the reserves (case + bulk + IBNR) as of year-end 20XX+2 on incurred years 20XX-1 and prior. and will show the subsequent payments and outstanding reserves.

This example shows how to calculate the Part 2, Line 1, Column 1 value for the 2024 annual statement. This calculation uses information from Parts 2 through 4 of the 2023 annual statement.

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 2

Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 Omitted)

| <u>Years in Which Losses</u> <u>Were Incurred</u> | <u>1</u> <u>2014</u> | <u>2</u> <u>2015</u> | <u>3</u> <u>2016</u> | <u>4</u> <u>2017</u> | <u>5</u> <u>2018</u> | <u>6</u> <u>2019</u> | <u>7</u> <u>2020</u> | <u>8</u> <u>2021</u> | <u>9</u> <u>2022</u> | <u>10</u> <u>2023</u> |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------|
| <u>1. Prior</u> | | <u>830,000</u> | | | | | | | | |
| <u>2. 2014</u> | | <u>430,000</u> | | | | | | | | |

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 3

Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 Omitted)

| <u>Years in Which Losses</u> <u>Were Incurred</u> | <u>1</u> <u>2014</u> | <u>2</u> <u>2015</u> | <u>3</u> <u>2016</u> | <u>4</u> <u>2017</u> | <u>5</u> <u>2018</u> | <u>6</u> <u>2019</u> | <u>7</u> <u>2020</u> | <u>8</u> <u>2021</u> | <u>9</u> <u>2022</u> | <u>10</u> <u>2023</u> |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------|
| <u>1. Prior</u> | | <u>180,000</u> | | | | | | | | |
| <u>2. 2014</u> | | <u>150,000</u> | | | | | | | | |

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 4

Bulk and IBNR Reserves on Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 Omitted)

| <u>Years in Which Losses</u> <u>Were Incurred</u> | <u>1</u> <u>2014</u> | <u>2</u> <u>2015</u> | <u>3</u> <u>2016</u> | <u>4</u> <u>2017</u> | <u>5</u> <u>2018</u> | <u>6</u> <u>2019</u> | <u>7</u> <u>2020</u> | <u>8</u> <u>2021</u> | <u>9</u> <u>2022</u> | <u>10</u> <u>2023</u> |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------|
| <u>1. Prior</u> | | <u>420,000</u> | | | | | | | | |
| <u>2. 2014</u> | | <u>210,000</u> | | | | | | | | |

Annual Statement for the Year 2024 of the XYZ Insurance Company
Schedule P – Part 2

Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 Omitted)

| <u>Years in Which Losses</u> <u>Were Incurred</u> | <u>1</u> <u>2015</u> | <u>2</u> <u>2016</u> | <u>3</u> <u>2017</u> | <u>4</u> <u>2018</u> | <u>5</u> <u>2019</u> | <u>6</u> <u>2020</u> | <u>7</u> <u>2021</u> | <u>8</u> <u>2022</u> | <u>9</u> <u>2023</u> | <u>10</u> <u>2024</u> |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------|
| <u>1. Prior</u> | <u>930,000</u> | | | | | | | | | |
| <u>2. 2015</u> | | | | | | | | | | |

Case reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
 $830,000 + 430,000 - (180,000 + 150,000) - (420,000 + 210,000) = 300,000$

Bulk and IBNR reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
 $420,000 + 210,000 = 630,000$

Case and bulk and IBNR reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
 $300,000 + 630,000 = \mathbf{930,000}$

The Part 2, Line 1, Column 1 value in the current year's annual statement (930,000) equals:
Part 2, Line 1, Column 2 in the prior year's annual statement (830,000)
+ Part 2, Line 2, Column 2 in the prior year's annual statement (430,000)

- Part 3, Line 1, Column 2 in the prior year's annual statement (180,000)

- Part 3, Line 2, Column 2 in the prior year's annual statement (150,000).

~~7.—~~

~~8. In Part 3, Line 1, Column 1, the amount entered should always be “zero.*” In Line 1, Column 2, the amount should be the loss and DCC expense payments made in that calendar year on the reserves reported in Part 2, Line 1, Column 1. (These payments should are also have been included in Part 2, Line 1, Column 2.) For example, if the year in Column 1 is 20XX, Column 2 of Line 1 shows the loss and DCC expense payments in calendar year 20XX+1 on incurred years 20XX-1 and prior. Column 3 shows the payments in calendar years 20XX+1 and 20XX+2 on incurred years 20XX-1 and prior. In Line 1, Column 3, the amount should be the loss and expense payments made in that year and the preceding year on the reserves reported in Part 2, Line 1, Column 2. (These payments should are also have been included in Part 2, Line 1, Column 3.) Columns 4 through 10 should continue to cumulate the payments in the same way and tie into the Part 2 “prior” row.~~

**Line 1 only shows payments made subsequent to the establishment of reserves as of the earliest evaluation date in the table. For example, in the 2024 annual statement, the earliest evaluation date is year-end 2015, and Part 3 only shows payments made subsequent to the establishment of reserves as of year-end 2015. This explains why the amount in Line 1, Column 1 of Part 3 has to be zero, since there can be no payments made in 2015 subsequent to the establishment of reserves as of year-end 2015.*

~~8.—~~

~~7-9. Part 4, Line 1 shows the bulk and IBNR reserves at each year-end (using the year in the column heading) for all incurred years prior to the most recent 10. For example, if the year in Column 1 is 20XX, Line 1 of Column 1 should show the loss and DCC expense bulk and IBNR reserves as of December 31, 20XX for incurred years 20XX-1 and prior. In Part 4, Row 1, Column 1, the amount entered should be the bulk and IBNR that was included in Part 2, Row 1, Column 1, (which should equal the case reserves plus the bulk and IBNR). In fact, the entire Row 1 should be the bulk and IBNR included in Part 2, Row 1.~~

~~9. The “prior” row can be reconciled with the immediately preceding year’s Annual Statement by breaking down the accident years in the preceding Annual Statement and properly summing the parts.~~

SCHEDULE P – PART 5

~~1. 1. Part 5 is a reporting of claim count information in one location, all of which should have been reported in the current or previous Annual Statements. Part 5, Section 1 shows the cumulative number of claims closed with loss payment. Column 10 of Part 5, Section 1 ties to Column 11 of Part 3, except for the values in the Prior Row, as previously reported in Part 3, Column 11. Lines 3 through 11 of Column 11 of Part 3 of the prior year’s Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 1 of the current Schedule P. Similarly, Part 3 of older years’ Schedule P maps to Columns 1 through 8 of the current year’s Part 5, Section 1.~~

~~2. Part 5, Section 2 shows the number of claims outstanding as of the year-end in the column header. Column 10 of Part 5, Section 2 ties to Column 25 of Part 1. Lines 3 through 11 of Column 25 of Part 1 of the prior year’s Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 2 of the current Schedule P. Similarly, Column 25 of Part 1 of older years’ Schedule P maps to Columns 1 through 8 of the current year’s Part 5, Section 2, as previously reported in Part 1, Column 25, for all years, since this information has always been required in Schedule P.~~

~~4-3. Part 5, Section 3 shows the cumulative number of claims reported. Column 10 of Part 5, Section 3 ties to Column 12 of Part 1, except for the Prior Row. Lines 3 through 11 of Column 12 of Part 1 of the prior year’s Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 3 of the current Schedule P. Similarly, Part 1 of older years’ Schedule P maps to Columns 1 through 8 of the current year’s Part 5, Section 3, as previously reported in Part 1, Column 12.~~

~~2-4. All claim count information reported in Schedule P should be on a “direct and assumed” basis and should reconcile. “Direct and assumed” means direct business not subject to intercompany pooling, plus the company’s proportionate share proportion of a pool of the total number of pooled claims, plus assumed from other than the intercompany pool~~

~~plus proportional reinsurance assumed. Assumed claim counts on proportional reinsurance arrangements should use the same proportion as losses. The same percentage used for dollar amounts should also be used for the claim counts.~~

The Prior Row:

~~3-5. 3.—In Section 1, the Prior Row should show the number of claims closed with loss payment in the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years. each respective year for prior years.~~

~~4-6. 4.—In Section 2, the Prior Row should show the number of claims outstanding as of the year-end in the column header in each respective year for prior years for all incurred years prior to the most recent 10 years.~~

5-7. In Section 3, the Prior Row should show the number of claims reported in the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years. in each respective year for prior years. Even though Schedule P, Part 1, Column 12, does not require prior row information, reporting entities should have this information available. If not, reasonable estimates should be made.

SCHEDULE P – PART 6

1. 1.—For Schedule P, Part 6, the premiums to be reported are exposure or coverage year cumulative earned premiums, recalculated each subsequent year to reflect audits, retrospective adjustments based on loss experience, accounting lags, etc. Mechanically, the written premium file would be restated and the earned premium calculation repeated each year. Premium adjustments for policy periods that cover more than one calendar year should be proportionately distributed between the calendar years covered by the policy period.

For example (adapted from Feldblum’s “Completing and Using Schedule P,” eighth edition, June 2003), suppose that a retrospectively rated workers’ compensation policy is issued on October 1, 2013, for a one-year term and \$10,000 premium. On December 15, 2014, the payroll audit calls for an additional \$1,000 of premium. On July 1, 2015, the first retrospective adjustment calls for no additional or return premium. On July 1, 2016, the second retrospective adjustment calls for an additional premium of \$5,500. Part 6 for this policy, through December 31, 2016, would be completed as follows:

Annual Statement for the Year 2022 of the XYZ Insurance Company
Schedule P – Part 6
Cumulative Premiums Earned Direct and Assumed at Year End

| <u>Years in Which Premiums Were Earned and Losses Were Incurred</u> | <u>1 2013</u> | <u>2 2014</u> | <u>3 2015</u> | <u>4 2016</u> | <u>...</u> |
|---|-------------------|-------------------|-------------------|-------------------|------------|
| <u>1. Prior</u> | | | | | |
| <u>2. 2013</u> | <u>2,500</u> | <u>2,750</u> | <u>2,750</u> | <u>4,125</u> | |
| <u>3. 2014</u> | | <u>8,250</u> | <u>8,250</u> | <u>12,375</u> | |
| <u>...</u> | | | | | |
| <u>13. Earned Premiums (Sch P-Pt. 1)</u> | <u>2,500</u> | <u>8,500</u> | <u>0</u> | <u>5,500</u> | |

- At December 31, 2013, the exposure year 2013 earned premium is \$2,500 (= \$10,000 x 0.25).
- At September 30, 2014, the exposure year 2013 earned premium is \$2,500, and the exposure year 2014 earned premium is \$7,500 (= \$10,000 x 0.75).
- The payroll audit is distributed over the policy term, so on December 31, 2014, the exposure year 2013 earned premium is \$2,750 (= \$2,500 + 0.25 x \$1,000) and the exposure year 2014 earned premium is \$8,250 (= \$7,500 + 0.75 x \$1,000).

- The retrospective premiums are allocated to exposure years in proportion to the coverage period. At December 31, 2016, the exposure year 2013 earned premium is \$4,125 ($=\$2,750 + 0.25 \times \$5,500$) and the exposure year 2014 earned premium is \$12,375 ($=\$8,250 + 0.75 \times \$5,500$).
2. The objective is to develop earned premiums by ~~calendar~~ exposure year of coverage consistent with the loss and DCC expense by incurred year. ~~Only accident years 1993 and subsequent must be reported.~~ The difference between Sections 1 and 2 should equal the total net earned premiums.
 3. A further objective is to determine a more accurate loss and DCC expense ratio and to be able to project the earned but unbilled premiums, which may be an asset or liability. The reporting entity may use any method to recalculate the premiums, which will achieve this objective.
 4. Column 11 is for informational purposes and shows the distribution of premiums earned during the current year ~~for the prior years~~. Premiums as reported in Schedule P, Part 1, Columns 1 or 2, are also shown at the bottom of the exhibit to demonstrate the relationship and to show how Part 6 reconciles with Part 1.
 5. The layout of Sections 1 and 2 is the same. Section 1 shows direct and assumed premiums, while Section 2 shows ceded. ~~same features are applicable for Section 2 on ceded business.~~
 6. NOTE: Purchased tail coverage policies are issued in the year that the coverage is effective. Free extended tail coverage is issued in the year the coverage is triggered.

The Prior Row:

7. The Prior Row should show the incremental earned premium adjustment in ~~each~~ the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years ~~respective year for prior years~~. For Columns 1 through 9, the value in Row 1 for the column corresponding to year 20XX can be determined from the previous year's Schedule P, Part 6 as the sum of Rows 1 and 2 for the column corresponding to year 20XX minus Row 2 for the column corresponding to year 20XX-1. ~~prior experience years (columns), Row 1 for a particular year of experience (x) can be determined from the prior year's Schedule P, Part 6, as the sum of Rows 1 plus 2 for experience year (x) (column) minus Row 2 for the preceding year (x-1).~~

SCHEDULE P – PART 7

1. Only the experience on contracts that meet the following definition should be included in Part 7.

Loss sensitive contracts shall meet the following criteria:

- a. Contracts where an increase in losses on a policy can cause an increase in net payment (by the insured) for that policy.
 - b. The amount of additional payment (by the insured) must be at least 75% (50% for reinsurance contracts) of the additional losses, before application of aggregate and per accident/claimant limits or caps.
 - c. The net amount paid (by the insured) must also be able to differ by at least 20% (10% for reinsurance contracts), from highest to lowest possible charge in reaction to the loss experience.
 - d. The maximum possible payment by the insured should also be at least 15% (7.5% for reinsurance contracts) above what the insured would pay based on expected loss experience. In other words, the maximum charge should not approximate the expected charge.
 - e. The additional payment shall be in the form of additional premiums or additional commissions.
 - f. The additional losses and corresponding payments must flow through the income and balance sheets and cannot be “off-balance sheet.” For example, a deductible feature does not make a contract “loss sensitive” under this definition, as neither the losses under the deductible nor the reimbursements for these losses flow through the income statement.
2. Part 7 is only required of reporting entities who claim a reduction in their Risk-Based Capital for Loss Sensitive Contracts. Such reporting entities must complete the entire schedule in each year that they claim such credit.
 3. Part 7A provides experience on primary contracts. Part 7B provides experience on reinsurance contracts.

Section 1: Current Year Loss and LAE Reserves and Net Written Premium:

4. Column (1) should agree with the net loss and loss adjustment expense reserves (undiscounted) reported in the corresponding Part 1 of Schedule P.
5. Column (2) should reflect the corresponding values for Loss Sensitive Contracts only. Primary Loss Sensitive should include direct losses and expenses unpaid less reinsurance on those direct losses and expenses. Reinsurance Loss Sensitive should include unpaid assumed losses and expenses less any retrocessions on those losses and expenses.
6. Column (4) x 1000 should agree with the net written premiums reported in the Statement of Income page Underwriting and Investment Exhibit.
7. Column (5) should reflect the corresponding premium for Loss Sensitive Contracts only. Primary Loss Sensitive should include direct premiums written on loss sensitive contracts less reinsurance on those direct premiums. Reinsurance Loss Sensitive should include assumed loss sensitive premiums less any retroceded premiums.
8. Columns (3) and (6) are ratios of (2) to (1) and (5) to (4), respectively. Express as percentages showing one decimal place (e.g., 24.2%).

Sections 2 and 3: Loss Development:

9. In each row of Section 2 display the reported estimate of ultimate losses and DCC expense on all Loss Sensitive Contracts issued (i.e., with inception dates) in that year. Each reported estimate should be the estimate of cumulative ultimate loss and DCC expense as of ~~each the calendar~~ year-end corresponding to the column header, not the incremental amounts incurred during each calendar year. The resulting data should display the reported estimate of ultimate losses and DCC expense on a Policy Year basis.

One reasonability benchmark that can be used to verify that the data is presented on a Policy Year basis is to compare the magnitude of an issue year's ultimate loss and DCC expense estimates as of twelve months and as of twenty-four months. The valuation as of twenty-four months should be approximately twice as great as the valuation as of twelve months. (For example, the Issue Year 2004 estimate of ultimate losses and DCC expense at year-end 2005 should be approximately twice as great as the estimate of Issue Year 2004 ultimate losses and DCC expense at year-end 2004.) This reasonability benchmark assumes roughly even policy writings throughout the year. If a company's writings are proportionately greater in the first half of the year than the second half of the year, the valuation as of twelve months can reasonably be expected to be greater than 50% of the twenty-four-month valuation.

10. In each row of Section 3 show the bulk and IBNR reserves included in Section 2.

Sections 4 and 5: Premium Development:

11. In Section 4 of Schedule P for each year of issue, display the net earned premiums reported as of the calendar year-end corresponding to the column header~~at the end of each calendar year~~. Each reported estimate should be the estimate of cumulative net earned premium as of each year-end, not the incremental amounts earned during each calendar year. The resulting data should display the reported estimate of net earned premium on a Policy Year basis.

One reasonability benchmark that can be used to verify that the data is presented on a Policy Year basis is to compare the magnitude of an issue year's net earned premium as of twelve months and as of twenty-four months. The valuation as of twenty-four months should be approximately twice as great as the valuation as of twelve months. This reasonability benchmark assumes roughly even policy writings throughout the year. If a company's writings are proportionately greater in the first half of the year than the second half of the year, the valuation as of twelve months can reasonably be expected to be greater than 50% of the twenty-four-month valuation.

A second reasonability benchmark that can be used to verify the data presentation is to examine the ratio of Section 2 incurred loss and allocated expenses to Section 4 net earned premiums. The ratio of incurred losses to net earned premiums should all be similar at each valuation date. If Section 2 data is not on a policy year basis, but Section 4 is, or ~~vice versa~~ vice versa, the ratios as of twelve months will look very different than the ratios as of twenty-four months.

12. In Section 5 show separately any bulk assets or liabilities for future additional premiums or return of premiums included in the earned premium in Section 4. An entry denoting the expectation of future additional premiums should be displayed as a positive value. An entry denoting the expectation of future return premiums should be displayed as a negative value.
13. (Part 7B only): Loss Sensitive Reinsurance Contracts must be segmented between those on which premium is the adjustable element, and those on which commissions paid to the cedant are adjustable with losses. The premium development schedule (Sections 4 and 5, ~~Part 7B of Schedule P~~) should only include the experience of contracts with a variable premium.

Sections 6 and 7 (Part 7B only): Commission Development:

14. For all reinsurance contracts where the commission paid to the cedant varies with losses, display the development of that commission in Section 6 and display any assets or liabilities accrued in respect of the commission in Section 7. An entry denoting the expectation of future additional commissions to be paid should be displayed as a negative value. An entry denoting the expectation of future return commissions should be displayed as a positive value.

The Prior Row:

15. The “Prior” row in Sections 2 and 3 should display the reported estimate of ultimate losses and DCC ~~e~~Expense on a ~~p~~Policy ~~y~~Year basis for all policy years ten or more years older than the current policy year.
16. The “Prior” row in Sections 4 and 5 should display the reported estimate of net earned premium on a ~~p~~Policy ~~y~~Year basis for all policy years ten or more years older than the current policy year.

