NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Draft date: 7/23/25

Virtual Meeting

BLANKS (E) WORKING GROUP
Wednesday, August 6, 2025
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/Amal Mechaiel	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
		Mary Jo Lewis	West Virginia
Daniel Mathis	Iowa	Adrian Jaramillo/ Michael Erdman	Wisconsin
Jason Tippett	Michigan		
Danielle Smith/Kelly Hopper	Missouri		

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

AGENDA

1. Consider Adoption of its May 29 Minutes—*Roy Eft (IN)* — Attachment 1

2. Consider Adoption of Previously Exposed Items—*Roy Eft (IN)*
   A. 2025-16BWG – Update Health Annual Statement Instructions for the Prescribed Language for Statement of Actuarial Opinion, Section 4 (Identification Section) for consistency in reporting. Also update the Statement of Actuarial Opinion, Section 7 (Opinion Section), Item C, to be consistent with the Life Annual Statement Instructions and VM-30. — Attachment 2

3. Consider Adoption of its Editorial Listing—*Roy Eft (IN)* — Attachment 3

4. Discuss Any Other Matters Before the Working Group—*Roy Eft (IN)*

5. Adjournment

The following documents are being provided as reference materials:
Summary of Comment Letters — Attachment 4
Comment Letters — Attachment 5

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Draft: 6/11/25

Blanks (E) Working Group
Virtual Meeting
May 29, 2025

The Blanks (E) Working Group of the Accounting Practices and Procedures (E) Task Force met May 29, 2025. The following Working Group members participated: Roy Eft, Chair (IN); Steve Drutz, Vice Chair (WA); David Phifer (AK); Kim Hudson (CA); Wayne Shepherd (CT); N. Kevin Brown (DC); Tom Hudson (DE); Carolina Herrera Wagoner and Shalice Rivers (FL); Daniel Mathis (IA); Jason Tippett (MI); Kelly Hopper and Danielle Smith (MO); Tadd Wegner (NE); Paul Lupo (NJ); Dale Bruggeman and Tracy Snow (OH); Ryan Rowe (OK); Shawn Frederick and Matthew Richard (TX); Jake Garn (UT); Michael Erdman and Adrian Jaramillo (WI); and Mary Jo Lewis (WV).

1. Adopted its March 6 Minutes

Eft stated that during its March 6 meeting, the Working Group adopted nine proposals, including: 1) updating the annual investment schedules for the bond project editorial items; 2) updating the line category for "Bonds Issued by Funds Representing Operating Entities"; 3) removing the Affordable Care Act (ACA) disclosure on the transitional reinsurance program and the risk corridors program from the Supplemental Health Care Exhibit (SHCE); 4) removing the quarterly investment interrogatory line 13 for reporting mortgages and real estate in short-term investments; 5) adding a pet insurance line to the Market Conduct Annual Statement (MCAS) premium exhibit; 6) adding a footnote to SHCE, Part 2, to report the amount of premium deficiency reserves included in the lines of Part 2; 7) adding an electronic-only assessment company contact to the annual and quarterly jurat page; 8) clarifying instructions for Schedule D, Parts 4 and 5; and 9) adding clarification to the Schedule BA definitions for surplus debentures and capital notes.

The Working Group re-exposed 2024-19BWG which is up for adoption at this meeting; exposed six new proposals and received two Statutory Accounting Principles (E) Working Group memorandums addressing inactive Lloyd's syndicates and the year-end 2024 Impacts to the Annual Statement Notes and Instructions. The Working Group adopted its editorial listing.

Drutz made a motion, seconded by Hudson, to adopt the Working Group's March 6 (*see NAIC Proceedings – Spring 2025, Accounting Practices and Procedures (E) Task Force, Attachment Two*) minutes. The motion passed unanimously.