Formulas for Schedule P, Parts 2-4

Schedule P – Part 2 – Incurred Net Losses and Defense and Cost Containment Reported at Year-End

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|--------------|--|---|--|--|--|--|--|--|--|--|
| Prior | Case + Bulk + IBNR rsvs on <2016 @ Ye 2016 | paid in 2017 + rsvs on < 2016 @ ye 2017 | paid 2017 thru 2018 + rsvs on < 2016_@ ye 2018 | paid 2017 thru 2019 + rsvs on < 2016 @ ye 2019 | paid 2017 thru 2020 + rsvs on < 2016 @ ye 2020 | paid 2017 thru 2021 + rsvs on < 2016 @ ye 2021 | paid 2017 thru 2022 + rsvs on < 2016 @ ye 2022 | paid 2017 thru 2023 + rsvs on < 2016 @ ye 2023 | paid 2017 thru 2024 + rsvs on < 2016 @ ye 2024 | paid 2017 thru 2025 + rsvs on < 2016 @ ye 2025 |
| 2016 | paid in 2016 + rsvs on 2016 @ ye 2016 | paid thru 2017 + rsvs on 2016 @ ye 2017 | paid thru 2018 + rsvs on 2016 @ ye 2018 | paid thru 2019 + rsvs on 2016 @ ye 2019 | paid thru 2020 + rsvs on 2016 @ ye 2020 | paid thru 2021 + rsvs on 2016 @ ye 2021 | paid thru 2022 + rsvs on 2016 @ ye 2022 | paid thru 2023 + rsvs on 2016 @ ye 2023 | paid thru 2024 + rsvs on 2016 @ ye 2024 | paid thru 2025 + rsvs on 2016 @ ye 2025 |
| 2017 | | paid in 2017 + rsvs on 2017 @ ye 2017 | paid thru 2018 + rsvs on 2017 @ ye 2018 | paid thru 2019 + rsvs on 2017 @ ye 2019 | paid thru 2020 + rsvs on 2017 @ ye 2020 | paid thru 2021 + rsvs on 2017 @ ye 2021 | paid thru 2022 + rsvs on 2017 @ ye 2022 | paid thru 2023 + rsvs on 2017 @ ye 2023 | paid thru 2024 + rsvs on 2017 @ ye 2024 | paid thru 2025 + rsvs on 2017 @ ye 2025 |
| 2018 | | | paid in 2018 + rsvs on 2018 @ ye 2018 | paid thru 2019 + rsvs on 2018 @ ye 2019 | paid thru 2020 + rsvs on 2018 @ ye 2020 | paid thru 2021 + rsvs on 2018 @ ye 2021 | paid thru 2022 + rsvs on 2018 @ ye 2022 | paid thru 2023 + rsvs on 2018 @ ye 2023 | paid thru 2024 + rsvs on 2018 @ ye 2024 | paid thru 2025 + rsvs on 2018 @ ye 2025 |
| 2019 | | | | paid in 2019 + rsvs on 2019 @ ye 2019 | paid thru 2020 + rsvs on 2019 @ ye 2020 | paid thru 2021 + rsvs on 2019 @ ye 2021 | paid thru 2022 + rsvs on 2019 @ ye 2022 | paid thru 2023 + rsvs on 2019 @ ye 2023 | paid thru 2024 + rsvs on 2019 @ ye 2024 | paid thru 2025 + rsvs on 2019 @ ye 2025 |
| 2020 | | | | | paid in 2020 + rsvs on 2020 @ ye 2020 | paid thru 2021 + rsvs on 2020 @ ye 2021 | paid thru 2022 + rsvs on 2020 @ ye 2022 | paid thru 2023 + rsvs on 2020 @ ye 2023 | paid thru 2024 + rsvs on 2020 @ ye 2024 | paid thru 2025 + rsvs on 2020 @ ye 2025 |
| 2021 | | | | | | paid in 2021 + rsvs on 2021 @ ye 2021 | paid thru 2022 + rsvs on 2021 @ ye 2022 | paid thru 2023 + rsvs on 2021 @ ye 2023 | paid thru 2024 + rsvs on 2021 @ ye 2024 | paid thru 2025 + rsvs on 2021 @ ye 2025 |
| 2022 | | | | | | | paid in 2022 + rsvs on 2022 @ ye 2022 | paid thru 2023 + rsvs on 2022 @ ye 2023 | paid thru 2024 + rsvs on 2022 @ ye 2024 | paid thru 2025 + rsvs on 2022 @ ye 2025 |
| 2023 | | | | | | | | paid in 2023 + rsvs on 2023 @ ye 2023 | paid thru 2024 + rsvs on 2023 @ ye 2024 | paid thru 2025 + rsvs on 2023 @ ye 2025 |
| 2024 | | | | | | | | | paid in 2024 + rsvs on 2024 @ ye 2024 | paid thru 2025 + rsvs on 2024 @ ye 2025 |
| 2025 | | | | | | | | | | paid in 2025 + rsvs on 2025 @ ye 2025 |

Notes Figures are net of reinsurance, subrogation, and salvage.

| | |
|--|---|
| | Reserves Only. Subsequent development relates only to subsequent payments and reserves. |
| | From Part 1: Column 11 - (Column 8 - Column 9) + Column 24 - (Column 21 - Column 22), <u>plus any tabular discount netted from the loss reserves in Column 24</u> |

Schedule P-- Part 3 – Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year-End

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | Number of Claims Closed With Loss Payment | Number of Claims Closed Without Loss Payment |
|-------|----------------------|-------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|---|--|
| Prior | 000 | paid in 2017 on < 2016* | paid 2017 thru 2018 on < 2016 | paid 2017 thru 2019 on < 2016 | paid 2017 thru 2020 on < 2016 | paid 2017 thru 2021 on < 2016 | paid 2017 thru 2022 on < 2016 | paid 2017 thru 2023 on < 2016 | paid 2017 thru 2024 on < 2016 | paid 2017 thru 2025 on < 2016 | | |
| 2016 | paid in 2016 on 2016 | paid thru 2017 on 2016 | paid thru 2018 on 2016 | paid thru 2019 on 2016 | paid thru 2020 on 2016 | paid thru 2021 on 2016 | paid thru 2022 on 2016 | paid thru 2023 on 2016 | paid thru 2024 on 2016 | paid thru 2025 on 2016 | | |
| 2017 | | paid in 2017 on 2017 | paid thru 2018 on 2017 | paid thru 2019 on 2017 | paid thru 2020 on 2017 | paid thru 2021 on 2017 | paid thru 2022 on 2017 | paid thru 2023 on 2017 | paid thru 2024 on 2017 | paid thru 2025 on 2017 | | |
| 2018 | | | paid in 2018 on 2018 | paid thru 2019 on 2018 | paid thru 2020 on 2018 | paid thru 2021 on 2018 | paid thru 2022 on 2018 | paid thru 2023 on 2018 | paid thru 2024 on 2018 | paid thru 2025 on 2018 | | |
| 2019 | | | | paid in 2019 on 2019 | paid thru 2020 on 2019 | paid thru 2021 on 2019 | paid thru 2022 on 2019 | paid thru 2023 on 2019 | paid thru 2024 on 2019 | paid thru 2025 on 2019 | | |
| 2020 | | | | | paid in 2020 on 2020 | paid thru 2021 on 2020 | paid thru 2022 on 2020 | paid thru 2023 on 2020 | paid thru 2024 on 2020 | paid thru 2025 on 2020 | | |
| 2021 | | | | | | paid in 2021 on 2021 | paid thru 2022 on 2021 | paid thru 2023 on 2021 | paid thru 2024 on 2021 | paid thru 2025 on 2021 | | |
| 2022 | | | | | | | paid in 2022 on 2022 | paid thru 2023 on 2022 | paid thru 2024 on 2022 | paid thru 2025 on 2022 | | |
| 2023 | | | | | | | | paid in 2023 on 2023 | paid thru 2024 on 2023 | paid thru 2025 on 2023 | | |
| 2024 | | | | | | | | | paid in 2024 on 2024 | paid thru 2025 on 2024 | | |
| 2025 | | | | | | | | | | paid in 2025 on 2025 | | |

Notes: Figures are net of reinsurance.
 Figures are net of salvage and subrogation received.
 * "on < 2016" here means "on net loss and DCC expense reserves established by the company as of 12/31/16 for incurred years prior to 2016"

From Part 1: Column 4 - Column 5 + Column 6 - Column 7
 (or Column 11 - (Column 8 - Column 9))

**Schedule P - Part 4 - Bulk and INBR Reserves on Net Losses and DCC Expenses
Reported at Year End**

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|--------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Prior | rsvs ye 2016 on < 2016 | rsvs ye 2017 on < 2016 | rsvs ye 2018 on < 2016 | rsvs ye 2019 on < 2016 | rsvs ye 2020 on < 2016 | rsvs ye 2021 on < 2016 | rsvs ye 2022 on < 2016 | rsvs ye 2023 on < 2016 | rsvs ye 2024 on < 2016 | rsvs ye 2025 on < 2016 |
| 2016 | rsvs ye 2016 on 2016-ay | rsvs ye 2017 on 2016-ay | rsvs ye 2018 on 2016-ay | rsvs ye 2019 on 2016-ay | rsvs ye 2020 on 2016-ay | rsvs ye 2021 on 2016-ay | rsvs ye 2022 on 2016-ay | rsvs ye 2023 on 2016-ay | rsvs ye 2024 on 2016-ay | rsvs ye 2025 on 2016-ay |
| 2017 | | rsvs ye 2017 on 2017-ay | rsvs ye 2018 on 2017-ay | rsvs ye 2019 on 2017-ay | rsvs ye 2020 on 2017-ay | rsvs ye 2021 on 2017-ay | rsvs ye 2022 on 2017-ay | rsvs ye 2023 on 2017-ay | rsvs ye 2024 on 2017-ay | rsvs ye 2025 on 2017-ay |
| 2018 | | | rsvs ye 2018 on 2018-ay | rsvs ye 2019 on 2018-ay | rsvs ye 2020 on 2018-ay | rsvs ye 2021 on 2018-ay | rsvs ye 2022 on 2018-ay | rsvs ye 2023 on 2018-ay | rsvs ye 2024 on 2018-ay | rsvs ye 2025 on 2018-ay |
| 2019 | | | | rsvs ye 2019 on 2019-ay | rsvs ye 2020 on 2019-ay | rsvs ye 2021 on 2019-ay | rsvs ye 2022 on 2019-ay | rsvs ye 2023 on 2019-ay | rsvs ye 2024 on 2019-ay | rsvs ye 2025 on 2019-ay |
| 2020 | | | | | rsvs ye 2020 on 2020-ay | rsvs ye 2021 on 2020-ay | rsvs ye 2022 on 2020-ay | rsvs ye 2023 on 2020-ay | rsvs ye 2024 on 2020-ay | rsvs ye 2025 on 2020-ay |
| 2021 | | | | | | rsvs ye 2021 on 2021-ay | rsvs ye 2022 on 2021-ay | rsvs ye 2023 on 2021-ay | rsvs ye 2024 on 2021-ay | rsvs ye 2025 on 2021-ay |
| 2022 | | | | | | | rsvs ye 2022 on 2022-ay | rsvs ye 2023 on 2022-ay | rsvs ye 2024 on 2022-ay | rsvs ye 2025 on 2022-ay |
| 2023 | | | | | | | | rsvs ye 2023 on 2023-ay | rsvs ye 2024 on 2023-ay | rsvs ye 2025 on 2023-ay |
| 2024 | | | | | | | | | rsvs ye 2024 on 2024-ay | rsvs ye 2025 on 2024-ay |
| 2025 | | | | | | | | | | rsvs ye 2025 on 2025-ay |

Notes: Figures are net of reinsurance.

From Part 1: Column 15 - Column 16 + Column 19 - Column 20, plus any tabular discount netted from the reserves in Part 1

Earned Premium Development for Schedule P, Part 6

Example

Rows 1 and 2 of the 2023 Part 6 are shown because these rows can be used to calculate Row 1 of the 2024 Part 6.

Annual Statement for the Year 2023 of the XYZ Insurance Company
 Schedule P – Part 6
 Cumulative Premiums Earned Direct and Assumed at Year End

| Year in Which Premiums Were Earned and Losses Were Incurred | CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END (\$000 OMITTED) | | | | | | | | | | Current Year Premiums Earned |
|---|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|------------------------------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | |
| | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | |
| 1. Prior | 9,900 | 1,900 | 1,200 | (1,500) | (2,400) | 2,100 | (300) | (1,100) | 0 | 0 | 0 |
| 2. 2014 | 112,000 | 121,000 | 126,100 | 126,600 | 126,000 | 127,500 | 126,300 | 124,500 | 124,500 | 124,400 | (100) |
| ... | | | | | | | | | | | |

Annual Statement for the Year 2024 of the XYZ Insurance Company
 Schedule P – Part 6
 Cumulative Premiums Earned Direct and Assumed at Year End

| Year in Which Premiums Were Earned and Losses Were Incurred | CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END (\$000 OMITTED) | | | | | | | | | | Current Year Premiums Earned |
|---|---|--------------------------|--------------------|---------------------------------|-------------------------------|---------------------------------|---------------------------------|--------------------|---------------------------|--------------------|--------------------------------------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | |
| | 2015 6 | 2016 7 | 2017 8 | 2018 9 | 2019 20 | 2020 1 | 2021 2 | 2022 3 | 2023 4 | 2024 5 | |
| 1. Prior | 10,900 0 00 | 6,300 00 0 | (1,000) 4,000 | 3,000 (3,000) 000 | 2,200 3,600 600 | 1,500 (1,500) 500 | 1,000 (2,900) 900 | 600 | 300 (100)) | 100 | 0 100 |
| 2. 2015 6 | 130,000 350,000 | 354,000 139,000 | 356,000 146,000 | 357,000 146,000 | 357,800 146,000 | 358,500 144,000 | 359,000 142,000 | 359,400 142,000 | 359,700 143,000 | 143,000 359,900 | 0 200 |
| 3. 2016 7 | xxxx | 164,000 355,000 | 359,000 181,000 | 361,000 187,000 | 362,000 187,000 | 362,800 186,000 | 363,500 185,000 | 364,000 182,000 | 182,000 364,400 | 182,000 364,700 | 0 300 |
| 4. 2017 8 | | xxxx | 213,000 360,000 | 364,000 234,000 | 366,000 239,000 | 367,000 241,000 | 367,800 240,000 | 368,500 235,000 | 369,000 233,000 | 369,400 233,000 | 400 0 |
| 5. 2018 9 | | | xxxx | 217,000 365,000 | 369,000 225,000 | 371,000 229,000 | 372,000 229,000 | 372,800 227,000 | 373,500 222,000 | 374,000 222,000 | 500 0 |
| 6. 2019 20 | | | | xxxx | 239,000 370,000 | 374,000 252,000 | 376,000 256,000 | 377,000 258,000 | 377,800 255,000 | 378,500 253,000 | 600 (2,000)) |
| 7. 2020 1 | | | | | xxxx | 253,000 375,000 | 379,000 256,000 | 381,000 259,000 | 382,000 259,000 | 382,800 255,000 | 700 (4,000)) |
| 8. 2021 2 | | | | | | xxxx | 258,000 380,000 | 384,000 280,000 | 386,000 285,000 | 387,000 284,000 | 1,000 (1,000) 00) |
| 9. 2022 3 | | | | | | | xxxx | 263,000 385,000 | 389,000 285,000 | 391,000 289,000 | 4,000 2,000 0 |
| 10. 2023 4 | | | | | | | | xxxx | 279,000 390,000 | 394,000 294,000 | 4,000 15,000 00 |
| 11. 2024 5 | | | | | | | | | xxxx | 305,000 395,000 | 395,000 305,000 05,000 |
| 12. Totals | | | | | | | | | | xxxx | 317,000 405,000 |

| | | | | | | | | | | | |
|--|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|------|
| <u>13. Earned Premiums (Sch P-Pt. 1)</u> | <u>140,900</u> | <u>179,300</u> | <u>236,000</u> | <u>241,000</u> | <u>255,600</u> | <u>267,500</u> | <u>258,100</u> | <u>280,000</u> | <u>296,900</u> | <u>317,000</u> | |
| Schedule P Part 1 EP | 360,000 | 365,000 | 370,000 | 375,000 | 380,000 | 385,000 | 390,000 | 395,000 | 400,000 | 405,000 | XXXX |

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NAIC BLANKS (E) WORKING GROUP

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| <p style="text-align: right;">DATE: <u>5/13/2026</u></p> <p>CONTACT PERSON: <u>Charles Therriault</u></p> <p>TELEPHONE: <u>212-386-1920</u></p> <p>EMAIL ADDRESS: <u>ctherriault@naic.org</u></p> <p>ON BEHALF OF: <u>Investment Designation Analysis (E) Working Group (IDAWG)</u></p> <p>NAME: <u>Ken Cotrone</u></p> <p>TITLE: <u>Chair IDAWG</u></p> <p>AFFILIATION: <u>Connecticut DOI</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-15BWG</u> Year <u>2027</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
|---|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

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|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input checked="" type="checkbox"/> CROSSCHECKS |
| <input checked="" type="checkbox"/> QUARTERLY STATEMENT | <input checked="" type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input checked="" type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input checked="" type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the "CUSIP" column throughout the annual and quarterly investment schedules to be a "Security Identifier" column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. Also add a Security ID Type column to the investment schedules to identify what security identifier is being used. Remove electronic only ISIN column because the ISIN will now be reported in the Security Identifier column. Update references to CUSIP throughout the annual and quarterly statement to be Security Identifier when the instructions are not specifically referring to CUSIP.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to improve investment security identification and integration with other NAIC systems, data, and reporting.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

The following definitions apply to the investment schedules.

SAP Book Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

Original Cost, including capitalized acquisition costs and accumulated depreciation, unamortized premium and discount, deferred origination and commitment fees, direct write-downs, and increase/(decrease) by adjustment.

SAP Carrying Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

The SAP Book Value plus accrued interest and reduced by any valuation allowance (IF APPLICABLE) and any nonadmitted adjustment applied to the individual investment. Carrying Value is used in the determination of impairment.

Adjusted Carrying Value:

Carrying Value amount adjusted to remove any accrued interest and to add back any of the following amounts: individual nonadmitted amounts, individual valuation allowances (IF APPLICABLE), and aggregate valuation allowance (IF APPLICABLE). In effect, this is equivalent to the definition of SAP Book Value (not to be confused with the old “Book Value” reported in the annual statement blanks for data years 2000 and prior).

Recorded Investment:

The SAP Book Value (Adjusted Carrying Value) plus accrued interest.

The information included in the investment schedules shall be broken down to the level of detail as required when all columns and rows are considered together unless otherwise addressed in specific instructions. For example, on Schedule D Part 4, a reporting entity is required to list the CUSIP-security identifier book/adjusted carrying value, among other things. The reporting entity would only be required to break this information down to a lower level of detail if the information was inaccurate if reported in the aggregate. Thus, the reporting entity would not be required to break the information down by lot (information for each individual purchase) and could utilize the information for book/adjusted carrying value using an average cost basis, or some other method, provided the underlying data reported in that cell was calculated in accordance with the *Accounting Practices and Procedures Manual*. However, reporting entities are not precluded from reporting the information at a more detailed level (by lot) if not opposed by their domiciliary commissioner.



SCHEDULE BA – PART 1**OTHER LONG-TERM INVESTED ASSETS OWNED DECEMBER 31 OF CURRENT YEAR**

Refer to SSAP No. 23—*Foreign Currency Transactions and Translations* for accounting guidance.

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

~~If no CUSIP number exists, the CUSIP field should be zero filled.~~

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE BA – PART 2**OTHER LONG-TERM INVESTED ASSETS ACQUIRED AND ADDITIONS MADE DURING THE YEAR**

This schedule should reflect not only those newly acquired long-term invested assets, but also any increases or additions to long-term invested assets acquired in the current and prior periods, including, for example, capital calls from existing limited partnerships.

Column 1 – CUSIP Identification Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no CUSIP number exists, the CUSIP field should be zero filled. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “00000000”. This is a temporary security identifier of “00000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “99999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “99999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE BA – PART 3**OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAID DURING THE YEAR**

This schedule should reflect not only disposals of an entire “other invested asset” but should also include partial disposals and amounts received during the year on investments still held, including, for example, return of capital distributions from limited partnerships.

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no CUSIP number exists, the CUSIP field should be zero filled. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “00000000”. This is a temporary security identifier of “00000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “99999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “99999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE D – PART 1- SECTION 1**LONG-TERM BONDS – ISSUER CREDIT OBLIGATIONS OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

The security identifier reported (~~Column 1 for CUSIP, CINS, PPN or Column 36 for ISIN~~) must be the same as the identifier used when filing securities with the NAIC pursuant to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* instructions.

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 36. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

Detail Eliminated To Conserve Space

Column ~~33~~34 – PIK Interest

Include the amount of reported interest in which the terms of the investment permit paid “in kind” (PIK) instead of cash.

The amount captured shall reflect the cumulative amount of PIK interest included in the current principal balance.

In disclosing the cumulative amount of PIK interest, identify the specific amounts of PIK interest by lot and aggregate the amounts by CUSIP/PPN security identifier that have a net increase to the original par value. The net increase includes PIK interest added to the par value less disposals (i.e., repayments; sales) that are first applied to any PIK interest outstanding. As a practical expedient, an insurer may calculate the cumulative amount of PIK interest on a bond by subtracting the original principal / par value from the current principal / par value, but not less than \$0.

Detail Eliminated To Conserve Space

Column 36 — ISIN Identification

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 1 – SECTION 2**ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

The security identifier reported (~~Column 1 for CUSIP, CINS, PPN or Column 37 for ISIN~~) must be the same as the identifier used when filing securities with the NAIC pursuant to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* instructions.

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 37. LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space



Column 3435 – PIK Interest

Include the amount of reported interest in which the terms of the investment permit paid “in kind” (PIK) instead of cash.

The amount captured shall reflect the cumulative amount of PIK interest included in the current principal balance.

In disclosing the cumulative amount of PIK interest, identify the specific amounts of PIK interest by lot and aggregate the amounts by CUSIP/PPN security identifier that have a net increase to the original par value. The net increase includes PIK interest added to the par value less disposals (i.e., repayments; sales) that are first applied to any PIK interest outstanding. As a practical expedient, an insurer may calculate the cumulative amount of PIK interest on a bond by subtracting the original principal / par value from the current principal / par value, but not less than \$0.



Detail Eliminated To Conserve Space



Column 37 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 2 – SECTION 1

PREFERRED STOCKS OWNED DECEMBER 31 OF CURRENT YEAR



Column 1 – CUSIP Identification Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 27. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Column 27 — ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 2 – SECTION 2**COMMON STOCKS OWNED DECEMBER 31 OF CURRENT YEAR****Detail Eliminated To Conserve Space**

Column 1 – CUSIP Identification Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 25. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

Detail Eliminated To Conserve Space

Column 25 — ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 3**LONG-TERM BONDS AND STOCKS ACQUIRED DURING CURRENT YEAR**

This schedule should include a detailed listing of all securities that were purchased/acquired during the current reporting year that are still owned as of the end of the current reporting year (amounts purchased and sold during the current reporting year are reported in detail on Schedule D, Part 5 and only in subtotal in Schedule D, Part 3). This should include all transactions that adjust the cost basis of the securities. Thus, it should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or other situations such as CUSIP number/security identifier changes. The following list of items provides examples of the items that should be included:

=====Detail Eliminated To Conserve Space=====

Column 1 – CUSIP Identification/Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 14. LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "00000000". This is a temporary security identifier of "00000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "99999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "99999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

**=====
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Detail Eliminated To Conserve Space
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Column 14 — ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 4

LONG-TERM BONDS AND STOCKS SOLD, REDEEMED OR OTHERWISE DISPOSED OF DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were sold/disposed of during the current reporting year that were owned as of the beginning of the current reporting year (amounts purchased and sold during the current reporting year are reported in detail on Schedule D, Part 5 and only in subtotal in Schedule D, Part 4). This should include all transactions that adjust the cost basis of the securities (except other-than-temporary impairments that are not part of a disposal transaction). This schedule should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or situations that only involve CUSIP number/security identifier changes. The following list of items provides examples (not all inclusive) of the items that should be included:



Detail Eliminated To Conserve Space

Column 1 – CUSIP Identification Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 26. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

SCHEDULE D – PART 5

LONG-TERM BONDS AND STOCKS ACQUIRED DURING THE YEAR AND FULLY DISPOSED OF DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were both purchased/acquired and sold/disposed of during the current reporting year (amounts purchased and sold during the current reporting year are also reported in subtotals in Schedule D, Parts 3 and 4).

Reporting entities should track information separately for securities purchased in different lots rather than using some type of averaging for the issue in aggregate. Thus, this schedule should only be used when an entire lot of a security has been purchased and sold during the current reporting year (even when different lots of the same security still exist on the reporting entity’s books).

As with Schedule D, Parts 3 and 4, this schedule should be used for transactions that affect the cost basis of the securities. This schedule should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or situations that only involve CUSIP number/security identifier changes. Refer to the examples on Schedule D, Part 4 of transactions that should be captured.



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 26.~~ LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Column 26 — ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 6 – SECTION 1

VALUATION OF SHARES OF SUBSIDIARY, CONTROLLED OR AFFILIATED COMPANIES



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 14.~~ LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space

Column 14 — ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE DB – PART A – SECTION 1

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS, AND FORWARDS OPEN
DECEMBER 31 OF CURRENT YEAR



Detail Eliminated To Conserve Space

Column 2 – Description of Item(s) Hedged, Used for Income Generation or Replicated

Describe the assets or liabilities hedged, including CUSIP(s)security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the CUSIP-security identifier and a complete and accurate description of the bond; if multiple CUSIPssecurity identifiers, note that there are multiple CUSIPs-security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART A – SECTION 2

**OPTIONS, CAPS, FLOORS, COLLARS, SWAPS, AND FORWARDS TERMINATED
DURING CURRENT YEAR**



Column 2 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 1

FUTURES CONTRACTS OPEN
DECEMBER 31 OF CURRENT YEAR



Detail Eliminated To Conserve Space

Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including CUSIP(s)security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the CUSIPsecurity identifier and a complete and accurate description of the bond; if multiple CUSIPssecurity identifiers, note that there are multiple CUSIPssecurity identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 2

**FUTURES CONTRACTS TERMINATED
DURING CURRENT YEAR**



Detail Eliminated To Conserve Space

Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART C – SECTION 1**REPLICATION (SYNTHETIC ASSET) TRANSACTIONS (RSAT) OPEN
ON DECEMBER 31 OF CURRENT YEAR**

Include all RSATs owned December 31 of current year, including those open on December 31 of the previous year, and those acquired during the current year.

Column 1 – RSAT Number

Enter the RSAT Number Security ID that was filed with the NAIC's Securities Valuation Office (SVO) pursuant to the instructions in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office (P&P Manual)*, as administered by the CUSIP Division of Standard & Poor's.

**=====
↓ ↑ **Detail Eliminated To Conserve Space** ↓ ↑ =====**

Column 12 – CUSIP Security Identifier of Cash Instrument(s) Held

Enter the CUSIP security identifier or Investment Number of the Cash Instrument(s) used in the RSAT as the instrument appears on the appropriate investment schedule.

- (a) CUSIP digits 1-6: Issuer number
- (b) CUSIP digits 7-8: Exact issue sequence
- (c) CUSIP digit 9: Check digit

Column 13 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE DB – PART D – SECTION 2**COLLATERAL FOR DERIVATIVE INSTRUMENTS OPEN**
DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 3 – CUSIP Identification Security Identifier

Enter the CUSIP/PPN/CINS security identifier number of the asset pledged or received as collateral, when appropriate. If no CUSIP/PPN/CINS security identifier number exists, the field should be zero-filled.

Column 4 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
 (Securities lending collateral assets reported in aggregate on Line 10 of the Asset page
 (Line 9 for Separate Accounts) and not included on Schedules A, B, BA, D, DB, and E)



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in (Column 12).~~ LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

The ~~CUSIP~~ security identifier reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

- Lines 0019999999 through 0509999999 Schedule D, Part 1, Section 1, Column 1
- Lines 1019999999 through 1909999999 Schedule D, Part 1, Section 2, Column 1
- Lines 4019999999 through 4509999999 Schedule D, Part 2, Section 1, Column 1
- Lines 5019999999 through 5989999999 Schedule D, Part 2, Section 2, Column 1
- Line 9409999999..... Schedule BA, Part 1, Column 1
- Line 9709999999..... Schedule E, Part 2, Column 1

The ~~CUSIP number~~ security identifier should be zero-filled for the following lines:

Real Estate (Schedule A type)9209999999

| | |
|---|------------|
| Mortgage Loans on Real Estate (Schedule B type) | 9309999999 |
| Short-Term Invested Assets (Schedule DA, Part 1 type) | 9509999999 |
| Cash (Schedule E, Part 1 type) | 9609999999 |
| Other Assets..... | 9809999999 |

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Column 12 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

| | |
|---|--|
| Lines 0019999999 through 0509999999 | Schedule D, Part 1, Section 1, Column 36 |
| Lines 1019999999 through 1909999999 | Schedule D, Part 1, Section 2, Column 37 |
| Lines 4019999999 through 4509999999 | Schedule D, Part 2, Section 1, Column 27 |
| Lines 5019999999 through 5989999999 | Schedule D, Part 2, Section 2, Column 25 |

The ISIN number should be zero-filled for the following lines:

| | |
|--|------------|
| Real Estate (Schedule A type) | 9209999999 |
| Mortgage Loans on Real Estate (Schedule B type) | 9309999999 |
| Other Invested Assets (Schedule BA type)..... | 9409999999 |
| Short-Term Invested Assets (Schedule DA, Part 1 type)..... | 9509999999 |
| Cash (Schedule E, Part 1 type)..... | 9609999999 |
| Cash Equivalents (Schedule E, Part 2 type)..... | 9709999999 |
| Other Assets..... | 9809999999 |

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB, and E
and not reported in aggregate on Line 10 of the Asset page (Line 9 for Separate Accounts))



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in (Column 12).~~ LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

The ~~CUSIP~~ security identifier reported for this column should be same for the security as reported in other schedules for the lines shown below:

- Lines 0019999999 through 0509999999 Schedule D, Part 1, Section 1, Column 1
- Lines 1019999999 through 1909999999 Schedule D, Part 1, Section 2, Column 1
- Lines 4019999999 through 4509999999 Schedule D, Part 2, Section 1, Column 1
- Lines 5019999999 through 5989999999 Schedule D, Part 2, Section 2, Column 1
- Line 9409999999..... Schedule BA, Part 1, Column 1
- Line 9709999999..... Schedule E, Part 2, Column 1

The ~~CUSIP number~~ security identifier should be zero-filled for the following lines:

Real Estate (Schedule A)9209999999

| | |
|--|------------|
| Mortgage Loans on Real Estate (Schedule B) | 9309999999 |
| Short-Term Invested Assets (Schedule DA, Part 1) | 9509999999 |
| Cash (Schedule E, Part 1) | 9609999999 |
| Other Assets..... | 9809999999 |

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space

Column 12 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be same for the security as reported in other schedules for the lines shown below:

| | |
|---|--|
| Lines 0019999999 through 0509999999 | Schedule D, Part 1, Section 1, Column 36 |
| Lines 1019999999 through 1909999999 | Schedule D, Part 1, Section 2, Column 37 |
| Lines 4019999999 through 4509999999 | Schedule D, Part 2, Section 1, Column 27 |
| Lines 5019999999 through 5989999999 | Schedule D, Part 2, Section 2, Column 25 |

The ISIN number should be zero filled for the following lines:

| | |
|--|------------|
| Real Estate (Schedule A) | 9209999999 |
| Mortgage Loans on Real Estate (Schedule B) | 9309999999 |
| Other Invested Assets (Schedule BA)..... | 9409999999 |
| Short-Term Invested Assets (Schedule DA, Part 1) | 9509999999 |
| Cash (Schedule E, Part 1) | 9609999999 |
| Cash Equivalents (Schedule E, Part 2)..... | 9709999999 |
| Other Assets..... | 9809999999 |

SCHEDULE E – PART 2 – CASH EQUIVALENTS



Detail Eliminated To Conserve Space



Column 1 – ~~CUSIP Identification~~ Security Identifier

~~CUSIP identification~~ A security identifier is **required and valid only** for Exempt Money Market Mutual Funds – as Identified by SVO (Line 8209999999) and All Other Money Market Mutual Funds (Line 8309999999).

SUPPLEMENTAL INVESTMENT RISKS INTERROGATORIES**Detail Eliminated To Conserve Space**

Line 2 – Report the single 10 largest exposures to a single issuer/borrower/investment.

Determine the ten largest exposures by first, aggregating investments from all investment categories (except the excluded categories) by issuer/issuing entity. ~~The first six digits of the CUSIP number can be used as a starting point; however, please note that the same issuer may have more than one unique series of the first six digits of the CUSIP.~~ Report the aggregate exposure to the same issuing entity. For example, the reporting entity owns bonds issued by the XYZ Company of \$500,000 and common stock of the XYZ Company of \$600,000. In addition, the reporting entity has a mortgage loan to the XYZ Company of \$300,000. The total exposure to Issuer XYZ Company is \$1.4 million (\$500,000+\$600,000+\$300,000).

For funds that are not diversified within the meaning of the Investment Company Act of 1940, insurance reporting entities are required to identify actual exposures and aggregate those exposures with directly held investments to determine the 10 largest exposures. For example, if a reporting entity directly holds a significant number of investments in Exxon Mobil and holds a non-diversified closed-end fund with a high concentration of Exxon Mobil, the reporting entity shall aggregate the direct investments with the investments in the closed-end funds to determine the aggregate investment risk to Exxon Mobil.

SEC registered investment funds are required by law to disclose holdings within 60 days following the fund's fiscal quarter end. Insurers who own funds classified as "non-diversified" are to use the last publicly available fund holding disclosure to account for holdings that should be included in their Top 10 holdings.

Exclude: U.S. Government and U. S. Government Agency securities listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* as "Securities That Are Considered "Exempt Obligations" For Purposes of Determining The Asset Valuation Reserve and The Risk-Based Capital Calculation";

Those U.S. Government money market funds listed on "NAIC U.S. Direct Obligations/Full Faith and Credit Exemption List Money Market Fund List" found on the Securities Valuation Office Web page (<https://www.naic.org/svo.htm>);

Property occupied by the company

Policy loans

All SEC and foreign registered funds (open-end, closed end, UIT, and ETFs) and common trust funds that are diversified within the meaning of the Investment Company Act of 1940 [Section 5(b) (1)].

In Column 2, list the categories of securities that are included in the total for each issuer (e.g., bonds, mortgage loans, etc.)

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL & SEPARATE ACCOUNTS**ASSET VALUATION RESERVE****REPLICATION (SYNTHETIC) ASSETS –
BASIC CONTRIBUTION, RESERVE OBJECTIVE, AND MAXIMUM RESERVE CALCULATIONS**

This worksheet should contain a line for each replicated (synthetic) asset and each cash instrument component of all replication (synthetic asset) transactions undertaken by the reporting entity. The assets should be sorted first by RSAT number, next by type (replicated assets first then cash instruments) and finally by CUSIP Security Identifier and Security ID Type.

Column 1 – RSAT Number

The RSAT number for each transaction should be that used in Schedule DB, Part C, Section 1.

Column 2 – Type

Enter:

“R” For replicated asset, if the line describes one of the replicated (synthetic) assets,

“CW” For cash instrument with credit, if the line describes one of the cash instruments constituting the transaction and the transaction either:

- (1) Is a swap of prospectively determined interest rates or
- (2) Eliminates the asset risk associated with the cash instrument

“CN” For cash instrument with no credit, if the line describes one of the cash instruments constituting the transaction and the transaction does not eliminate the reporting entity’s exposure to the asset risk associated with the instrument.

Column 3 – CUSIP Security Identifier

Show the CUSIP security identifier for all cash instruments that are securities.

Column 4 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)

P - PPN

L - LXID

I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

QUARTERLY STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

The following definitions apply to the investment schedules.

SAP Book Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

Original Cost, including capitalized acquisition costs and accumulated depreciation, unamortized premium and discount, deferred origination and commitment fees, direct write-downs and increase/decrease by adjustment.

SAP Carrying Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

The SAP Book Value plus accrued interest and reduced by any valuation allowance (IF APPLICABLE) and any nonadmitted adjustment applied to the individual investment. Carrying Value is used in the determination of impairment.

Adjusted Carrying Value:

Carrying Value amount adjusted to remove any accrued interest and to add back any of the following amounts: individual nonadmitted amounts, individual valuation allowances (IF APPLICABLE), and aggregate valuation allowance (IF APPLICABLE). In effect, this is equivalent to the definition of SAP Book Value (not to be confused with the old “Book Value” reported in the annual statement blanks for data years 2000 and prior).

Recorded Investment:

The SAP Book Value (Adjusted Carrying Value) plus accrued interest.

The information included in the investment schedules shall be broken down to the level of detail as required when all columns and rows are considered together unless otherwise addressed in specific instructions. For example, on Schedule D, Part 4, a reporting entity is required to list the CUSIP-security identifier book/adjusted carrying value, among other things. The reporting entity would only be required to break this information down to a lower level of detail if the information were inaccurate if reported in the aggregate. Thus, the reporting entity would not be required to break the information down by lot (information for each individual purchase) and could utilize the information for book/adjusted carrying value using an average cost basis, or some other method, provided the underlying data reported in that cell was calculated in accordance with the *Accounting Practices and Procedures Manual*. However, reporting entities are not precluded from reporting the information at a more detailed level (by lot) if not opposed by their domiciliary commissioner.


Detail Eliminated To Conserve Space

SCHEDULE BA – PART 3

**OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAID
DURING THE CURRENT QUARTER**

This schedule should reflect not only disposals of an entire “other invested asset” but should also include partial disposals and amounts received during the year on investments still held, including, for example, return of capital distributions from limited partnerships.

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: www.cusip.com/cusip/index.htm.

If no CUSIP number exists, the CUSIP field should be zero filled. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



SCHEDULE D – PART 3

LONG-TERM BONDS AND STOCKS ACQUIRED DURING THE CURRENT QUARTER

This schedule should include a detail listing of all securities that were purchased/acquired during the current reporting quarter. Detailed information for investments that are acquired and disposed of during the current reporting quarter should be included in this schedule and in Schedule D, Part 4. Note that this is not a detailed listing of items for the Year-to-Date. This should include all transactions that adjust the cost basis of the securities. Thus, it should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3, or other situations such as CUSIP number/security identifier changes. The following list of items provides examples of the items that should be included:

Detail Eliminated To Conserve Space

Column 1 – CUSIP Identification/Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services:

www.cusip.com/cusip/index.htm

If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 15. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space



Column 15 ——— ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space



Column ~~21~~22 - NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol

Provide the appropriate combination of the NAIC Designation (1 through 6), NAIC Designation Modifier (A through G) and SVO Administrative Symbol (see below) at date of disposal for each security shown. The list of valid SVO Administrative Symbols is shown below.

Where multiple disposal transactions occurred for the same ~~CUSIP~~security identifier, and those transactions are summarized on one line, enter the appropriate combination of NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol for the last disposal using the last available designation.



Detail Eliminated To Conserve Space



Column ~~27~~ - ISIN Identification

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE DB – PART A – SECTION 1

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS AND FORWARDS OPEN



Column 2 – Description of Items Hedged or Used for Income Generation or Replicated

Describe the assets or liabilities hedged, including CUSIP(s)security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the CUSIP-security identifier and a complete and accurate description of the bond; if multiple CUSIPssecurity identifiers, note that there are multiple CUSIPs-security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 1

FUTURES CONTRACTS OPEN



Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s), when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART C – SECTION 1

REPLICATION (SYNTHETIC ASSET) TRANSACTIONS (RSATs) OPEN AT CURRENT STATEMENT DATE

Include all RSATs owned as of the current statement date, including those that were open on December 31 of the previous year, and those acquired during the current year.

Column 1 – RSAT Number

Enter the RSAT Number Security ID that was filed with the NAIC’s Securities Valuation Office (SVO) pursuant to the instructions in the Purposes and Procedures Manual of the NAIC Investment Analysis Office (P&P Manual).



Column 12 – CUSIP-Security Identifier of Cash Instrument(s) Held

Enter the CUSIP-security identifier or Investment Number of the Cash Instrument(s) used in the RSAT as the instrument appears on the appropriate investment schedule.

- (a) CUSIP digits 1-6: Issuer number
- (b) CUSIP digits 7-8: Exact issue sequence
- (c) CUSIP digit 9: check digit

Column 13 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE DB – PART D – SECTION 2

**COLLATERAL FOR DERIVATIVE INSTRUMENTS OPEN
AS OF CURRENT STATEMENT DATE**



Detail Eliminated To Conserve Space

Column 3 - ~~CUSIP Identification~~Security Identifier

Enter the ~~CUSIP/PPN/CIN~~security identifier number of the asset pledged or received as collateral, when appropriate. If no ~~CUSIP/PPN/CIN~~security identifier number exists, the field should be zero-filled.

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
 (Securities lending collateral assets reported in aggregate on Line 10 of the asset page
 (Line 9 for Separate Accounts) and not included on Schedules A, B, BA, D, DB and E.)