2. Adopted Items Previously Exposed

A. Agenda Item 2024-19BWG

Eft stated that this proposal updates Schedule BA line categories and instructions for the expansion of collateral loans. It adds two electronic-only columns on Schedule BA, Part 1, for reporting fair value of collateral backing and the percentage of the collateral. It updates the asset valuation reserve (AVR) instructions and blank for the added collateral loan lines.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group collateral loan revisions in agenda item 2023-28. The revisions reflected in the proposal result in granular reporting of collateral loans on Schedule BA based on the type of collateral that is backing the loan. The revisions would be effective Jan. 1, 2026. Comments were received from interested parties from the recent exposure, and minor edits were reflected for editorial comments.

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A specific industry comment requested a continuation of the interim risk-based capital (RBC) treatment for collateral loans backed by mortgages, consistent with that noted in the Statutory Accounting Principle (E) Working Group adoption. The adoption/effective date of the collateral loan reporting lines in Schedule BA and AVR will reflect a permanent solution; therefore, all collateral loans backed by mortgage loans shall be captured on these reporting lines. This means that reporting entities shall no longer follow the June 2024 interim provision that permitted collateral loans backed by mortgage loans to flow through AVR in lines 38–64 as an "Equity and Other Invested Asset Component." With an effective date of Jan. 1, 2026, it is anticipated that the updated RBC will be in place for year-end. If this is not adopted at Capital Adequacy (E) Task Force for the RBC filing in time for the year-end 2026 application (June 30, 2026), the industry can request a re-establishment of the interim AVR reporting/RBC accommodation to the Statutory Accounting Principle (E) Working Group at that time. With the adoption of this proposal, all collateral loans shall be reported on the applicable collateral loan reporting line on Schedule BA.

Another industry comment was about non-collateral-backed party loans. The proposal was previously modified to include a related party line and an affiliate line, along with an all-other line, to accommodate a prior industry comment. Only affiliated loans shall be included in the affiliated line. Non-collateral-backed loans that do not qualify as affiliates shall not be included in the affiliated subtotal line. These lines were added as related party loans are subject to specific guidance in *Statement of Statutory Accounting Principles (SSAP) No. 25—Affiliates and Other Related Parties* and should be identifiable for regulator review.

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

B. Agenda Item 2025-01BWG

Eft stated that this proposal updates the Note to Financial Statements Note 8—Derivatives to include adopted revisions to *SSAP No. 86—Derivatives*. It updates Note 11—Debt for the adopted revisions to *SSAP No. 15—Debt and Holding Company Obligations*.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2023-26. The revisions capture a new disclosure related to cash flows for derivative instruments and a disclosure adopted from U.S. generally accepted accounting principles (GAAP) for unused commitments for year-end 2025.

In response to the industry comments, NAIC staff have worked with industry representatives to clarify the guidance instructions. These clarifications assist in classifying short-term or long-term commitments and clarify the inclusion of undrawn Federal Home Loan Bank (FHLB) commitments and lines of credit. This proposal is effective year-end 2025.

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

C. Agenda Item 2025-02BWG

Eft stated that this proposal updates Note to Financial Statements Note 9—Income Taxes to include adopted revisions to *SSAP No. 101—Income Taxes*.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-11. The revisions delete a prior disclosure for the cumulative amount of each temporary tax difference. There were no industry comments on this proposal being effective year-end 2025.

Bruggeman made a motion, seconded by Drutz, to adopt the proposal (Attachment Two-C). The motion passed unanimously.

D. Agenda Item 2025-03BWG

Eft stated that this proposal modifies the Life Insurance (State Page) to include accident and health data for direct premium earned and direct losses incurred. Jamie Walker (TX) and NAIC staff had previously discussed interested party concerns and addressed those in the modifications.

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

E. Agenda Item 2025-04BWG

Eft stated that this proposal adds a new part to the Note to Financial Statements Note 28—Health Care Receivables to include Medicare Part D prescription payment plans.