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 11. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.~~

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

The CUSIP-security identifier reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

- Lines 0019999999 through 0509999999 Schedule D, Part 1, Section 1, Column 1
- Lines 1019999999 through 1909999999 Schedule D, Part 1, Section 2, Column 1
- Lines 4019999999 through 4509999999 Schedule D, Part 2, Section 1, Column 1
- Lines 5019999999 through 5989999999 Schedule D, Part 2, Section 2, Column 1
- Line 9409999999..... Schedule BA, Part 1, Column 1
- Line 9709999999..... Schedule E, Part 2, Column 1

The CUSIP-security identifier number should be zero-filled for the following lines:

- Real Estate (Schedule A type)9209999999
- Mortgage Loans on Real Estate (Schedule B type)9309999999

| | |
|--|------------|
| Short-Term Invested Assets (Schedule DA, Part 1 type)..... | 9509999999 |
| Cash (Schedule E, Part 1 type) | 9609999999 |
| Other Assets..... | 9809999999 |

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space

Column 10 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

| | |
|---|--|
| Lines 0019999999 through 0509999999 | Schedule D, Part 1, Section 1, Column 35 |
| Lines 1019999999 through 1909999999 | Schedule D, Part 1, Section 2, Column 37 |
| Lines 4019999999 through 4509999999 | Schedule D, Part 2, Section 1, Column 27 |
| Lines 5019999999 through 5989999999 | Schedule D, Part 2, Section 2, Column 25 |

The ISIN number should be zero filled for the following lines:

| | |
|--|------------|
| Real Estate (Schedule A type) | 9209999999 |
| Mortgage Loans on Real Estate (Schedule B type) | 9309999999 |
| Other Invested Assets (Schedule BA type)..... | 9409999999 |
| Short Term Invested Assets (Schedule DA, Part 1 type)..... | 9509999999 |
| Cash (Schedule E, Part 1 type) | 9609999999 |
| Cash Equivalents (Schedule E, Part 2 type)..... | 9709999999 |
| Other Assets..... | 9809999999 |

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
 (Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
 (Line 9 for Separate Accounts) and not reported in aggregate on Line 10 of the asset page.)



Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~ Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, or ISIN

CUSIP numbers for all purchased publicly issued securities are available from the broker’s confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: www.cusip.com/cusip/index.htm.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero filled and a valid ISIN security number should be reported in Column 11. LXID numbers (S&P Global’s LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.~~

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled “000000000”. This is a temporary security identifier of “000000000” that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled “999999999”.

The ~~CUSIP~~ security identifier reported for this column should be same for the security as reported in other schedules for the lines shown below:

- Lines 0019999999 through 0509999999 Schedule D, Part 1, Section 1, Column 1
- Lines 1019999999 through 1909999999 Schedule D, Part 1, Section 2, Column 1
- Lines 4019999999 through 4509999999 Schedule D, Part 2, Section 1, Column 1
- Lines 5019999999 through 5989999999 Schedule D, Part 2, Section 2, Column 1
- Line 9409999999..... Schedule BA, Part 1, Column 1
- Line 9709999999..... Schedule E, Part 2, Column 1

The ~~CUSIP number~~ security identifier should be zero-filled for the following lines:

- Real Estate (Schedule A)9209999999
- Mortgage Loans on Real Estate (Schedule B)9309999999

| | |
|--|------------|
| Short-Term Invested Assets (Schedule DA, Part 1) | 9509999999 |
| Cash (Schedule E, Part 1) | 9609999999 |
| Other Assets..... | 9809999999 |

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

- C - CUSIP and CINS (including syndicated loans with a CUSIP)
- P - PPN
- L - LXID
- I - ISIN (including syndicated loans with an ISIN)

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****



Detail Eliminated To Conserve Space

Column 10 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be same for the security as reported in other schedules for the lines shown below:

| | |
|---|--|
| Lines 0019999999 through 0509999999 | Schedule D, Part 1, Section 1, Column 35 |
| Lines 1019999999 through 1909999999 | Schedule D, Part 1, Section 2, Column 37 |
| Lines 4019999999 through 4509999999 | Schedule D, Part 2, Section 1, Column 27 |
| Lines 5019999999 through 5989999999 | Schedule D, Part 2, Section 2, Column 25 |

The ISIN number should be zero filled for the following lines:

| | |
|---|------------|
| Real Estate (Schedule A) | 9209999999 |
| Mortgage Loans on Real Estate (Schedule B) | 9309999999 |
| Other Invested Assets (Schedule BA)..... | 9409999999 |
| Short Term Invested Assets (Schedule DA, Part 1)..... | 9409999999 |
| Cash (Schedule E, Part 1) | 9609999999 |
| Cash Equivalents (Schedule E, Part 2)..... | 9709999999 |
| Other Assets..... | 9809999999 |

SCHEDULE E – PART 2 – CASH EQUIVALENTS

INVESTMENTS OWNED END OF CURRENT QUARTER



Detail Eliminated To Conserve Space



Column 1 - ~~CUSIP Identification~~Security Identifier

~~CUSIP identification~~A security identifier is **required and valid only** for Exempt Money Market Mutual Funds –as Identified by SVO (Line 8209999999) and All Other Money Market Mutual Funds (Line 8309999999).

DRAFTING NOTE: Update all references of CUSIP in the Annual/Quarterly Statement Instructions that refer to a security identifier and not specifically to a CUSIP number.

See below for a list of schedules/exhibits/notes with updates:

- Note 1C(2) Instruction
 - Health, Life/Fraternal, Property, and Title
 - Annual

- Note 5D(3) Instruction and Illustration
 - Health, Life/Fraternal, Property, and Title
 - Annual and Quarterly

- Note 5Q Instruction and Illustration
 - Health, Life/Fraternal, Property, and Title
 - Annual

- Interest Maintenance Reserve (IMR), Line 2
 - Life/Fraternal
 - Annual

ANNUAL STATEMENT BLANK –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

SCHEDULE BA – PART 1

Showing Other Long-Term Invested Assets OWNED December 31 of Current Year

| 1 CUSIP/Security Identifier | 2 Security ID Type | 3 Name or Description | 4 Restricted Asset Code | Location | | 6 Name of Vendor or General Partner | 7 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | 8 Date Originally Acquired | 9 Type and Strategy | 10 Actual Cost | 11 Fair Value | 12 Book/ Adjusted Carrying Value Less Encumbrances | Change in Book/Adjusted Carrying Value | | | | | 18 Investment Income | 19 Commitment for Additional Investment | 20 Percentage of Ownership |
|-----------------------------------|-----------------------|--------------------------------|-------------------------------|------------|-------------|---|---|-------------------------------------|------------------------------|----------------------|---------------------|--|--|---|--|--|--|----------------------------|---|-------------------------------------|
| | | | | 34 City | 35 State | | | | | | | | 13 Unrealized Valuation Increase/ (Decrease) | 14 Current Year's (Depreciation) or (Amortization)/ Accretion | 15 Current Year's Other-Than- Temporary Impairment Recognized | 16 Capitalized Deferred Interest and Other | 17 Total Foreign Exchange Change in B./A.C.V. | | | |

SCHEDULE BA – PART 2

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE December 31 of Current Year

| 1 CUSIP/Security Identifier | 2 Security ID Type | 3 Name or Description | Location | | 6 Name of Vendor or General Partner | 7 Date Originally Acquired | 8 Type and Strategy | 9 Actual Cost at Time of Acquisition | 10 Additional Investment Made After Acquisition | 11 Amount of Encumbrances | 12 Percentage of Ownership |
|-----------------------------------|--------------------------|--------------------------|------------|-------------|--|----------------------------------|------------------------|---|---|---------------------------------|----------------------------------|
| | | | 34 City | 35 State | | | | | | | |

SCHEDULE BA – PART 3

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Year

| 1 CUSIP/Security Identifier | 2 Security ID Type | 3 Name or Description | Location | | 6 Name of Purchaser or Nature of Disposal | 7 Date Originally Acquired | 8 Disposal Date | 9 Book/Adjusted Carrying Value Less Encumbrances, Prior Year | Change in Book/Adjusted Carrying Value | | | | | | 16 Book/Adjusted Carrying Value Less Encumbrances on Disposal | 17 Consideration | 18 Foreign Exchange Gain (Loss) on Disposal | 19 Realized Gain (Loss) on Disposal | 20 Total Gain (Loss) on Disposal | 21 Investment Income |
|-----------------------------------|-----------------------|--------------------------------|------------|-------------|---|-------------------------------------|-----------------------|---|--|---|--|--|---|--|--|---------------------|---|--|---|----------------------------|
| | | | 34 City | 35 State | | | | | 10 Unrealized Valuation Increase/ (Decrease) | 11 Current Year's (Depreciation) or (Amortization)/ Accretion | 12 Current Year's Other-Than- Temporary Impairment Recognized | 13 Capitalized Deferred Interest and Other | 14 Total Change in B./A.C.V. (9+10-11+12) | 15 Total Foreign Exchange Change in B./A.C.V. | | | | | | |

SCHEDULE D – PART 1 – SECTION 1

Showing All Long-Term **BONDS – ISSUER CREDIT OBLIGATIONS** Owned December 31 of Current Year

| 1 CUSIP/Security Identification/ Identifier | 2 Security ID Type | 3 Description | 4 Restricted Asset Code | 5 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | 6 Actual Cost | 7 Par Value | 8 Fair Value | 9 Book/ Adjusted Carrying Value | Change in Book/Adjusted Carrying Value | | | | Interest | | | | | Dates | | 20 2021 Payment Due at Maturity |
|--|-----------------------|------------------|-------------------------------|---|---------------------|----------------|--------------------|---|--|---|--|---|----------------------------|-------------------------------|--------------------|--|--|------------------------|---|--|
| | | | | | | | | | 10 Unrealized Valuation Increase/ (Decrease) | 11 Current Year's (Amortization)/ Accretion | 12 Current Year's Other- Than- Temporary Impairment Recognized | 13 Total Foreign Exchange Change in B./A.C.V. | 14 Stated Rate of | 15 Effective Rate of | 16 When Paid | 17 Interest Income Due & Accrued | 18 Interest Received During Year | 19 1819 Acquired | 20 1920 Stated Contractual Maturity Date | |

SCHEDULE D – PART 1 – SECTION 2

Showing All Long-Term **BONDS – ASSET-BACKED SECURITIES** Owned December 31 of Current Year

| 1 CUSIP/Security Identification/ Identifier | 2 Security ID Type | 3 Description | 4 Restricted Asset Code | 5 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | 6 Actual Cost | 7 Par Value | 8 Fair Value | 9 Book/ Adjusted Carrying Value | Change in Book/Adjusted Carrying Value | | | | Interest | | | | | Dates | | 20 2021 Payment Due at Maturity | 21 2022 Origination Balloon Payment % |
|--|-----------------------|------------------|-------------------------------|---|---------------------|----------------|--------------------|---|--|---|--|---|----------------------------|-------------------------------|--------------------|--|--|------------------------|---|--|---|
| | | | | | | | | | 10 Unrealized Valuation Increase/ (Decrease) | 11 Current Year's (Amortization)/ Accretion | 12 Current Year's Other- Than- Temporary Impairment Recognized | 13 Total Foreign Exchange Change in B./A.C.V. | 14 Stated Rate of | 15 Effective Rate Of | 16 When Paid | 17 Interest Income Due & Accrued | 18 Interest Received During Year | 19 1819 Acquired | 20 1920 Stated Contractual Maturity Date | | |

SCHEDULE D – PART 2 – SECTION 1

Showing All **PREFERRED STOCKS** Owned December 31 of Current Year

| 1 CUSIP/Security Identification/ Identifier | 2 Security ID Type | 3 Description | 4 Restricted Asset Code | 5 Number of Shares | 6 Par Value Per Share | 7 Book/ Adjusted Carrying Value | Fair Value | | 9 Actual Cost | Dividends | | | | Change in Book/Adjusted Carrying Value | | | | | 20 1920 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | 21 2021 Date Acquired |
|--|-----------------------|------------------|-------------------------------|-----------------------------|-----------------------------------|---|--|--------------------|---------------------|--|------------------------------|--|--------------------------------|--|---|--|--|---|--|--------------------------------|
| | | | | | | | 8 Rate per Share Used to Obtain Fair Value | 8 Fair Value | | 10 Amount Received During Year | 11 Declared But Unpaid | 12 Nonadmitted Declared But Unpaid | 13 Cumulative Undeclared | 14 Unrealized Valuation Increase/ (Decrease) | 15 Current Year's (Amortization)/ Accretion | 16 Current Year's Other-Than- Temporary Impairment Recognized | 17 Total Change in B./A.C.V. (14+15-16) | 18 Total Foreign Exchange Change in B./A.C.V. | | |

SCHEDULE D – PART 2 – SECTION 2

Showing all **COMMON STOCKS** Owned December 31 of Current Year

| 1 CUSIP Security Identification/ Identifier | 2 Security ID Type | 3 Description | 4 Restricted Asset Code | 5 Number of Shares | 6 Book/Adjusted Carrying Value | Fair Value | | 9 Actual Cost | Dividends | | | Change in Book/Adjusted Carrying Value | | | | 17 Date Acquired | 18 1718 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol |
|---|-----------------------|------------------|-------------------------------|-----------------------------|---|--|--------------------|---------------------|---------------------------------|--|---|--|---|--|--|------------------------|--|
| | | | | | | 7 Rate per Share Used to Obtain Fair Value | 8 Fair Value | | 10 Declared but Unpaid | 11 Amount Received During Year | 12 Nonadmitted Declared But Unpaid | 13 Unrealized Valuation Increase/ (Decrease) | 14 Current Year's Other-Than- Temporary Impairment Recognized | 15 Total Change in B./A.C.V. (12-13) | 16 Total Foreign Exchange Change in B./A.C.V. | | |

SCHEDULE D – PART 3

Showing all Long-Term Bonds and Stocks **ACQUIRED** During Current Year

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Description | 34 Date Acquired | 45 Name of Vendor | 56 Number of Shares of Stock | 67 Actual Cost | 78 Par Value | 89 Paid for Accrued Interest and Dividends |
|--------------------------------|-----------------------|-------------------|---------------------|----------------------|---------------------------------|-------------------|-----------------|---|
|--------------------------------|-----------------------|-------------------|---------------------|----------------------|---------------------------------|-------------------|-----------------|---|

SCHEDULE D – PART 4

Showing all Long-Term Bonds and Stocks **SOLD, REDEEMED** or Otherwise **DISPOSED OF** During Current Year

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Description | 34 Disposal Date | 45 Name of Purchaser | 56 Number of Shares of Stock | 67 Consideration | 78 Par Value | 89 Actual Cost | 910 Prior Year Book/ Adjusted Carrying Value | Change in Book/Adjusted Carrying Value | | | | | 1516 Book/ Adjusted Carrying Value at Disposal Date | 1617 Foreign Exchange Gain (Loss) on Disposal | 1718 Realized Gain (Loss) on Disposal | 1819 Total Gain (Loss) on Disposal | 1920 Bond Interest/ Stock Dividends Received During Year | 2021 Stated Contractual Maturity Date |
|--------------------------------|-----------------------|-------------------|---------------------|-------------------------|---------------------------------|---------------------|-----------------|-------------------|---|---|--|---|--|--|--|--|--|---------------------------------------|---|--|
| | | | | | | | | | | 1011 Unrealized Valuation Increase/ (Decrease) | 1112 Current Year's (Amortization)/ Accretion | 1213 Current Year's Other-Than-Temporary Impairment Recognized | 1314 Total Change in B./A.C.V. (10+11-12) | 1415 Total Foreign Exchange Change in B./A.C.V. | | | | | | |

SCHEDULE D – PART 5

Showing all Long-Term Bonds and Stocks **ACQUIRED** During Year and Fully **DISPOSED OF** During Current Year

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Description | 34 Date Acquired | 45 Name of Vendor | 56 Disposal Date | 67 Name of Purchaser | 78 Par Value (Bonds) or Number of Shares (Stock) | 89 Actual Cost | 910 Consideration | 1011 Book/ Adjusted Carrying Value at Disposal | Change in Book/Adjusted Carrying Value | | | | | 1617 Foreign Exchange Gain (Loss) on Disposal | 1718 Realized Gain (Loss) on Disposal | 1819 Total Gain (Loss) on Disposal | 1920 Interest and Dividends Received During Year | 2021 Paid for Accrued Interest and Dividends |
|--------------------------------|-----------------------|-------------------|---------------------|----------------------|---------------------|-------------------------|---|-------------------|----------------------|---|---|--|---|--|--|--|--|---------------------------------------|---|---|
| | | | | | | | | | | | 1112 Unrealized Valuation Increase/ (Decrease) | 1213 Current Year's (Amortization)/ Accretion | 1314 Current Year's Other-Than-Temporary Impairment Recognized | 1415 Total Change in B./A.C.V. (11+12-13) | 1516 Total Foreign Exchange Change in B./A.C.V. | | | | | |

SCHEDULE D – PART 6 – SECTION 1

Valuation of Shares of Subsidiary, Controlled or Affiliated Companies

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Description Name of Subsidiary, Controlled or Affiliated Company | 34 NAIC Company Code | 45 ID Number | 56 NAIC Valuation Method | 67 Book/Adjusted Carrying Value | 78 Total Amount of Goodwill Included in Book/Adjusted Carrying Value | 89 Nonadmitted Amount | Stock of Such Company Owned by Insurer on Statement Date | |
|--------------------------------|-----------------------|--|-------------------------|-----------------|-----------------------------|------------------------------------|---|--------------------------|--|--------------------------|
| | | | | | | | | | 910 Number of Shares | 1011 % of Outstanding |

SCHEDULE D – PART 6 – SECTION 2

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Name of Lower-Tier Company | 34 Name of Company Listed in Section 1 Which Controls Lower-Tier Company | 45 Total Amount of Goodwill Included in Amount Shown in Column 7, Section 1 | Stock in Lower-Tier Company Owned Indirectly by Insurer on Statement Date | |
|--------------------------------|-----------------------|----------------------------------|---|--|---|------------------------|
| | | | | | 56 Number of Shares | 67 % of Outstanding |

SCHEDULE DB – PART C – SECTION 1
Replication (Synthetic Asset) Transactions Open as of December 31 of Current Year

| Replication (Synthetic Asset) Transactions | | | | | | | | Components of the Replication (Synthetic Asset) Transactions | | | | | | |
|--|------------------|--|----------------------|-----------------------------------|-----------------|---------------------|--------------------|--|------------------------------------|------------------|---------------------------------|------------------------|-------------------|---|
| 1 Number | 2 Description | 3 NAIC Designation or Other Description | 4 Notional Amount | 5 Book/Adjusted Carrying Value | 6 Fair Value | 7 Effective Date | 8 Maturity Date | Derivative Instrument(s) Open | | | Cash Instrument(s) Held | | | |
| | | | | | | | | 9 Description | 10 Book/Adjusted Carrying Value | 11 Fair Value | 12 CUSIP Security Identifier | 13 Security ID Type | 14 Description | 15 NAIC Designation or Other Description |

SCHEDULE DB – PART D – SECTION 2
Collateral for Derivative Instruments Open December 31 of Current Year

Collateral Pledged by Reporting Entity

| 1 Exchange, Counterparty or Central Clearinghouse | 2 Type of Asset Pledged | 3 CUSIP Identification Security Identifier | 4 Security ID Type | 5 Description | 6 Fair Value | 7 Par Value | 8 Book/Adjusted Carrying Value | 9 Maturity Date | 10 Type of Margin (I, V or IV) |
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|

Collateral Pledged to Reporting Entity

| 1 Exchange, Counterparty or Central Clearinghouse | 2 Type of Asset Pledged | 3 CUSIP Identification Security Identifier | 4 Security ID Type | 5 Description | 6 Fair Value | 7 Par Value | 8 Book/Adjusted Carrying Value | 9 Maturity Date | 10 Type of Margin (I, V or IV) |
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|

**SCHEDULE DL – PART 1
SECURITIES LENDING COLLATERAL ASSETS**

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets reported in aggregate on Line 10 of the Assets page (Line 9 for Separate Accounts)
and not included on Schedules A, B, BA, D, DB and E)

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|---------------------|-------------|-----------------------------|---|------------|---------------------------------|---------------|
| CUSIP Identification Security Identifier | Security ID Type | Description | Restricted Asset Code | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | Fair Value | Book/Adjusted Carrying Value | Maturity Date |

**SCHEDULE DL – PART 2
SECURITIES LENDING COLLATERAL ASSETS**

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
and not reported in aggregate on Line 10 of the Assets page (Line 9 for Separate Accounts))

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|---------------------|-------------|-----------------------------|---|------------|---------------------------------|---------------|
| CUSIP Identification Security Identifier | Security ID Type | Description | Restricted Asset Code | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | Fair Value | Book/Adjusted Carrying Value | Maturity Date |

SCHEDULE E – PART 2 – CASH EQUIVALENTS

Show Investments Owned December 31 of Current Year

| 1 CUSIP Security Identifier | 2 Security ID Type | 23 Description | 34 Restricted Asset Code | 45 Date Acquired | 56 Rate of Interest | 67 Maturity Date | 78 Book/Adjusted Carrying Value | 89 Amount of Interest Due & Accrued | 910 Amount Received During Year |
|--------------------------------|-----------------------|-------------------|-----------------------------|---------------------|------------------------|---------------------|------------------------------------|--|------------------------------------|
|--------------------------------|-----------------------|-------------------|-----------------------------|---------------------|------------------------|---------------------|------------------------------------|--|------------------------------------|

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL & SEPARATE ACCOUNT

**ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
REPLICATIONS (SYNTHETIC) ASSETS**

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|-------------|------|---------------------------|------------------|-------------------------|--|----------------|------------------------|-----------------------|---------------------|
| RSAT Number | Type | CUSIP Security Identifier | Security ID Type | Description of Asset(s) | NAIC Designation or Other Description of Asset | Value of Asset | AVR Basic Contribution | AVR Reserve Objective | AVR Maximum Reserve |
| / | | | | | | | | | |

QUARTERLY STATEMENT BLANK – HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

SCHEDULE BA – PART 2

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE During the Current Quarter

| 1 | 2 | 23 | Location | | 56 | 67 | 78 | 89 | 910 | 1011 | 1112 | 1213 | 1314 |
|--|------------------|---------------------|----------|----------|-----------------------------------|---|--------------------------|-------------------|------------------------------------|--|------------------------|--------------------------------------|-------------------------|
| CUSIP Identification Security Identifier | Security ID Type | Name or Description | 34 City | 45 State | Name of Vendor or General Partner | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | Date Originally Acquired | Type and Strategy | Actual Cost at Time of Acquisition | Additional Investment Made After Acquisition | Amount of Encumbrances | Commitment for Additional Investment | Percentage of Ownership |

SCHEDULE BA – PART 3

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Quarter

| 1 | 2 | 23 | Location | | 56 | 67 | 78 | 89 | Change in Book/Adjusted Carrying Value | | | | | | 1516 | 1617 | 1718 | 1819 | 1920 | 2021 |
|--|------------------|---------------------|----------|-------|---|--------------------------|---------------|--|---|--|---|---|--|--|---|---------------|--|----------------------------------|-------------------------------|-------------------|
| | | | 34 | 45 | | | | | 910 | 1011 | 1112 | 1213 | 1314 | 1415 | | | | | | |
| CUSIP Identification Security Identifier | Security ID Type | Name or Description | City | State | Name of Purchaser or Nature of Disposal | Date Originally Acquired | Disposal Date | Book/Adjusted Carrying Value Less Encumbrances, Prior Year | Unrealized Valuation Increase/ (Decrease) | Current Year's (Depreciation) or (Amortization) /Accretion | Current Year's Other-Than-Temporary Impairment Recognized | Capitalized Deferred Interest and Other | Total Change in B./A.C.V. (9+10-11+12) | Total Foreign Exchange Change in B./A.C.V. | Book/ Adjusted Carrying Value Less Encumbrances on Disposal | Consideration | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Investment Income |

SCHEDULE D – PART 3

Show All Long-Term Bonds and Stocks Acquired During the Current Quarter

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|--|------------------|-------------|---------------|----------------|---------------------------|-------------|-----------|---|---|
| CUSIP Identification Security Identifier | Security ID Type | Description | Date Acquired | Name of Vendor | Number of Shares of Stock | Actual Cost | Par Value | Paid for Accrued Interest and Dividends | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol |

SCHEDULE D – PART 4

Show All Long-Term Bonds and Stocks Sold, Redeemed or Otherwise Disposed of During the Current Quarter

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change in Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 | 22 |
|--|------------------|-------------|---------------|-------------------|---------------------------|---------------|-----------|-------------|---|--|---|---|--------------------------------------|--|---|--|----------------------------------|-------------------------------|--|----------------------------------|---|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | | |
| CUSIP Identification Security Identifier | Security ID Type | Description | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/(Decrease) | Current Year's (Amortization)/Accretion | Current Year's Other-Than-Temporary Impairment Recognized | Total Change in B./A.C.V. (10+11-12) | Total Foreign Exchange Change in B./A.C.V. | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Stated Contractual Maturity Date | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol |

SCHEDULE DB – PART C – SECTION 1
Replication (Synthetic Asset) Transactions Open as of Current Statement Date

| Replication (Synthetic Asset) Transactions | | | | | | | | Components of the Replication (Synthetic Asset) Transactions | | | | | | |
|--|------------------|--|----------------------|-----------------------------------|-----------------|---------------------|--------------------|--|------------------------------------|------------------|---------------------------------|------------------------|-------------------|---|
| 1 Number | 2 Description | 3 NAIC Designation or Other Description | 4 Notional Amount | 5 Book/Adjusted Carrying Value | 6 Fair Value | 7 Effective Date | 8 Maturity Date | Derivative Instrument(s) Open | | | Cash Instrument(s) Held | | | |
| | | | | | | | | 9 Description | 10 Book/Adjusted Carrying Value | 11 Fair Value | 12 CUSIP Security Identifier | 13 Security ID Type | 14 Description | 15 NAIC Designation or Other Description |

SCHEDULE DB – PART D – SECTION 2
Collateral for Derivative Instruments Open as of Current Statement Date

Collateral Pledged by Reporting Entity

| 1 Exchange, Counterparty or Central Clearinghouse | 2 Type of Asset Pledged | 3 CUSIP Identification Security Identifier | 4 Security ID Type | 5 Description | 6 Fair Value | 7 Par Value | 8 Book/Adjusted Carrying Value | 9 Maturity Date | 10 Type of Margin (I, V or IV) |
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|

Collateral Pledged to Reporting Entity

| 1 Exchange, Counterparty or Central Clearinghouse | 2 Type of Asset Pledged | 3 CUSIP Identification Security Identifier | 4 Security ID Type | 5 Description | 6 Fair Value | 7 Par Value | 8 Book/Adjusted Carrying Value | 9 Maturity Date | 10 Type of Margin (I, V or IV) |
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|
|--|----------------------------|---|-----------------------|------------------|-----------------|----------------|-----------------------------------|--------------------|-----------------------------------|

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
 (Securities lending collateral assets reported in aggregate on Line 10 of the Assets page
 and not included on Schedules A, B, BA, D, DB and E)

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|---------------------|-------------|-----------------------------|--|------------|---------------------------------|----------------|
| CUSIP Identification Security Identifier | Security ID Type | Description | Restricted Asset Code | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | Fair Value | Book/Adjusted Carrying Value | Maturity Dates |

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
 (Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
 and not reported in aggregate on Line 10 of the Assets page)

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|---------------------|-------------|-----------------------------|--|------------|---------------------------------|----------------|
| CUSIP Identification Security Identifier | Security ID Type | Description | Restricted Asset Code | NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol | Fair Value | Book/Adjusted Carrying Value | Maturity Dates |

SCHEDULE E – PART 2 – CASH EQUIVALENTS
 Show Investments Owned End of Current Quarter

| 1 CUSIP Security Identifier | 2 Security ID Type | 3 Description | 4 Restricted Asset Code | 5 Date Acquired | 6 Stated Rate Of Interest | 7 Maturity Date | 8 Book/Adjusted Carrying Value | 9 Amount of Interest Due & Accrued | 10 Amount Received During Year |
|--------------------------------|-----------------------|------------------|----------------------------|--------------------|------------------------------|--------------------|-----------------------------------|---------------------------------------|-----------------------------------|
|--------------------------------|-----------------------|------------------|----------------------------|--------------------|------------------------------|--------------------|-----------------------------------|---------------------------------------|-----------------------------------|

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>5/13/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-16BWG</u> Year <u>2027</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input checked="" type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the list of disclosure exclusions for Notes to Financial Statement Note 20C to remove investments accounted for under the equity method. Although the annual statement instruction change will not be reflected until 2027, it is anticipated that a SAPWG memo will be provided to the Blanks (E) Working Group to inform of this disclosure change for year-end 2026. As the current fair value disclosure for financial instruments has variable lines, reporting entities can incorporate the change to the disclosure, and include equity investments previously excluded for year-end 2026.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to eliminate the disclosure exclusion for “equity method investments” from the aggregate disclosure on financial instruments captured in *SSAP No. 100 – Fair Value*. (SAPWG Ref. 2026-06)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 20 - Fair Value Measurements****Note 20C – Instruction:**

- C. A reporting entity shall disclose in the notes to the financial statements, as of each date for which a statement of financial position is presented in the quarterly or annual financial statements, the aggregate fair value or NAV for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall. This disclosure shall be summarized by the type of financial instrument for which it is practicable to estimate fair value, except for certain financial instruments identified below.

The disclosures about fair value prescribed in the paragraph above are not required for the following: (Note: These exclusions are specific to Note 20C and do not impact the reporting of fair value that may be required in other SSAPs or statutory accounting schedules.)

- Employers' and plans' obligations for pension benefits, other postretirement benefits (see scope paragraph of *SSAP No. 92—Postretirement Benefits Other Than Pensions*), postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements, as defined in *SSAP No. 12—Employee Stock Ownership Plans*, *SSAP No. 104—Share-Based Payments*, *SSAP No. 92—Postretirement Benefits Other Than Pensions* and *SSAP No. 102—Pensions*.
- Substantively extinguished debt subject to the disclosure requirements of *SSAP No. 103—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*.
- Insurance contracts, other than financial guarantees and deposit-type contracts
- Lease contracts as defined in *SSAP No. 22—Leases*.
- Warranty obligations and rights.
- ~~Investments accounted for under the equity method.~~
- Equity instruments issued by the entity.
- Deposit liabilities with no defined or contractual maturities.

**Detail Eliminated To Conserve Space**

Note 20C – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

C.

| <u>Type of Financial Instrument</u> | <u>Aggregate Fair Value</u> | <u>Admitted Assets</u> | <u>(Level 1)</u> | <u>(Level 2)</u> | <u>(Level 3)</u> | <u>Net Asset Value (NAV)</u> | <u>Not Practicable (Carrying Value)</u> |
|---|-----------------------------|------------------------|------------------|------------------|------------------|------------------------------|---|
| Issuer Credit Obligations | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| Asset-Backed Securities | | | | | | | |
| Common Stock | | | | | | | |
| Perpetual Preferred Stock | | | | | | | |
| Mortgage Loans | | | | | | | |
| <u>Joint Ventures, LLCs, & Partnerships</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> |
| <u>SSAP No. 97 Equity Investments</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Total | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

NOTE: Type of Financial Instrument Column shows examples of types of financial instruments that can be disclosed.

QUARTERLY STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE**NOTES TO FINANCIAL STATEMENTS****Note 20 - Fair Value Measurements**

- C. A reporting entity shall disclose in the notes to the financial statements, as of each date for which a statement of financial position is presented in the quarterly or annual financial statements, the aggregate fair value or NAV for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall. This disclosure shall be summarized by the type of financial instrument for which it is practicable to estimate fair value, except for certain financial instruments identified below.

The disclosures about fair value prescribed in the preceding paragraph are not required for the following. (Note: These exclusions are specific to Note 20C and do not impact the reporting of fair value that may be required in other SSAPs or statutory accounting schedules.)

- Employers' and plans' obligations for pension benefits, other postretirement benefits (see scope paragraph of *SSAP No. 92—Postretirement Benefits Other Than Pensions*), postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements, as defined in *SSAP No. 12—Employee Stock Ownership Plans*; *SSAP No. 104—Share-Based Payments*; *SSAP No. 92—Postretirement Benefits Other Than Pensions*; and *SSAP No. 102—Pensions*.
- Substantively extinguished debt subject to the disclosure requirements of *SSAP No. 103—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*.
- Insurance contracts, other than financial guarantees and deposit-type contracts
- Lease contracts as defined in *SSAP No. 22—Leases*.
- Warranty obligations and rights.
- ~~Investments accounted for under the equity method.~~
- Equity instruments issued by the entity.
- Deposit liabilities with no defined or contractual maturities.



Note 20C – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

C.

| <u>Type of Financial Instrument</u> | <u>Aggregate Fair Value</u> | <u>Admitted Assets</u> | <u>(Level 1)</u> | <u>(Level 2)</u> | <u>(Level 3)</u> | <u>Net Asset Value (NAV)</u> | <u>Not Practicable (Carrying Value)</u> |
|---|-----------------------------|------------------------|------------------|------------------|------------------|------------------------------|---|
| Issuer Credit Obligations | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| Asset-Backed Securities | | | | | | | |
| Common Stock | | | | | | | |
| Perpetual Preferred Stock | | | | | | | |
| Mortgage Loans | | | | | | | |
| <u>Joint Ventures, LLCs, & Partnerships</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> |
| <u>SSAP No. 97 Equity Investments</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> | <u>.....</u> |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Total | \$ | \$ | \$ | \$ | \$ | \$ | \$ |

NOTE: Type of Financial Instrument Column shows examples of types of financial instruments that can be disclosed.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

| | |
|--|--|
| <p style="text-align: right;">DATE: <u>5/13/2026</u></p> <p>CONTACT PERSON: _____</p> <p>TELEPHONE: _____</p> <p>EMAIL ADDRESS: _____</p> <p>ON BEHALF OF: _____</p> <p>NAME: <u>Kevin Clark</u></p> <p>TITLE: <u>Chair SAPWG</u></p> <p>AFFILIATION: <u>Iowa Insurance Division</u></p> <p>ADDRESS: _____</p> | <p style="text-align: center;">FOR NAIC USE ONLY</p> <p>Agenda Item # <u>2026-17BWG</u> Year <u>2027</u> Changes to Existing Reporting [X] New Reporting Requirement []</p> <hr/> <p style="text-align: center;">REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT</p> <p>No Impact [X] Modifies Required Disclosure []</p> <p>Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ***If Yes, complete question below***</p> <hr/> <p style="text-align: center;">DISPOSITION</p> <p>[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [] Adopted Date _____ [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____</p> |
|--|--|

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input checked="" type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input checked="" type="checkbox"/> Title |
| <input checked="" type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input checked="" type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | <input type="checkbox"/> Life (Health Supplement) |

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Annual General Interrogatory 25.04 & 25.05 to update "amount of collateral" to "assets lent". Also update Note to Financial Note 5L(1) category "Collateral held under security lending agreements" to "Assets lent under security lending agreements".

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

The purpose of this proposal is to clarify restricted asset reporting for securities lending transactions to prevent potential double-counting that could occur based on existing guidance and multiple references to "collateral". For securities lending, the security lent (which is retained on the investment schedules) shall be identified as restricted. Then, the collateral received, if the collateral is reported on balance sheet, shall be identified as restricted. (SAPWG Ref. 2026-05)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES



Detail Eliminated To Conserve Space

INVESTMENT

25. For the purposes of this interrogatory, “exclusive control” means that the company has the exclusive right to dispose of the investment at will, without the necessity of making a substitution thereof. For purposes of this interrogatory, securities in transit and awaiting collection, held by a custodian pursuant to a custody arrangement or securities issued subject to a book entry system are considered to be in actual possession of the company.

If bonds, stocks and other securities owned December 31 of the current year, over which the company has exclusive control are: (1) securities purchased for delayed settlement, or (2) loaned to others, the company should respond “NO” to 25.01 and “YES” to 26.1.

25.03 Describe the company’s securities lending program, including value for collateral and amount of loaned securities, and whether the collateral is held on- or off-balance sheet. Note 17 of Notes to Financial Statement provides a full description of the program.

25.04 Report ~~amount of collateral for~~ assets lent under security lending conforming programs as outlined in the Risk-Based Capital Instructions.

25.05 Report ~~amount of collateral~~ assets lent for other (non-conforming) programs.

ANNUAL STATEMENT INSTRUCTIONS –HEALTH & TITLE

NOTES TO FINANCIAL STATEMENTS



Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. ~~Collateral held~~ Assets lent under security lending agreements
- c. Subject to repurchase agreements



Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | 1 Total Gross (Admitted & Nonadmitted) Restricted from Current Year | 2 Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | 3 Increase/ (Decrease) (1 minus 2) | 4 Total Current Year Nonadmitted Restricted | 5 Total Current Year Admitted Restricted (1 minus 4) | 6 Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | 7 Admitted Restricted to Total Admitted Assets (b) | 8 Amount Reported in General Interrogatories | 9 Difference from Note and GI | 10 Annual GI Ref |
|---|--|--|---------------------------------------|--|---|--|---|---|----------------------------------|---------------------|
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | | | | 25.04 + 25.05 |
| c. Subject to repurchase agreements | | | | | | | | | | 26.21 |


Detail Eliminated To Conserve Space


ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. ~~Collateral held~~ Assets lent under security lending agreements
- c. Subject to repurchase agreements

**Detail Eliminated To Conserve Space****Note 5L - Illustration:**

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held Assets lent under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |

Detail Eliminated To Conserve Space

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|---|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |

Detail Eliminated To Conserve Space

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. ~~Collateral held~~ Assets lent under security lending agreements
- c. Subject to repurchase agreements

**Detail Eliminated To Conserve Space****Note 5L - Illustration:**

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held Assets lent under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |

Detail Eliminated To Conserve Space

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|--|--|---|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |

ANNUAL STATEMENT BLANK – HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES



INVESTMENT

25.01 Were all the stocks, bonds, and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 25.03) Yes No

25.02 If no, give full and complete information, relating thereto.

25.03 For securities lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 17 where this information is also provided)

25.04 For the reporting entity's securities lending program, report amount of collateral for assets lent under security lending conforming programs as outlined in the risk-based capital instructions. \$ _____

25.05 For the reporting entity's securities lending program, report amount of collateral assets lent for other (non-conforming) programs. \$ _____

QUARTERLY STATEMENT INSTRUCTIONS – HEALTH & TITLE

NOTES TO FINANCIAL STATEMENTS



Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
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- c. Subject to repurchase agreements



Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | 1 Total Gross (Admitted & Nonadmitted) Restricted from Current Year | 2 Total Gross (Admitted & Nonadmitted) Restricted from Prior Year | 3 Increase/ (Decrease) (1 minus 2) | 4 Total Current Year Nonadmitted Restricted | 5 Total Current Year Admitted Restricted (1 minus 4) | 6 Gross (Admitted & Nonadmitted) Restricted to Total Assets (a) | 7 Admitted Restricted to Total Admitted Assets (b) | 8 Amount Reported in Annual General Interrogatories | 9 Difference from Note and Annual GI | 10 Annual GI Ref |
|---|--|--|---------------------------------------|--|---|--|---|--|---|---------------------|
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | | | | 25.04 + 25.05 |
| c. Subject to repurchase agreements | | | | | | | | | | 26.21 |


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Detail Eliminated To Conserve Space
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QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

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- c. Subject to repurchase agreements

**Detail Eliminated To Conserve Space****Note 5L - Illustration:**

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|--|--|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting S/A Activity (a) | 3 Total Separate Account (S/A) Restricted Assets | 4 S/A Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held Assets lent under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |

Detail Eliminated To Conserve Space

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|---|--|--|---|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in Annual General Interrogatories | 13 Difference from Note and Annual GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |

Detail Eliminated To Conserve Space

QUARTERLY STATEMENT INSTRUCTIONS – PROPERTY**NOTES TO FINANCIAL STATEMENTS****Detail Eliminated To Conserve Space****Note 5L - Instruction:**

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

- a. Subject to contractual obligation for which liability is not shown
- b. ~~Collateral held~~ Assets lent under security lending agreements
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**Detail Eliminated To Conserve Space****Note 5L - Illustration:**

L. Restricted Assets

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This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

| Restricted Asset Category | Gross (Admitted & Nonadmitted) Restricted | | | | | | |
|---|---|---|---|---|--------------------------|-------------------------------|---|
| | Current Year | | | | | 6 Total From Prior Year | 7 Increase/ (Decrease) (5 minus 6) |
| | 1 Total General Account (G/A) | 2 G/A Supporting Protected Cell Account Activity (a) | 3 Total Protected Cell Account Restricted Assets | 4 Protected Cell Account Assets Supporting G/A Activity (b) | 5 Total (1 plus 3) | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Collateral held Assets lent under security lending agreements | | | | | | | |
| c. Subject to repurchase agreements | | | | | | | |