Bruggeman stated that this proposal is in response to the Statutory Accounting Principles (E) Working Group revisions in agenda item 2025-08: Medicare Part D Prescription Payment Plan Disclosures adopted on May 22. Two modifications were added to the proposal. One removed the word "of" in 28C(1), and after reviewing comments, the Statutory Accounting Principles (E) Working Group recommended removing a prior year column in the same note. This proposal is effective year-end 2025.

Bruggeman made a motion, seconded by Drutz, to adopt modifications to the proposal. The motion passed unanimously. Bruggeman made a motion, seconded by Drutz, to adopt the modified proposal (Attachment Two-E). The motion passed unanimously.

F. Agenda Item 2025-05BWG

Eft stated that this proposal adds a new part to Schedule S to report reinsurance agreements with funds withholding and modified coinsurance (modco).

Bruggeman stated that this proposal is in response to the Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-07, which added a new Schedule S, Part 8, to the Life/Fraternal Annual Statement adopted on May 22. NAIC staff made minor revisions that were suggested by interested parties. As a result of the comments received from the prior exposure, language was added to help in situations when an assuming company has not received the necessary information in a timely manner to report the assets, and this added guidance follows the methodology that is included in the RBC instructions. Additionally, the scope of the schedule was updated based on comments received from both industry and state insurance regulators. The original scope was to be any assets subject to a funds withheld or modco arrangement, but for the final adoption, the scope was narrowed to only include those assets that transfer investment risk, which more closely aligns with the reporting for RBC. This proposal is effective as of year-end 2025.

Bruggeman made a motion, seconded by Hudson, to adopt modifications to the proposal. The motion passed unanimously.

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Tip Tipton (Thrivent Financial) stated that he has received interested party inquiries regarding a sentence that was added to the Statutory Accounting Principles (E) Working Group agenda item 2024-07, which sponsored changes to 2025-05BWG creating Schedule S—Part 8 for "Reinsurance Agreements with Funds Withheld and Modified Coinsurance." The sentence added was, "Only the portion of the assets used to support the ceded or assumed liabilities should be included, i.e., amounts in excess of the reserve should be excluded." Interested parties are inquiring to see if this is a clarification of the existing RBC process or a new concept. If it is a clarification, interested parties are unable to identify this within the RBC instructions. Jake Stultz (NAIC) indicated that this is a clarification and that it is not intended to introduce a new concept. He indicated that a memorandum can be drafted from the Statutory Accounting Principles (E) Working Group to the Blanks (E) Working Group to explain this reporting clarification and post it to the NAIC website.

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

G. Agenda Item 2025-06BWG

Eft stated that this proposal updates Note 5L—Restricted Assets Instructions and Illustrations to make the changes for clarification on what should be reflected within the restricted asset note.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-20. The revisions specify how modco and funds withheld assets shall be captured as restricted assets. Additionally, the Statutory Accounting Principles (E) Working Group supported additional revisions to improve the restricted asset disclosure for year-end 2025, which included aggregating all restricted assets in a single table and identifying differences from items reported as restricted between Note 5L and the general interrogatories. The industry comments were limited to including instructions and editorial revisions, and these items have been reflected. This proposal is effective year-end 2025.

Bruggeman made a motion, seconded by Phifer, 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-G). The motion passed unanimously.

H. Agenda Item 2025-07BWG

Eft stated that this proposal updates Schedule P with editorial revisions exposed by the Casualty Actuarial and Statistical (C) Task Force.