Detail Eliminated To Conserve Space

| Restricted Asset Category | Current Year | | | | | | |
|---|---|---|--|--|--|--|------------------------|
| | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Percentage | | 12 Amount Reported in Annual General Interrogatories | 13 Difference from Note and Annual GI | 14 Annual GI Ref |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | |
| a. Subject to contractual obligation for which liability is not shown | \$ | \$ | % | % | XXX | XXX | XXX |
| b. Collateral held Assets lent under security lending agreements | | | | | | | 25.04+25.05 |
| c. Subject to repurchase agreements | | | | | | | 26.21 |

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Blanks (E) Working Group
Editorial Revisions to the Blanks and Instructions
(presented at the May 28, 2026, Meeting)

Statement Type:

H = Health; **L/F** = Life/Fraternal Combined; **P/C** = Property/Casualty; **SA** = Separate Accounts; **T** = Title

| Effective | Table Name | Description | Statement Type | Filing Type |
|-----------|--|---|-------------------|-------------|
| 2026 | Exhibit of Nonadmitted Assets | <p>CHANGE TO INSTRUCTION</p> <p>Update the instructions to the first sentence on the Exhibit of Nonadmitted Assets to provide clarifying language on what should be included. This change came about with proposal 2025-23BWG when this exhibit is being added to the Separate Account blank and it was decided that the wording of this first sentence should be updated to clarify that the schedule should include all nonadmitted assets.</p> <p>This schedule should include the nonadmitted <u>amounts for all assets</u>(both group and individual) amounts for both invested assets and other than invested assets.</p> | H, L/F, P/C, T | Annual |
| 2026 | Notes to Financial Statements | <p>CHANGE TO INSTRUCTION</p> <p>Minor update to Note 8A(4) to add word “received” that was inadvertently missed when updating Notes to Financial Statements for SAPWG Reference 2024-23.</p> <p>(4) Identification of whether the reporting entity has derivative contracts with financing premiums. (For purposes of this term, this includes scenarios in which the premium cost is paid/<u>received</u> at the end of the derivative contract or throughout the derivative contract.)</p> | H, L/F, P/C, T | Annual |
| 2026 | Health Supplement Analysis of Operations | <p>CHANGE TO INSTRUCTION</p> <p>Update the crosscheck reference in the instructions for Column 1 to ensure the correct calculation of the crosscheck. (This was on the March 2026 editorial and the Line 6 reference in the crosscheck was not moved to the correct spot in the formula.)</p> <p>Column 1 – Total</p> <p>Column 1 (Line 19 plus Line 20) minus Column 14 (Line 19 plus Line 20) should equal Analysis of Operations by Lines of Business – Accident and Health Column 1, Line 6 plus the sum <u>Sum</u> of Lines 21 through 24 <u>minus</u> Line 6.</p> | L/F | Annual |

| Effective | Table Name | Description | Statement Type | Filing Type |
|-----------|--------------------|--|--------------------|-------------|
| 2026 | Schedule E, Part 2 | <p>CHANGE TO INSTRUCTION</p> <p>Update the line number references for the NAIC Designation Category.</p> <p>Column 11 – NAIC Designation Category</p> <p>Provide the appropriate combination of NAIC Designation Equivalent (1 through 6) and NAIC Designation Modifier Equivalent (A through G) (see table below) for each security shown.</p> <p>The NAIC Designation and NAIC Designation Modifier Equivalent should not be provided for the following lines:</p> <ul style="list-style-type: none"> • Sweep Accounts Line 8109999999 • Exempt Money Market Mutual Funds – as Identified by the SVO Line 8209999999 • All Other Money Market Mutual Funds Line 8309999999 • Qualified Cash Pools Under SSAP No. 2 Line 8409999999 • Other Cash Equivalents Lines <u>8499999999 and 8509999999</u> <p>The NAIC Designation Category will be two sub-columns in the data table.</p> <p>NAIC Designation Equivalent:</p> <p>For the NAIC Designation Equivalent, use the NAIC Designation that would have been used for the investment had it been reported on Schedule D, Part 1, Section 1 if available. If no NAIC Designation is available, the reporting entity should use a Designation Equivalent most closely resembles their credit risk the investment.</p> <p>NAIC Designation Modifier Equivalent:</p> <p>Bonds (Lines 0019999999 through 02699999990279999999)</p> | H, L/F, P/C, T, SA | Annual |

| Effective | Table Name | Description | Statement Type | Filing Type |
|----------------|-------------------------------|--|-------------------|-----------------------|
| 2026 / 2027 | Notes to Financial Statements | <p>CHANGE TO INSTRUCTION</p> <p>Update Note 5L(4) crosschecks that check back to Note 5L(1). The column reference for 5L(1) in the crosscheck should be Column 3 for Separate Account, not Column 2.</p> <p>*** k (Collateral BACV) should equal Note 5L(1) Column 1, Line o. w (Collateral BACV) should equal Note 5L(1) Column 23, Line o.</p> <p>**** k (Modco BACV) should equal Note 5L(1) Column 1, Line p. w (Modco BACV) should equal Note 5L(1) Column 23, Line p.</p> <p>***** k (FWH BACV) should equal Note 5L(1) Column 1, Line q. w (FWH BACV) should equal Note 5L(1) Column 23, Line q.</p> | L/F | Annual / Quarterly |
| 2026 / 2027 | Notes to Financial Statements | <p>CHANGE TO INSTRUCTION</p> <p>Update Note 5L(4) crosschecks that check back to Note 5L(1). The column reference for 5L(1) in the crosscheck should be Column 3 for Protected Cell, not Column 2.</p> <p>*** k (Collateral BACV) should equal Note 5L(1) Column 1, Line o. w (Collateral BACV) should equal Note 5L(1) Column 23, Line o.</p> <p>**** k (Modco BACV) should equal Note 5L(1) Column 1, Line p. w (Modco BACV) should equal Note 5L(1) Column 23, Line p.</p> <p>***** k (FWH BACV) should equal Note 5L(1) Column 1, Line q. w (FWH BACV) should equal Note 5L(1) Column 23, Line q.</p> | P/C | Annual / Quarterly |
| 2026 / 2027 | Schedule Y, Part 1A | <p>CHANGE TO INSTRUCTION</p> <p>Remove the electronic only column for Legal Entity Identifier. When the LEI columns were removed from the investment schedules (with the exception of Schedule DB), we inadvertently didn't review the remainder of the instructions to see if there were other places that were not needed.</p> <p>** Column 17 will be electronic only. **</p> <p>Column 17 ——— Legal Entity Identifier (LEI)</p> <p>Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.</p> | H, L/F, P/C, T | Annual / Quarterly |

| Effective | Table Name | Description | Statement Type | Filing Type |
|-------------|----------------------------|---|--------------------|--------------------|
| 2026 / 2027 | Schedule B, Part 1, 2, & 3 | <p>CHANGE TO INSTRUCTION</p> <p>Update the Loan Type column instructions to clarify that the column should not be left blank and codes 1 or 2 will always apply. (Part 2 and 3 column number is Column 4)</p> <p>Column 5 – Loan Type</p> <p>If the loan was made to an officer or director of the reporting entity/subsidiary/affiliate, enter “E”.</p> <p>If the loan was made directly to a subsidiary or affiliate enter “S”.</p> <p>If the loan was made directly to a related party that doesn’t meet the affiliate definition or the reporting entity has received domiciliary state approval to disclaim control/affiliation, enter “R.”</p> <p>If the residential mortgage loan is held in a qualifying statutory trust, enter “T”.</p> <p>If the mortgage loan is 100% first lien, enter “1”.</p> <p>If the mortgage loan is not a first lien, including those with a combination of first and subordinate liens, enter “2”.</p> <p>If there is more than one loan type codes, then list the appropriate code(s) separated by commas.</p> <p>Otherwise, leave the column blank. Note: Code 1 or 2 would always apply.</p> | H, L/F, P/C, T, SA | Annual / Quarterly |

| Effective | Table Name | Description | Statement Type | Filing Type |
|-------------|--------------------------------|---|--------------------|--------------------|
| 2026 / 2027 | Schedule BA, Part 1, 2, & 3 | <p>CHANGE TO INSTRUCTION</p> <p>Update the Maturity Date column instructions on Schedule BA to clarify that the field should be left blank if the investment does not have a contractual, stated maturity date. <i>(Column References: Part 1 is Column 26, Part 2 is Column 15, Part 3 is Column 24 / Quarterly References: Part 2 is Column 17, Part 3 is Column 24)</i></p> <p>Column 26 – Maturity Date</p> <p>The maturity date shall be reported for all investments on Schedule BA that have a stated maturity date. This is anticipated to include, but not limited to, all investments captured as non-bond debt securities, surplus notes, capital notes, collateral loans, non-collateral loans, and investments in tax credits. However, this list should not be considered all-inclusive for investments captured on other reporting lines with stated maturity dates. <u>If the investment does not have a contractual, stated maturity date, then leave blank.</u></p> | H, L/F, P/C, T, SA | Annual / Quarterly |
| 2027 | General Interrogatories Part 1 | <p>CHANGE TO INSTRUCTION</p> <p>Remove the LEI reference from General Interrogatory # 16.6 to be consistent with the Annual General Interrogatories that were updated for Annual 2025.</p> <p>16.6 For assets managed by an affiliated or unaffiliated firm or individual, provide for each firm or individual the Central Registration Depository Number, Legal Entity Identifier (LEI), who they are registered with and if an Investment Management Agreement has been filed for each firm or individual.</p> <p><u>Central Registration Depository Number:</u></p> <p>The Central Registration Depository (CRD) number is a number issued by the Financial Industry Regulatory Authority (FINRA) to brokers, dealers or individuals when licensed, and can be verified against their database www.finra.org. These brokers, dealers or individuals would be those contracted to manage some of the reporting entity's investments or funds and invest them for the reporting entity. The brokers, dealers or individuals can be affiliated or unaffiliated with the reporting entity. The reporting entity must list all brokers, dealers or individuals who have the authority to make investments on behalf of the reporting entity.</p> | H, L/F, P/C, T | Quarterly |

| Effective | Table Name | Description | Statement Type | Filing Type | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|---------------------------|--|---|---------------------|---|-----|-----|-----|--|-----|-----|---------------|-------------------------------------|-----|-----|-------|---|-----|-----|-------|--|-----|-----|-------|--|-----|-----|-------|----------------------------------|-----|-----|-------|--|-----|-----|-------|-----------------------|-----|-----|-------|---------------------------|-----|-----|-------|--|-----|-----|-------|--|-----|-----|-------|---|-----|-----|-------|----------------------------|-----|-----|-------|--|-----|-----|-----|--|-----|-----|-----|--|-----|-----|-----|---|-----|-----|-----|------|-----------|
| | | <p><u>Name of Firm or Individual:</u></p> <p>Should be name of firm or individual provided for 16.5</p> <p><u>Legal Entity Identifier (LEI):</u></p> <p>Provide the 20-character Legal Entity Identifier (LEI) for issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2027 | Notes to Financial Statements | <p>CHANGE TO INSTRUCTION</p> <p>Update Note 5L(1) Columns 8 and 9 to not allow entry in quarterly reporting. The general interrogatories referenced are annual interrogatories and will not tie to quarterly reporting. Also add a disclaimer that the difference/explanation table for Note 5L(1) should only be completed for annual reporting.</p> <table border="1" data-bbox="611 706 1596 1380"> <thead> <tr> <th data-bbox="611 706 1270 829">Restricted Asset Category</th> <th data-bbox="1270 706 1402 829">8 Amount Reported in Annual General Interrogatories</th> <th data-bbox="1402 706 1514 829">9 Difference from Note and Annual GI</th> <th data-bbox="1514 706 1596 829">10 Annual GI Ref</th> </tr> </thead> <tbody> <tr> <td data-bbox="611 829 1270 862">a. 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Subject to dollar repurchase agreements</td> <td data-bbox="1270 959 1402 992">XXX</td> <td data-bbox="1402 959 1514 992">XXX</td> <td data-bbox="1514 959 1596 992">26.23</td> </tr> <tr> <td data-bbox="611 992 1270 1024">f. Subject to dollar reverse repurchase agreements</td> <td data-bbox="1270 992 1402 1024">XXX</td> <td data-bbox="1402 992 1514 1024">XXX</td> <td data-bbox="1514 992 1596 1024">26.24</td> </tr> <tr> <td data-bbox="611 1024 1270 1057">g. Placed under option contracts</td> <td data-bbox="1270 1024 1402 1057">XXX</td> <td data-bbox="1402 1024 1514 1057">XXX</td> <td data-bbox="1514 1024 1596 1057">26.25</td> </tr> <tr> <td data-bbox="611 1057 1270 1089">h. Letter stock or securities restricted as to sale – excluding FHLB capital stock</td> <td data-bbox="1270 1057 1402 1089">XXX</td> <td data-bbox="1402 1057 1514 1089">XXX</td> <td data-bbox="1514 1057 1596 1089">26.26</td> </tr> <tr> <td data-bbox="611 1089 1270 1122">i. 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Pledged as collateral not captured in other categories</td> <td data-bbox="1270 1219 1402 1252">XXX</td> <td data-bbox="1402 1219 1514 1252">XXX</td> <td data-bbox="1514 1219 1596 1252">26.30</td> </tr> <tr> <td data-bbox="611 1252 1270 1284">n. Other restricted assets</td> <td data-bbox="1270 1252 1402 1284">XXX</td> <td data-bbox="1402 1252 1514 1284">XXX</td> <td data-bbox="1514 1252 1596 1284">26.32</td> </tr> <tr> <td data-bbox="611 1284 1270 1317">o. Collateral Assets Received and on Balance Sheet</td> <td data-bbox="1270 1284 1402 1317">XXX</td> <td data-bbox="1402 1284 1514 1317">XXX</td> <td data-bbox="1514 1284 1596 1317">XXX</td> </tr> <tr> <td data-bbox="611 1317 1270 1349">p. Assets held under Medco Reinsurance Agreements</td> <td data-bbox="1270 1317 1402 1349">XXX</td> <td data-bbox="1402 1317 1514 1349">XXX</td> <td data-bbox="1514 1317 1596 1349">XXX</td> </tr> <tr> <td data-bbox="611 1349 1270 1382">q. 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Subject to dollar repurchase agreements | XXX | XXX | 26.23 | f. Subject to dollar reverse repurchase agreements | XXX | XXX | 26.24 | g. Placed under option contracts | XXX | XXX | 26.25 | h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | XXX | XXX | 26.26 | i. FHLB capital stock | XXX | XXX | 26.27 | j. On deposit with states | XXX | XXX | 26.28 | k. On deposit with other regulatory bodies | XXX | XXX | 26.29 | l. Pledged as collateral to FHLB (including assets backing funding agreements) | XXX | XXX | 26.31 | m. Pledged as collateral not captured in other categories | XXX | XXX | 26.30 | n. Other restricted assets | XXX | XXX | 26.32 | o. Collateral Assets Received and on Balance Sheet | XXX | XXX | XXX | p. Assets held under Medco Reinsurance Agreements | XXX | XXX | XXX | q. Assets held under Funds Withheld Reinsurance Agreements | XXX | XXX | XXX | r. Total Restricted Assets (Sum of a through q) | XXX | XXX | XXX | H, T | Quarterly |
| Restricted Asset Category | 8 Amount Reported in Annual General Interrogatories | 9 Difference from Note and Annual GI | 10 Annual GI Ref | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a. Subject to contractual obligation for which liability is not shown | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| b. Collateral held under security lending agreements | XXX | XXX | 25.04 + 25.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| c. Subject to repurchase agreements | XXX | XXX | 26.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| d. Subject to reverse repurchase agreements | XXX | XXX | 26.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| e. Subject to dollar repurchase agreements | XXX | XXX | 26.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | XXX | XXX | 26.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| g. Placed under option contracts | XXX | XXX | 26.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | XXX | XXX | 26.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| i. FHLB capital stock | XXX | XXX | 26.27 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| j. On deposit with states | XXX | XXX | 26.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| k. On deposit with other regulatory bodies | XXX | XXX | 26.29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | XXX | XXX | 26.31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| m. Pledged as collateral not captured in other categories | XXX | XXX | 26.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| n. Other restricted assets | XXX | XXX | 26.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| o. Collateral Assets Received and on Balance Sheet | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| p. Assets held under Medco Reinsurance Agreements | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| q. Assets held under Funds Withheld Reinsurance Agreements | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| r. Total Restricted Assets (Sum of a through q) | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Effective | Table Name | Description | Statement Type | Filing Type | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Annual GI Reference | Difference between Note and Annual GI (Per Column 9 above) | Explanation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25.04+25.05 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.21 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.22 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.23 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.24 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.25 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.26 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.27 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.28 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.29 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.31 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.30 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.32 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Restricted Asset Category | Current Year | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 12 | 13 | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Restricted Asset Category | Amount Reported in Annual General Interrogatories | Difference from Note and Annual GI | Annual GI Ref | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a. Subject to contractual obligation for which liability is not shown | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| b. Collateral held under security lending agreements | XXX | XXX | 25.04+25.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| c. Subject to repurchase agreements | XXX | XXX | 26.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| d. Subject to reverse repurchase agreements | XXX | XXX | 26.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| e. Subject to dollar repurchase agreements | XXX | XXX | 26.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | XXX | XXX | 26.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| g. Placed under option contracts | XXX | XXX | 26.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | XXX | XXX | 26.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| i. FHLB capital stock | XXX | XXX | 26.27 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| j. On deposit with states | XXX | XXX | 26.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| k. On deposit with other regulatory bodies | XXX | XXX | 26.29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | XXX | XXX | 26.31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| m. Pledged as collateral not captured in other categories | XXX | XXX | 26.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| n. Other restricted assets | XXX | XXX | 26.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| o. Collateral Assets Received and on Balance Sheet | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| p. Assets held under MoDCC Reinsurance Agreements | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| q. Assets held under Funds Withheld Reinsurance Agreements | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| r. Total Restricted Assets (Sum of a through q) | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Effective | Table Name | Description | Statement Type | Filing Type | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|---------------------------|---|-------------|-------------|-----|-----|-------|-----|---|------------------------------------|---------------|---|-------|-----|-----|--|-----|-----|-------------|-------------------------------------|-----|-------|-------|---|-------|-----|-------|--|-----|-----|-------|--|-----|-------|-------|----------------------------------|-------|-----|-------|--|-----|-----|-------|-----------------------|-----|-----|-------|---------------------------|-----|-----|-------|--|-----|-----|-------|--|-----|-----|-------|---|-----|-----|-------|----------------------------|-----|-----|-------|-----|-----------|
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| Annual GI Reference | Difference between Note and Annual GI (Per Column 13 above) | Explanation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25.04+25.05 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.21 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.22 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.23 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.24 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.25 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.26 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.27 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.28 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.29 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.31 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.30 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.32 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Restricted Asset Category | Current Year | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 12 | 13 | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Amount Reported in Annual General Interrogatories | Difference from Note and Annual GI | Annual GI Ref | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a. Subject to contractual obligation for which liability is not shown | XXX | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| b. Collateral held under security lending agreements | XXX | XXX | 25.04+25.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| c. Subject to repurchase agreements | XXX | XXX | 26.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| d. Subject to reverse repurchase agreements | XXX | XXX | 26.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| e. Subject to dollar repurchase agreements | XXX | XXX | 26.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f. Subject to dollar reverse repurchase agreements | XXX | XXX | 26.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| g. Placed under option contracts | XXX | XXX | 26.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| h. Letter stock or securities restricted as to sale – excluding FHLB capital stock | XXX | XXX | 26.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| i. FHLB capital stock | XXX | XXX | 26.27 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| j. On deposit with states | XXX | XXX | 26.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| k. On deposit with other regulatory bodies | XXX | XXX | 26.29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| l. Pledged as collateral to FHLB (including assets backing funding agreements) | XXX | XXX | 26.31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| m. Pledged as collateral not captured in other categories | XXX | XXX | 26.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| n. Other restricted assets | XXX | XXX | 26.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Effective | Table Name | Description | Statement Type | Filing Type | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---------------------|---|-------------------|-------------|--|--|-----------------------------------|-----|-----|---|-----|-------|--|-----|-------|---|-----|-------|-------|--------|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|--|--|
| | | <p>***Detail Eliminated to Conserve Space***</p> <table border="1"> <thead> <tr> <th data-bbox="611 282 764 347">Annual GI Reference</th> <th data-bbox="764 282 978 347">Difference between Note and Annual GI (Per Column 13 above)</th> <th data-bbox="978 282 1167 347">Explanation</th> </tr> </thead> <tbody> <tr><td>25.04+25.05</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.21</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.22</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.23</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.24</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.25</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.26</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.27</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.28</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.29</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.31</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.30</td><td>XXX</td><td>XXX</td></tr> <tr><td>26.32</td><td>XXX</td><td>XXX</td></tr> </tbody> </table> <p><i>*Only complete difference and explanation for annual reporting.</i></p> | Annual GI Reference | Difference between Note and Annual GI (Per Column 13 above) | Explanation | 25.04+25.05 | XXX | XXX | 26.21 | XXX | XXX | 26.22 | XXX | XXX | 26.23 | XXX | XXX | 26.24 | XXX | XXX | 26.25 | XXX | XXX | 26.26 | XXX | XXX | 26.27 | XXX | XXX | 26.28 | XXX | XXX | 26.29 | XXX | XXX | 26.31 | XXX | XXX | 26.30 | XXX | XXX | 26.32 | XXX | XXX | | |
| Annual GI Reference | Difference between Note and Annual GI (Per Column 13 above) | Explanation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25.04+25.05 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.21 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.22 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.23 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.24 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.25 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.26 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.27 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.28 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.29 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.31 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.30 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26.32 | XXX | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2027 | VM-22 Reserves Supplement Part 1A | <p>CHANGE TO BLANK</p> <p>Remove all the “XXX”s from Column 1 – Prior Year. These XXX’s were originally added because the supplement was new for 2026 and there wouldn’t be prior year data. Now for Annual 2027 the prior year column should be open for entry.</p> <p style="text-align: center;">VM-22 RESERVES SUPPLEMENT – PART 1A Non-Variable Annuity Reserves Valued According to VM-22 by Product Type For The Year Ended December 31, 20__ (To Be Filed by March 1)</p> <table border="1"> <thead> <tr> <th data-bbox="665 998 1192 1157"></th> <th data-bbox="1192 998 1409 1157">Prior Year 1</th> <th data-bbox="1409 998 1617 1157">Current Year 2</th> </tr> <tr> <td></td> <td style="text-align: center;">Reported Reserve in Excess of Cash Surrender Value</td> <td style="text-align: center;">Reported Reserve in Excess of Cash Surrender Value</td> </tr> </thead> <tbody> <tr> <td>1. Post-Reinsurance-Ceded Reserve</td> <td></td> <td></td> </tr> <tr> <td> 1.1. Fixed Annuities Deferred without Guaranteed Living Benefit</td> <td style="text-align: center;">XXX</td> <td style="text-align: center;">.....</td> </tr> <tr> <td> 1.2. Indexed Annuities Deferred without Guaranteed Living Benefit.....</td> <td style="text-align: center;">XXX</td> <td style="text-align: center;">.....</td> </tr> <tr> <td> 1.3. Individual Immediate and Deferred Income Annuities and Annuitizations.....</td> <td style="text-align: center;">XXX</td> <td style="text-align: center;">.....</td> </tr> </tbody> </table> <p>DRAFTING NOTE – Remove all “XXX”s from the Prior Year column. Entire blank was not shown to conserve space.</p> | | Prior Year 1 | Current Year 2 | | Reported Reserve in Excess of Cash Surrender Value | Reported Reserve in Excess of Cash Surrender Value | 1. Post-Reinsurance-Ceded Reserve | | | 1.1. Fixed Annuities Deferred without Guaranteed Living Benefit | XXX | | 1.2. Indexed Annuities Deferred without Guaranteed Living Benefit..... | XXX | | 1.3. Individual Immediate and Deferred Income Annuities and Annuitizations..... | XXX | | L/F | Annual | | | | | | | | | | | | | | | | | | | | | | | | |
| | Prior Year 1 | Current Year 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Reported Reserve in Excess of Cash Surrender Value | Reported Reserve in Excess of Cash Surrender Value | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. Post-Reinsurance-Ceded Reserve | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.1. Fixed Annuities Deferred without Guaranteed Living Benefit | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.2. Indexed Annuities Deferred without Guaranteed Living Benefit..... | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.3. Individual Immediate and Deferred Income Annuities and Annuitizations..... | XXX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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TO: Ben Slutsker, Chair, Capital Adequacy (E) Task Force
Kevin Clark, Chair, Statutory Accounting Principles (E) Working Group
Roy Eft, Chair, Blanks (E) Working Group