Citarella stated that changes are proposed on the Schedule P instructions, including: 1) add numbering to paragraphs to aid communication when referring to the instructions, as was done in Part 7; 2) continue to use the word "prior" to describe the row of 10+ accident years; 3) change to use the word "previous" when referring to "one or more years ago"; and 4) use the terminology of "prior row" and only use "line" when referring to line of business. Additional changes are to eliminate any instructions that apply to business prior to 2000 and use the abbreviation of the loss adjustment expenses (Defense and Cost Containment [DCC] and Adjusting and Other [A&O]) instead of spelling out each time. He stated that while the tables are generally referred to as "accident year" triangles, the tables are labeled as "incurred year" because the trigger for coverage is not always the accident year. Therefore, "accident year" is changed to "incurred year" throughout the document to avoid confusion. He stated that a couple of paragraphs were moved to the first page of the instructions for better flow. Pooling paragraphs were moved to the overall instruction page as well as the line of business information, and not only in Part 1. The proposal eliminates references to Exhibit B, which was deleted when all lines of business

began to report 10 years of data (versus two years of data for some lines) and created more "The Prior Row" sections. No interested party comments were received.

Drutz made a motion, seconded by Phifer, to adopt the proposal (Attachment Two-H). The motion passed unanimously.

I. Agenda Item 2025-08BWG

Eft stated that this proposal removes Life/Fraternal General Interrogatory #14, which reports total dividends paid to stockholders, and renumbers the remaining general interrogatory.

Bruggeman stated that this proposal is in response to revisions in agenda item 2025-07 adopted by the Statutory Accounting Principles (E) Working Group on May 22. The revisions delete a general interrogatory from the life/fraternal blank on dividends received. This proposal is effective as of year-end 2025.

Bruggman made a motion, seconded by Drutz, to adopt the proposal (Attachment Two-I). The motion passed unanimously.

J. Agenda Item 2025-09BWG

Eft stated that this proposal updates Life/Fraternal Note to Financial #35 for separate account transfers. It adds a general interrogatory to the separate account blank for transfers and repurchase agreements, as well as reverse repurchase transactions.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-10. The revisions include new disclosures for separate account products where the general account provides an inherent or ultimate guarantee, with identification of whether risk charges have been provided to the general account and affirmation of the separate account products in the asset adequacy testing (AAT). The adopted disclosures also incorporate disclosures on repurchase and reverse/repurchase activity in the separate account, as well as a discussion of asset transfers that did not reflect sales for cash between the general account and the separate account. The disclosures are effective year-end 2025.

Bruggman made a motion, seconded by Drutz, to adopt the proposal (Attachment Two-J). The motion passed unanimously.

K. Agenda Item 2025-10BWG

Eft stated that this proposal updates Note 5L to identify assets held under funds withholding agreements (including modco) that are affiliated with the reinsurer. It updated the list of required quarterly disclosures to include Note 5L—Restricted Assets. With this change, this disclosure will be required in all interim and annual financial statements.

Bruggeman stated that this proposal is in response to the adopted revisions in agenda item 2025-05 by the Statutory Accounting Principles (E) Working Group on May 22. The revisions are in response to a Financial Analysis (E) Working Group referral to capture information on funds withheld assets that are related to/affiliated with the reinsurer.

The Statutory Accounting Principles (E) Working Group considered comments from the industry during its May 22 meeting and did not incorporate any changes prior to adopting the exposed statutory accounting guidance. With the adopted guidance, the entire restricted asset note will be required in all quarterly and annual financial statements, and a new disclosure will identify funds withheld assets that are related to/affiliated with the

reinsurer. For clarity, the disclosure will be effective for year-end 2025, and quarterly reporting will begin in the first quarter of 2026.

The industry comments were to clarify the quarterly requirement for the new reinsurer affiliated assets disclosure and ensure consistency between the quarterly and annual note presentation.

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

L. Agenda Item 2025-11BWG

Eft stated that this proposal removes the capital structure code reporting column on Schedule D, Part 1, Sections 1 and 2.

Bruggeman stated that this proposal is in response to the adopted revisions in agenda item 2025-04 by the Statutory Accounting Principles (E) Working Group on May 22. The revisions delete the capital structure code from Schedule D-1-1: Long-Term Bonds—Issuer Credit Obligations and Schedule D-1-2: Asset-Backed Securities to be effective year-end 2025. No industry comments were received.

Bruggman made a motion, seconded by Drutz, to adopt the proposal (Attachment Two-L). The motion passed unanimously.

M. Agenda Item 2025-12BWG

Eft stated that this proposal removes Line 8—Unrated Multi-Class Securities Acquired by Conversion from AVR: Default Component—Basic Contribution. It relabels the line with "intentionally left blank" to prevent renumbering all lines in the AVR schedule and to be used in the future if there are other AVR updates.

Bruggeman stated that this proposal is in response to the adopted revisions in agenda item 2025-06 by the Statutory Accounting Principles (E) Working Group on May 22. The revisions delete reporting line 8, "Unrated Multi-Class Securities Acquired by Conversion," from the AVR. Under the proposal, the line will be renamed to "intentionally left blank" to prevent renumbering AVR/RBC references.

Although industry comments suggested combining this item with the collateral loan proposal, that would delay the effective date until 2026. As there are no items that should be reported on this line, it is recommended that it be removed to prevent inappropriate reporting. The AVR line, renamed "intentionally left blank," can be removed permanently as part of the collateral loan (or any subsequent) AVR revision.

Bruggman made a motion, seconded by Phifer, to adopt the proposal (Attachment Two-M). The motion passed unanimously.

N. Agenda Item 2025-13BWG

Eft stated that this proposal updates the Notes to Financial Statements Note 13K with disclosure updates to *SSAP No. 41—Surplus Notes.*

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-28. The revisions consolidate or eliminate disclosures to be consistent with the adopted disclosures in SSAP No. 41 to be effective year-end 2025. A minor edit was made to the proposal form to clarify that the revisions do not apply to separate accounts.

Bruggman made a motion, seconded by Phifer, to adopt the proposal with the minor editorial changes (Attachment Two-N). The motion passed unanimously.

O. Agenda Item 2025-14BWG

Eft stated that this proposal adds instructions to include Medicare Part D Prescription Payment Plan information to the Health Care and other amounts receivable line on the Asset Page, Supplemental Health Care Exhibit, Exhibit 3 – Health Care Receivables, and Exhibit 3A – Analysis of Health Care Receivables.

Bruggeman stated that this proposal is in response to the adopted revisions in *INT 24-02: Medicare Part D Prescription Payment Plan* by the Statutory Accounting Principles (E) Working Group on May 22. (The editorial revisions were minor, noting that the title blank is also impacted by the common asset page instructions.)

Bruggman made a motion, seconded by Hudson, to adopt the modifications to the proposal. The motion passed unanimously. Bruggman made a motion, seconded by Hudson, to adopt the modified proposal. (Attachment Two-O). The motion passed unanimously.

P. Agenda Item 2025-15BWG

Eft stated that this proposal updates Note 8—Derivatives in the Notes to Financial Statements and Schedule DB to clarify the terminology used for derivative financing premium.

Bruggeman stated that this proposal is in response to the adopted Statutory Accounting Principles (E) Working Group revisions in agenda item 2024-23. The revisions clarify the terminology used for derivative financial premiums. The industry comments were editorial to update the column references.

Bruggman made a motion, seconded by Drutz, to adopt the modifications to the proposal. The motion passed unanimously. Bruggman made a motion, seconded by Drutz, to adopt the modified proposal (Attachment Two-P). The motion passed unanimously.

3. Exposed New Items

A. Agenda Item 2025-16BWG

Eft stated that this proposal updates the Health Annual Statement Instructions for the Prescribed Language for Statement of Actuarial Opinion, Section 4 (Identification Section) for consistency in reporting, and updates the Statement of Actuarial Opinion, Section 7 (Opinion Section), Item C, to be consistent with the Life Annual Statement Instructions and *Valuation Manual* (VM)-30, Actuarial Opinion and Memorandum Requirements.