FROM: Charles A. Therriault, Director, NAIC Securities Valuation Office
Marc Perlman, Managing Investment Counsel, NAIC Securities Valuation Office

CC: Carrie Mears, Chair, Invested Assets (E) Task Force
Ken Contron, Chair, Investment Designation Analysis (E) Working Group
Julie Gann Director, NAIC Solvency Policy - Financial Regulatory Affairs
Jake Stultz, Manager II, NAIC Accounting Policy - Financial Regulatory Affairs
Maggie Chang, Manager III, NAIC RBC & Solvency Policy - Financial Regulatory Affairs
Eva Yeung, Sr. RBC Analyst/Technical & Team Lead, NAIC Financial Regulatory Affairs
Mary Caswell, Sr. Manager II, NAIC Financial Regulatory Affairs
Jill Youtsey, Manager I - FDR Data Quality, NAIC Financial Regulatory Affairs

RE: Referral: Combining Security Identifiers and Adding a Security Identifier Type Field to the Annual and Quarterly Financial Statements

DATE: March 27, 2026

Summary: At the NAIC's 2025 Fall National Meeting and 2026 Spring National Meeting the Securities Valuation Office (SVO) put forward a recommendation that the annual and quarterly financial statement investment schedules be updated to combine investment security identifiers such as the Committee on Uniform Securities Identification Procedures (CUSIP), CUSIP International Numbering System (CINS), Private Placement Number (PPN) and the International Securities Identification Number (ISIN) into a single reporting field called Security Identifier paired with a Security Identifier Type field. They further recommended adding one new identifier, S&P Global's LoanX ID (LXID) (formerly IHS Marketit LoanX ID), which are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets. The objective of combining these fields is to improve investment security identification and integration with other NAIC systems, data, and reporting. The SVO has been working with the Blanks (E) Working Group support staff, American Council of Life Insurers (ACLI), Private Placement Investors Association (PPIA) and North American Securities Valuation Association (NASVA) on this proposal.

The Investment Designation Analysis (E) Working Group and Invested Assets (E) Task Force approved this referral to Blanks (E) Working Group to effect these changes and informational referrals to the Capital Adequacy (E) Task Force and Statutory Accounting Principles (E) Working Group to notify them and solicit their feedback.

Recommendation: The SVO recommends combining the current CUSIP “like” fields (e.g. CUSIP, CINS, PPN) with the electronic only ISIN field and the new LXID into a single Security Identifier field (Security ID). This would be accompanied by a new field to identify the Security ID Type. All of these identifiers are included in S&P Global’s Global Instruments Cross Reference Service (GICRS) database of global security identifiers that cross-references approximately 92 million instruments. The NAIC is in the process of integrating the GICRS data into its systems.

The Security ID Type field would be an abbreviation to denote the type of security identifier being reported: C=CUSIP and CINS (including syndicated loans with an CUSIP), I=ISIN (including syndicated loans with an ISIN), P=PPN and L=LXID. This change would permit additional security identifiers to be added in the future, as needed. The table below would be an example of the new fields. The reporting instructions for the annual and quarterly statement instructions should include the following preferred order of prioritization or usage of these security identifiers: CUSIP, CINS, ISIN, PPN and LXID.

Two special situation Security IDs are requested to accommodate common reporting issues. The first would be for securities acquired within the initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized Security ID but where one was requested. A temporary Security ID of “000000000” would be used for that initial reporting year end until the Security IDs is assigned. The temporary Security ID of “000000000” could only be used one time, in the initial reporting year end, but would need to be changed to an identifier of “999999999” in any subsequent reporting year end. The second special situation Security ID would be for securities that the insurer does not expect to receive a Security ID and an identifier of “999999999” would be used to clearly identify these securities as not having an NAIC recognized Security ID. The Security ID of “000000000” and “999999999” would not have a Security ID Type. Securities with the Security IDs of “000000000” and “999999999” would still need to follow the P&P Manual guidance to determine the NAIC Designation Category and the appropriate use of the administrative symbols.

| Security ID | Security ID Type |
|--------------|------------------|
| 123456AB7 | C |
| U12345ABX | C |
| US123456AB79 | I |
| 123456#B7 | P |
| LX118650 | L |
| 000000000 | |
| 999999999 | |

Please reach out to Charles Therriault or Marc Perlman with any questions about this referral.

SCHEDULE B – PARTS 1 AND 2

MORTGAGE LOANS OWNED AND ACQUIRED – GENERAL INSTRUCTIONS

If a reporting entity has any detail lines reported for any of the following required groups, it shall report the subtotal amount of the corresponding group with the specified subtotal line number appearing in the same manner and location as the pre-printed total. Residential mortgage loans held within qualifying statutory trust(s) are separately reported in this same manner.

For accounting guidance related to foreign currency transactions and translations, refer to *SSAP No. 23—Foreign Currency Transactions and Translations*.

Mortgages in Good Standing:

| | |
|--|------------|
| Farm Mortgages | 0199999999 |
| Residential Mortgages — Insured or Guaranteed | 0299999999 |
| Residential Mortgages — All Other | 0399999999 |
| Commercial Mortgages — Insured or Guaranteed | 0499999999 |
| Commercial Mortgages — All Other | 0599999999 |
| Mezzanine Loans | 0699999999 |
| Subtotal Mortgages in Good Standing (sum of 0199999999 through 0699999999) | 0899999999 |

Restructured Mortgages:

| | |
|--|------------|
| Farm Mortgages | 0999999999 |
| Residential Mortgages — Insured or Guaranteed | 1099999999 |
| Residential Mortgages — All Other | 1199999999 |
| Commercial Mortgages — Insured or Guaranteed | 1299999999 |
| Commercial Mortgages — All Other | 1399999999 |
| Mezzanine Loans | 1499999999 |
| Subtotal Restructured Mortgages (sum of 0999999999 through 1499999999) | 1699999999 |

Mortgages with Overdue Interest Over 90 Days, Not in the Process of Foreclosure:

| | |
|--|------------|
| Farm Mortgages | 1799999999 |
| Residential Mortgages — Insured or Guaranteed | 1899999999 |
| Residential Mortgages — All Other | 1999999999 |
| Commercial Mortgages — Insured or Guaranteed | 2099999999 |
| Commercial Mortgages — All Other | 2199999999 |
| Mezzanine Loans | 2299999999 |
| Subtotal Mortgages with Overdue Interest Over 90 Days, Not in the Process of Foreclosure (sum of 1799999999 through 2299999999) | 2499999999 |

Mortgages in the Process of Foreclosure:

| | |
|---|------------|
| Farm Mortgages | 2599999999 |
| Residential Mortgages — Insured or Guaranteed | 2699999999 |
| Residential Mortgages — All Other | 2799999999 |
| Commercial Mortgages — Insured or Guaranteed | 2899999999 |
| Commercial Mortgages — All Other | 2999999999 |
| Mezzanine Loans | 3099999999 |
| Subtotal Mortgages in the Process of Foreclosure (sum of 2599999999 through 3099999999) | 3299999999 |

Total Mortgages
 (sum of 0899999999, 1699999999, 2499999999, and 3299999999) 3399999999



SCHEDULE B – PART 3

MORTGAGE LOANS DISPOSED, TRANSFERRED OR REPAID DURING THE YEAR

Report individually each mortgage, including those held in qualifying investments in statutory trust(s), that has had decreases in the balance as a result of being closed by repayment, partial repayment, disposed or transferred to another category (e.g., real estate, Schedule A). Do not report individual partial repayments but aggregate all partial repayments by mortgage loan.

If a reporting entity has any detail lines reported for any of the following required groups, it shall report the subtotal amount of the corresponding group with the specified subtotal line number appearing in the same manner and location as the pre-printed total.

| | |
|---|------------|
| Mortgages closed by repayment | 0199999999 |
| Mortgages with partial repayments | 0299999999 |
| Mortgages disposed | 0399999999 |
| Mortgages transferred..... | 0499999999 |
| Total..... | 0599999999 |

SCHEDULE B – PART 2

MORTGAGE LOANS ACQUIRED AND ADDITIONS MADE DURING THE CURRENT QUARTER

Report individually all mortgage loans acquired or transferred from another category (e.g., joint ventures, Schedule BA) but also any increases or additions to mortgage loans acquired or transferred in the current and prior periods. Mortgages acquired and disposed during the same quarter should be reported in both Part 2 and Part 3, which would also include acquired or disposed of residential mortgage loans held within qualifying statutory trusts. Include non-conventional mortgage loans (e.g., loans that can be increased to their maximum loan value without incurring the cost of writing a new mortgage). Also include mezzanine real estate loans. For accounting and admission guidance related to mezzanine real estate loans, refer to SSAP No. 83—*Mezzanine Real Estate Loans*. Collateralized Mortgage Obligations (residential mortgage-backed securities) should be included in Schedule D.

If a reporting entity has any detail lines reported for any of the following required groups, it shall report the subtotal amount of the corresponding group with the specified subtotal line number appearing in the same manner and location as the pre-printed total.

For accounting guidance related to foreign currency transactions and translations, refer to SSAP No. 23—*Foreign Currency Transactions and Translations*.

Mortgages in Good Standing

| | |
|--|------------|
| Farm Mortgages | 0199999999 |
| Residential Mortgages—Insured or Guaranteed | 0299999999 |
| Residential Mortgages—All Other | 0399999999 |
| Commercial Mortgages—Insured or Guaranteed | 0499999999 |
| Commercial Mortgages—All Other | 0599999999 |
| Mezzanine Loans | 0699999999 |
| Subtotal Mortgages in Good Standing (sum of 0199999999 through 0699999999) | 0899999999 |

Restructured Mortgages

| | |
|--|------------|
| Farm Mortgages | 0999999999 |
| Residential Mortgages—Insured or Guaranteed | 1099999999 |
| Residential Mortgages—All Other | 1199999999 |
| Commercial Mortgages—Insured or Guaranteed | 1299999999 |
| Commercial Mortgages—All Other | 1399999999 |
| Mezzanine Loans | 1499999999 |
| Subtotal Restructured Mortgages (sum of 0999999999 through 1499999999) | 1699999999 |

Mortgages with Overdue Interest over 90 days, Not in Process of Foreclosure

| | |
|---|------------|
| Farm Mortgages | 1799999999 |
| Residential Mortgages—Insured or Guaranteed | 1899999999 |
| Residential Mortgages—All Other | 1999999999 |
| Commercial Mortgages—Insured or Guaranteed | 2099999999 |
| Commercial Mortgages—All Other | 2199999999 |
| Mezzanine Loans | 2299999999 |
| Subtotal Mortgages with Overdue Interest Over 90 Days, Not in the Process of Foreclosure (sum of 1799999999 through 2299999999) | 2499999999 |

Mortgages in the Process of Foreclosure

| | |
|--|------------|
| Farm Mortgages..... | 2599999999 |
| Residential Mortgages—Insured or Guaranteed..... | 2699999999 |
| Residential Mortgages—All Other..... | 2799999999 |
| Commercial Mortgages—Insured or Guaranteed..... | 2899999999 |
| Commercial Mortgages—All Other..... | 2999999999 |
| Mezzanine Loans..... | 3099999999 |
| Subtotal Mortgages in the Process of Foreclosure (sum of 2599999999 through 3099999999)..... | 3299999999 |
| Total Mortgages (sum of 0899999999, 1699999999, 2499999999 and 3299999999)..... | 3399999999 |



Detail Eliminated To Conserve Space



SCHEDULE B – PART 3

MORTGAGE LOANS DISPOSED, TRANSFERRED OR REPAYED DURING THE CURRENT QUARTER

Report individually each mortgage, including those held in qualifying investments in statutory trust(s), that has had decreases in the balance as a result of either being closed by repayment, partial repayment, disposed or transferred to another category, e.g., real estate, Schedule A. Do not report individual partial repayments but aggregate all partial repayments by mortgage loan. Mortgage loans acquired and sold during the same quarter should be reported in both Part 2 and Part 3.

If a reporting entity has any detail lines reported for any of the following required groups, it shall report the subtotal amount of the corresponding group with the specified subtotal line number appearing in the same manner and location as the pre-printed total.

| <u>Category</u> | <u>Line Number</u> |
|--|--------------------|
| Mortgages closed by repayment..... | 0199999999 |
| Mortgages with partial repayments..... | 0299999999 |
| Mortgages disposed..... | 0399999999 |
| Mortgages transferred..... | 0499999999 |
| Total..... | 0599999999 |

**Blanks (E) Working Group
Summary of Comments for May 28, 2026**

ITEMS RECEIVED FOR COMMENT

| Reference Number | Description |
|---|--|
| 2025-23BWG Modified | Update the Separate Account Assets page by adding “Nonadmitted Assets” and “Net Admitted General Account Assets.” Add a new line on the Separate Account Summary of Operations for “Change in Nonadmitted Assets” within the surplus account. Insert a new page “Exhibit of Nonadmitted Assets” that will detail the current and prior total nonadmitted assets, and the change in nonadmitted assets. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 1 of 6 |
| | Comment letter suggests an update to the rows on the Exhibit of Nonadmitted Assets and some other editorial items. See full comment letter for details. |
| 2025-24BWG | Update Notes to Financials Note 18B – ASC Plans for the disclosure clarifications in SSAP No. 47—Uninsured Plans. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 1 of 6 |
| | IPs have no comment. |
| 2025-25BWG | Update Notes to Financials Note # 2 – Accounting Changes and Corrections of Errors, by adding the reference to VM-20, Requirements for Principle-Based Reserves for Life Products. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 2 of 6 |
| | IPs have no comment. |
| 2025-26BWG Modified | Update the annual statement expense categories and instructions to remove outdated expense terminology and update to reflect the current types of expenses that exist for companies. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 2 of 6 |
| | IPs have no comment. |

| Reference Number | Description |
|---|---|
| 2025-27BWG Modified | Add a section to Life/Fraternal Asset Valuation Reserve (AVR) to report collateralized loan obligations (CLOs). Add a footnote to Schedule D, Part 1, Section 2 to report the book adjusted carrying value (BACV) by NAIC designation for CLOs. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 2-3 of 6 Comment letter suggests to add modify the Schedule D, Part 1, Section 2 footnote into AAA model’s tranche rating categories and to add new Investment Characteristic categories on Sch D, Part 1. The letter also had a few editorial items. See full comment letter for details. |
| 2025-29BWG | Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financials Note 5L – Restricted Assets for reporting funds withheld and modified coinsurance (modco) arrangements. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 3 of 6 IPs have no comment. |
| 2026-01BWG | Update Notes to Financials Note 26 – Intercompany Pooling Arrangements to add instructions for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 3 of 6 IPs have no comment. |
| 2026-02BWG Modified | Update Notes to Financials Note 11 – Debt to add a cross-check between Note 11B – FHLB Agreements and General Interrogatory #26. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 3 of 6 Comment letter suggests to add a clarifying instruction to Exhibit 7 to clarify that Note 11 should correspond for the General Account. Comment letter also suggests to remove a crosscheck from Note 11B(4)a. See full comment letter for details. |

| Reference Number | Description |
|---|--|
| 2026-03BWG Modified | Update the Life/Fraternal annual and quarterly blanks and instructions (Exhibit 5, General Interrogatory lines 27.6 and 27.7, Supplemental Exhibits and Schedules, Variable Annuities Supplement) to clarify how companies should report valuation standards for VM-22, Requirements for Principles-Based Reserves for Non-Variable Annuities, business. Add an annual supplement for VM-22 reserve reporting. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 4 of 6 Comment letter suggests a few editorial items and to add “XXX” to the VM-22 Reserve Supplement for prior year rows for Annual 2026 reporting. See full comment letter for details. |
| 2026-04BWG Modified | Add a section to Notes to Financials Note 11 – Debt to disclose funding agreements backing special purpose vehicles (SPV) issuances (FABN). Add a footnote to Life statement Exhibit 7 to report the amount of total funding agreements backed by SPV issuances. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 4-5 of 6 Comment letter suggests adding instructions for the new footnote (b) on Exhibit 7 and updating a few editorial items. See full comment letter for details. |
| 2026-05BWG | Update the instructions to require explicit identification of instances where NAV is used by requiring direct reporting, rather than inference through omission, in the Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code column in Schedules D and BA. The updates require completion of this column for all reported items and restrict reporting to indicators expressly permitted in the annual statement instructions. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 5 of 6 IPs have no comment. |
| 2026-06BWG | Update Notes to Financials Note 5L(1) to add a reconciling adjustment line to the illustration to identify the assets pledged under multiple arrangements. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Page 5 of 6 IPs have no comment. |

| Reference Number | Description |
|---|---|
| 2026-07BWG | Add clarifying instruction to Schedule D, Part 1, Section 1 and 2 for the payment due at maturity column and to specify what reporting categories should be included in this column. Add clarifying instructions to the origination balloon payment percentage column on Schedule D, Part 1, Section 2. For Schedule BA, Parts 1, 2, and 3 add clarification to the maturity date column to complete the column if the investment has a contractual stated maturity date. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 IPs have no comment. |
| Page 5 of 6 | |
| 2026-08BWG Modified | Add a code “O – Other” to the active status column on Schedule T for reporting entities that have a unique, restricted license type that does not fit into one of the other existing categories. Add a field to provide a description of the other license type, for example: captive insurers or international insurers. The proposal changes the “N – None of the Above” status code to “N – None,” as instances where the existing codes do not apply would now be reported through the “O – Other” status code. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 Comment letter suggests an edit to the Life/Fraternal active status code for “O” because it should have a description of “Other”, not “Qualified”. |
| Page 5 of 6 | |
| 2026-09BWG | Update the Five-Year Historical to add a line reporting short-term and cash equivalent affiliated investments. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 IPs have no comment. |
| Page 6 of 6 | |
| 2026-10BWG Modified | Update Life/Fraternal Liability lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value and an annual crosscheck to Schedule S. Add reference to use the book/adjusted carrying value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20. |
| <u>Comment #1 – Industry Interested Parties</u> | Attachment 28 IPs defer to the comments made on the SAPWG exposed Ref #2026-02, which sponsored the BWG changes. |
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| Reference Number | Description |
|---|--|
| 2026-11BWG | Update Notes to Financials Note 5A – Mortgage Loans by adding a paragraph to disclose mortgage loans acquired through a qualifying investment in a qualifying statutory trust. |
| <u>Comment #1 – Industry Interested Parties</u> IPs have no comment. | Attachment 28 Page 6 of 6 |
| 2026-12BWG | Update the AVR factors to zero in columns 7 and 9 for the Collateral Loan section. |
| <u>Comment #1 – Industry Interested Parties</u> IPs have no comment. | Attachment 28 Page 6 of 6 |

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| NAIC Blanks Working Group – Interested Parties |
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April 28, 2026

Mr. Roy Eft, Chair
Blanks (E) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000
Kansas City, MO 64106-2197

SUBJECT: Blanks Working (E) Group (“BWG”) proposals exposed, re-exposed or deferred during the conference call on Thursday, March 5, 2026, via email on Friday, March 27, 2026 and via email on Wednesday, April 22, 2026.

Dear Mr. Eft:

Interested Parties (“IPs”) appreciate the opportunity to review and comment on the 10 items that were exposed or re-exposed/deferred during the conference call held by BWG on Thursday, March 5, 2026 and the 7 proposals that were exposed via email on Friday, March 27, 2026 with a comment deadline of Tuesday, April 28, 2026. There was 1 item exposed via email on Wednesday, April 22, 2026 with a comment deadline of Wednesday, May 6, 2026.

2025-23BWG [Updates include revising the Separate Account Assets page by adding “Nonadmitted Assets” and “Net Admitted General Account Assets” columns. Add a new line on the Separate Account Summary of Operations for “Change in Nonadmitted Assets” within the surplus account. Insert a new page, “Exhibit of Nonadmitted Assets,” that details the current and prior total nonadmitted assets and the change in nonadmitted assets. This item is sponsored by SAPWG Ref #2025-25 – *Separate Account Nonadmitted Assets*. Anticipated effective date is Annual 2027.]

IPs are appreciative of incorporating our previous comments and have some additional comments.

The Separate Account Exhibit of Nonadmitted Assets page appears to be developed following the General Account Assets page but should instead follow the Separate Account Assets page rows as the Separate Account Exhibit of Nonadmitted Assets instructions disclose.

Line 22 on SOP should present “N” and “A” in nonadmitted assets as a lower case

Line 2499 on SOP the line reference should be Total (Line 23401 through 23403 plus 23498) (Line 234 above)

Line 2498 on the SOP – the line reference should be “Summary of remaining write-ins for Line 234 from the overflow page”

Separate Account Exhibit of Nonadmitted Assets Instructions

- a. In the first paragraph, does the reference to ‘(both group and individual)’ apply to both the General Account and Separate Accounts?
- b. In the second paragraph, the reference for ‘the Assets Page’ at the end of the sentence should be ‘(Page 2, Column 2, Line 16)’ which properly reflects the Asset Page in the Separate Account blank.
- c. In the second paragraph, the reference to ‘...identical to those included in the Assets Page.’ should reflect the Separate Account Assets page not the General Account Assets page as is exposed.

2025-24BWG [Updates include revising Notes to Financials, Note 18B – ASC Plans, for the disclosure clarifications in *SSAP No. 47—Uninsured Plans*. This item is sponsored by SAWPG Ref #2025-30 – *Administrative Services Contracts Disclosure Clarification*. Anticipated effective date is Annual 2026.]

IPs have no comment.

2025-25BWG [Updates include revisions to Notes to Financials, Note 2 – Accounting Changes and Corrections of Errors, by adding the reference to VM-20: Requirements for Principles Based Reserves for Life Products. This item is sponsored by SAPWG Ref #2025-34 – *Updates on Economic Scenario Generator and Non-Variable Annuities*. Anticipated effective date is Annual 2026.]

IPs have no comment.

2025-26BWG [Updates include revising the annual statement expense categories and instructions to remove outdated expense terminology and update to reflect the current types of expenses that exist for companies. This item is sponsored by SAPWG Ref #2025-33 – *Update to Annual Statement Expense Descriptions and Categories*. Anticipated effective date is Annual 2026.]

IPs are appreciative of incorporating our previous comments and have no additional comments.

2025-27BWG [Updates include adding a section to Life/Fraternal Asset Valuation Reserve (AVR) to report Collateralized Loan Obligations (CLOs). Also, add a footnote to Schedule D, Part 1, Section 2, to report the book adjusted carrying value by NAIC designation for CLOs. This item is sponsored by RBC IRE WG Ref #2025-22-IRE – *CLO Risk Factors*. Anticipated effective date is Annual 2026.]

IPs are appreciative of incorporating our previous comment and have the following additional comments.

On page 3 of the exposure, the reference in the Column 4 instructions should be ‘A17’ for Common Stock not ‘B4’ which is for Real Estate.

On page 7 of the exposure, the description of Section B, Line 4 – *Total Real Estate* should replace ‘Line 83’ with ‘Section L, Line 6’.

On page 9 of the exposure, the total for the ‘Investments in Tax Credit Structures’ section includes the total line. IPs believe the total line description should show ‘Lines H1 – H4’. Also, on page 19 for Section B – Real Estate, the total line should show ‘Sum of Lines B1 – B3’ and not include the total line.

On page 17 of the exposure in the Derivative Instruments section, add a description to line 9 (e.g., ‘Total Other Than Mortgage Loans (Sum of Lines A16+B8+C8+D8)’). Also, modify the description to Section D, line 8 to properly reflect what’s included in the line (e.g., ‘(Sum of Lines D1 through D7)’). In general, how should totals of multiple Sections be referred to? (e.g., line D9 has totals from Sections A – D). Also, should there be a correlation between the Section totals and the AVR summary page?

On page 22 of the exposure, add “L5” to the ‘Sum of Lines’ in the description for line 6 of Section L.

As the AVR is expanding the necessary pages for completion, will there be a notification that all of the following pages within the Life Annual Statement and Separate Account Annual Statement will be changing including any references to pages numbers within various schedules, exhibits, notes or general interrogatories, etc.?

To support enhanced disclosure aligned with the AAA model’s tranche rating comparable attribute of CLO/CBO/CDOs by Broadly Syndicated Loans (BSL), Middle Market Loans (MML) and all other (Other), IPs suggest modifying the Footnote under Schedule D – Part 1 – Section 2 as follows:

- Footnote 1 – Long-Term Bonds excluding CLOs/CBOs/CDOs
- Footnote 2 – CLOs/CBOs/CDOs – BSL
- Footnote 3 – CLOs/CBOs/CDOs – MML
- Footnote 4 – CLOs/CBOs/CDOs – Other

The sum of the amounts reported in Footnote 1 should equal Line 1909999999 less Lines 1099999999 and 1109999999 on Schedule D – Part 1 – Section 2. The sum of the amounts reported in Footnotes 2, 3 and 4 should equal Lines 1099999999 and 1109999999 on Schedule D – Part 1 – Section 2.

The sum of the amounts reported in Footnotes 1, 2, 3 and 4 should equal the total of Section A of the Asset Valuation Reserve page.

To assist industry in getting this data, IPs suggest adding new codes to the electronic-only column for “Investment Characteristics” on Schedule D – Part 1 to identify the various types of CLOs/CBOs/CDOs:

- 8. Investment is a Broadly Syndicated Loan (BSL) under the CLOs/CBOs/CDOs subcategory of ABS
- 9. Investment is a Middle Market Loan (MML) under the CLOs/CBOs/CDOs subcategory of ABS
- 10. Investment is all other than BSL and MML under the CLOs/CBOs/CDOs subcategory of ABS

2025-29BVG [Updates include revising the Investment Schedules General Instructions for the Restricted Asset Code column to add codes that were previously added to Notes to Financials, Note 5L – Restricted Assets, for reporting funds withheld and Modco arrangements. This item is sponsored by SAPWG Ref #2025-27 – *SSAP No. 1 Modco & FWH Code*. Anticipated effective date is Annual 2026 / 1st Quarter 2027.]

IPs have no comment at this time and await the resolution of the sponsoring SAPWG item.

2025-30BVG [Updates include revising Notes to Financials, Note 12 – Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans, to clarify reporting retirement plan assets at net asset value (NAV). This item is sponsored by SAPWG Ref #2025-21 – *Retirement Plan Assets Held at NAV*. Anticipated effective date is Annual 2026 / 1st Quarter 2027.]

IPs are appreciative of incorporating our previous comments and have no additional comments.

2026-01BVG [Updates include modifying Notes to Financials Note 26 – *Intercompany Pooling Arrangements* to add instructions for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value. This item is sponsored by SAPWG Ref #2022-12 – *Review of INT 03-02: Modification to an Existing Intercompany Pooling Arrangement*. Anticipated effective date is Annual 2026.]

IPs have no comment.

2026-02BVG [Updates include modifying Notes to Financials Note 11 – Debt to add a crosscheck between Note 11B – FHLB Agreements and General Interrogatory #26 for FHLB Capital Stock and Collateral Pledged to FHLB. It also includes a crosscheck between Note 11B – FHLB Agreements and Exhibit 7, footnote (a) for Borrowing from FHLB. Anticipated effective date is Annual 2026.]

IPs recommend that instructions be added to Exhibit 7 for footnote (a) to clarify that Note 11B(4)a1(b) (Column 4) should be updated for a corresponding amount for the General Account.

IPs would like to clarify that the phrase “For funding agreements, report the total reserves established” in the instructions for Note 11B(4)a that reserves shall be reported before reinsurance and calculated in accordance with SSAP No. 52 – *Deposit-Type Contracts*. In conjunction with this change, IPs recommend that the following footnote be removed from Note 11B(4)a: “* 11B(4)a1(b) (Column 2) should be equal to Exhibit 7 Footnote (a), Line 6”.

2026-03BWG [Updates include modifying the Life/Fraternal Annual and Quarterly Blanks and Instructions (Exhibit 5, General Interrogatory lines 27.6 and 27.7, Supplemental Exhibits and Schedules, Variable Annuities Supplement) to clarify how companies should report valuation standards for VM-22 business and add an annual supplement for VM-22 Reserves reporting. This item is sponsored by the Life Actuarial (A) Task Force. Anticipated effective date is Annual 2026 / 1st Quarter 2027.]

IPs recommend including the following sentence at the beginning of the VM-22 RESERVES SUPPLEMENT instructions to clarify when it is to be filed: This supplement is to be filed on or before April 1.

The Separate Accounts statement contains Exhibit 3, which is the same as the Life/Fraternal Exhibit 5. The cover page does not indicate the inclusion of Separate Accounts. IPs suggest that the “Separate Accounts” box be checked.

In addition, the cover page and the proposal itself indicate revisions to Exhibit 5 for the Life/Fraternal statement only. However, some companies filing the Health blank are required to file the Life Supplement which includes Exhibit 5. IPs suggest that the “Health (Life Supplement)” box be checked.

For VM-22 Reserves Supplement – Part 1A, IPs recommend for the 2026 filing year that the Prior Year column doesn’t need to be completed as indicated by the following in the instructions for this part: Only business issued on or after Jan. 1, 2026, valued by the requirements of VM-22 should be reported in Part 1A. Please consider adding “XXX” to all rows for the Prior Year column for 2026.

2026-04BWG [Updates include adding a section to Notes to Financials Note 11 – Debt to disclose funding agreements backing special purpose vehicles (SPV) issuances (FABN) and a footnote to Life statement Exhibit 7 – Deposit-Type Contracts to report the amount of total funding agreements backed by SPV issuances. This item is sponsored by the Macroprudential Working Group. Anticipated effective date is Annual 2026.]

IPs suggest the following edits to this exposure:

- Check the ‘Health (Life Supplement)’ box as that is where Exhibit 7 is located.
- Change the description of Note 11 from ‘Debt’ to ‘Debt, FHLB Agreements, Unused commitments and lines of credit for financing arrangements, Funding Agreements - SPV Issuances’ as that better reflects what is being disclosed in Note 11.
- In the Instructions for Note 11D(1), replace the verbiage as follows for consistency with our comments on the related SAPWG exposure:
 - For each type of issuance, report the total balance of funding agreements, the balance where the transaction contains a put feature or embedded option¹, the balance where the terms of the SPV Issuance differ from the terms of the corresponding funding agreement², and the book adjusted carrying value (BACV) amount of invested assets collateral (i.e., not including the funding agreements) pledged by the reporting entity by type of transaction:
- In the Illustration for Note 11D(1), remove the the following crosscheck ‘Life Filers - 11D(1)g Column 1 should equal Exhibit 7 Footnote (b) Line 1’ as the amounts would not always be equal.
- In footnote 2 at the bottom of page 2, insert ‘associated’ before ‘SPV issuances’.
- For the reference to ‘Note 11B – Illustration’, the Note number should be 11D.
- In the illustration for Note 11D(1), ‘agreement’ should be capitalized to be consistent with the other words.
- For the illustration in Note 11D(1), place ‘XXX’ in rows a., b. and e. under column 4 as these wouldn’t have collateral associated with them.
- For the instructions for Note 11D(3), the word “issues” should be “issued”.
- For the illustration in Note 11D(3), the first line should be “1 Year **or** Less”.
- For the illustration in Note 11D(4), the description for row a. should have an ending parenthesis.
- In Note 11D(4)a, consider a change to the description to “Amount of FA Backing SPV Issuances in USD” with line 11D(4)b.
- For the illustration header for Note 11D(4), please consider capitalizing ‘currency denominations’ for consistency with other headers.

- In Note 11D(4)b, the total amount on Line 7 should not include ‘+7’ in the parenthesis.
- For footnote (b) in Exhibit 7, consider incorporating the following instructions:
 - Note 7(b) - Funding agreements that back special purpose vehicle (SPV) issuances
Report funding agreements issued by the reporting entity that support funding agreement-backed special purpose vehicle (SPV) issuances. (This is required for all known instances, even in situations in which the SPV was not sponsored or formed by the reporting entity and when the relevant SPV is bankruptcy remote from the reporting entity.) The balance of funding agreements supporting funding agreement-backed SPV issuances shall be reported before reinsurance and shall be calculated in accordance with SSAP No. 52 – *Deposit-Type Contracts*.
- For footnote (b)1 in Exhibit 7, consider modifying the description for clarity as follows: “Total across all categories (captured in column 1, line 9)”
- For footnote (b)2 in Exhibit 7, consider modifying the description for clarity as follows: “Of the total in line (b) 1, funding agreements...”

2026-05BVG [Updates include modifying the instructions to require explicit identification of instances where NAV is used by requiring direct reporting, rather than inference through omission, in the Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code column in Schedules D and BA. The updates will also require completion of this column for all reported items and restrict reporting to indicators expressly permitted in the Annual Statement Instructions. Anticipated effective date is Annual 2026.]

IPs have no comment.

2026-06BVG [Updates include modifying Note 5L(1) of the Notes to Financial Statements to add a reconciling adjustment line to the illustration to identify the assets pledged under multiple arrangements. Anticipated effective date is Annual 2026 / 1st Quarter 2027.]

IPs have no comment.

2026-07BVG [Updates include modifying Schedule D, Part 1, Section 1 and 2 to add clarification to the instructions for the *Payment Due at Maturity* column specifying which reporting subcategories should be in scope for this column and add clarifying instructions to the *Origination Balloon Payment %* column. For Schedule BA, Parts 1, 2, and 3, add clarification to the *Maturity Date* column to complete the column if the investment has a contractual stated maturity date. This item is sponsored by SAPWG Ref #2025-29 – *Reporting Clarifications*. Anticipated effective date is Annual 2026 / 1st Quarter 2027.]

IPs have no comment.

2026-08BVG [Updates include modifying the list of active status codes on Schedule T to include an “O - Other” category for reporting entities that have a unique, restricted license type that does not fit into one of the other existing categories. This category would be used by captive insurers, international insurers, or other types of insurers that have received an insurance authorization from a U.S. jurisdiction, but do not qualify as fully admitted carriers and do not fit into one of the other categories. The proposal also edits the “N – None of the Above” status code to change it to “N – None,” as instances where the existing codes do not apply would now be reported through the “O – Other” status code and adds a field to Schedule T for the reporting entity to provide a description of the “O – Other” license type being reported. Anticipated effective date is Annual 2026.]

IPs have the following editorial suggestion:

- On the page for Annual Statement Instructions – Life / Fraternal, the Active Status code for “O” should have a description of “Other”, not “Qualified”.

2026-09BWG [Updates include modifying the Five-Year Historical Data page to add a line reporting short-term and cash equivalent affiliated investments. This item is associated with 2024-02BWG, which removed categories from Schedule DA, Part 1, and Schedule E, Part 2, that should be reported on Schedule BA. Anticipated effective date is Annual 2026.]

IPs have no comment.

2026-10BWG [Updates include modifying the Life/Fraternal Liability Lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value and an annual crosscheck to Schedule S. Also, add reference to use the book/adjusted carrying value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20. This item is sponsored by SAPWG Ref #2026-02 – *SSAP No. 61 (Valuation of Funds Withheld Liability)*. Anticipated effective date is Annual 2026.]

As the SAPWG comments are due after the BWG comments for this item, IPs defer to the comments made on the SAPWG exposed item Ref #2026-02, which sponsored the BWG changes. If additional insights are warranted, then IPs request a brief meeting with NAIC Staff to address the outstanding issues.

2026-11BWG [Updates include modifying Note 5A – Mortgage Loans in the Notes to Financial Statements by adding a paragraph to disclose mortgage loans acquired through a qualifying investment in a qualifying statutory trust. This item is sponsored by SAPWG Ref #2025-13 – *Residential Mortgage Loans Held in Statutory Trusts*. Anticipated effective date is Annual 2026.]

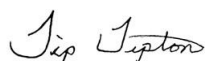
IPs have no comment.

2026-12BWG [Updates include revising the Asset Valuation Reserve (AVR) factors to zero in columns 7 and 9 for the Collateral Loans section of the AVR Equity and Other Invested Asset Component page. Anticipated effective date is Annual 2026.]

IPs have no comment.

* * * *

Thank you for the opportunity to comment on the above items. Please feel free to contact me if you have any questions or would like to discuss them further.



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