Richard stated that the annual statement instructions provide the option for actuaries to use additional wording or revised wording if they have an unusual situation, which notifies regulators of the need for further review. One situation that has occurred is where actuaries used revised language to indicate that they do not work for the insurance company directly but for a company within the group. He indicated that this type of situation is becoming more common, which is why language is being added to address that situation. Richard stated that changes are also included to be consistent with VM-30 in that actuaries can state that the reserves meet the requirements of any state in which the company is licensed.

Hearing no objection, Eft stated that the proposal would be considered exposed for a 45-day public comment period ending July 14.

4. Adopted the Editorial Listing

Eft stated that there are a large number of editorial changes for this meeting, which is unusual. The listing is Attachment 19 in the meeting materials. The changes address minor corrections or the need for instruction clarifications to ensure accurate reporting. These were brought to the attention of NAIC staff by state insurance regulators, interested parties, or were identified by NAIC staff in their review of instructions and filings. The changes related to the Notes to Financial Statement have been approved by the Statutory Accounting Principles (E) Working Group support staff. There are several editorial changes related to crosscheck corrections; column or line reference corrections and clarifications in the Notes to the Financial Statements; clarifying language and page reference corrections for the AVR exhibit and a few that impact the investment schedules; and minor editorial changes to four other exhibits.

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

5. Discussed Wet Signatures Versus Electronic Signatures on the Jurat Page

Eft stated that the NAIC Legal Department searched the various state statues/regulations regarding hard copy/wet/other signature requirements for the statutory financial statements submitted to the NAIC and were unable to identify anything that would preclude the new Financial Data Repository (FDR) system from using digital signature technology, which is currently being used for other NAIC support functions in the e-commerce arena.

Based on initial feedback, NAIC staff recognize that many state insurance regulators utilize the statutory financial statement PDF files for various purposes. Therefore, the plan is to continue to include PDF files (or other similar sharing/archiving technology formats) in the new FDR system. However, in the new FDR system, NAIC staff would like to utilize digital signature technology for the jurat page signatures of the various statutory financial statement filings. The current FDR system's PDFs do not allow a separate digital signature to be attached/inserted once the PDF is finalized. As the new system is developed, NAIC staff would like to confirm acceptance of the use of digital signatures with the Blanks (E) Working Group, chief financial regulators at the Chief Financial Regulators Forum, and with any other group that might be affected by this change.

Hudson stated that he would like to research this in his state before giving an opinion. Tipton stated that the industry would advocate for this as it can be difficult to get wet signatures from officers in other states.

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

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		FOR NAIC USE ONLY
	DATE: 4/25/2025	Agenda Item # 2025-16BWG MOD Year 2026 Changes to Existing Reporting [X] New Reporting Requirement [ ]
CONTACT PERSON:	Matthew W. Richard	
TELEPHONE:	(512) 676-6855	
EMAIL ADDRESS:	Matthew.Richard@tdi.texas.gov	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT** No Impact [X] Modifies Required Disclosure [ ]
ON BEHALF OF:		
NAME:	Matthew W. Richard	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
TITLE:	Life & Health Actuary	
AFFILIATION:	Texas Department of Insurance	**DISPOSITION**
ADDRESS:	PO BOX 12030 Austin, TX 78711	[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date _____ [ ] Rejected Date _____ [ ] Deferred Date _____ [ ] Other (Specify) _____

BLANK(S) TO WHICH PROPOSAL APPLIES

[X] **ANNUAL STATEMENT**	[X] **INSTRUCTIONS**	[ ] **CROSSCHECKS**
[ ] **QUARTERLY STATEMENT**	[ ] **BLANK**	
[ ] Life, Accident & Health/Fraternal	[ ] Separate Accounts	[X] Title
[ ] Property/Casualty	[ ] Protected Cell	[ ] Other _____
[X] Health	[ ] Health (Life Supplement)	[ ] Life (Health Supplement)

Anticipated Effective Date: Annual 2026

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Health Annual Statement Instructions for the Prescribed Language for Statement of Actuarial Opinion, Section 4 (Identification Section) for consistency in reporting. Also update the Statement of Actuarial Opinion, Section 7 (Opinion Section), Item C, to be consistent with the Life Annual Statement Instructions and VM-30.

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

Upon the sponsor's review of the 2024 Statements of Actuarial Opinion, it was noticed that many actuaries, in very similar circumstances, are selecting the 'revised wording' option and then using very similar language. If the options for prescribed wording are updated to more fully accommodate current practice, then use of revised wording will become a more reliable indicator of a situation requiring further review.

*****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**

ACTUARIAL OPINION

Detail Eliminated To Conserve Space

4. The IDENTIFICATION section should specifically indicate the appointed actuary's relationship to the company, qualifications for acting as appointed actuary, date of appointment, and should specify that the appointment was made by the Board of Directors, or its equivalent or by a committee of the Board.

A person who is not a Member of the American Academy of Actuaries but is recognized by the Academy as qualified must attach, each year, a copy of the approval letter from the Academy.

This section should contain only one of the following:

For a Member of the American Academy of Actuaries who is an employee of the organization, the opening paragraph of the opinion should contain all the following sentences if the appointed actuary is using the prescribed wording:

"I, (name and title of actuary), am an employee of (named organization; or organization name, a group name company of which insurance company name is an affiliate) and a member of the American Academy of Actuaries. I was appointed on [date of appointment] in accordance with the requirements of the annual statement instructions. I meet the Academy qualification standards for rendering the opinion."

For a consultant who is a Member of the American Academy of Actuaries, the opening paragraph of the opinion should contain all the following sentences if the appointed actuary is using the prescribed wording:

"I, (name and title of consultant), am associated with the firm of (name of firm). I am a member of the American Academy of Actuaries and have been retained by the (name of organization) to render an opinion with regard to loss reserves, actuarial liabilities, actuarial assets and related items. I was appointed on [date of appointment] in accordance with the requirements of the annual statement instructions. I meet the Academy qualification standards for rendering the opinion."

For an employee other than a member of the American Academy of Actuaries, the opening paragraph of the opinion should contain both the following sentences if the appointed actuary is using the prescribed wording:

"I, (name and title), am an employee of (name of organization; or organization name, a group name company of which insurance company name is an affiliate) and am recognized by the American Academy of Actuaries as qualified to perform actuarial valuations for organizations of this kind. I was appointed on [date of appointment] in accordance with the requirements of the annual statement instructions."

For a consultant other than a member of the American Academy of Actuaries, the opening paragraph of the opinion should contain all the following sentences if the appointed actuary is using the prescribed wording:

"I, (name and title of consultant), am associated with the firm of (name of firm). I am recognized by the American Academy of Actuaries as qualified to perform actuarial valuations for organizations of this kind and have been retained by the (name of organization) with regard to such valuation. I was appointed on [date of appointment] in accordance with the requirements of the annual statement instructions."

Detail Eliminated To Conserve Space

7. The OPINION section should include only the following statement if the appointed actuary is using the prescribed wording:

"In my opinion, the amounts carried in the balance sheet on account of the items identified above:

A. Are in accordance with accepted actuarial standards consistently applied and are fairly stated in accordance with sound actuarial principles;

B. Are based on actuarial assumptions relevant to contract provisions and appropriate to the purpose for which the statement was prepared;

C. Meet the requirements of the Insurance Laws and regulations of the state of [state of domicile] and:

(Use of one the following phrases, as appropriate, is considered prescribed wording. Replacing "[list states]" with an actual list of states in parentheses is also considered prescribed wording.)

the loss reserves and actuarial liabilities are at least as great as the minimum aggregate amounts required by any state in which this company is licensed,

or

the loss reserves and actuarial liabilities are at least as great as the minimum aggregate amounts required by any state in which this company is licensed with the exception of the following states [list states]. For each listed state a separate statement of actuarial opinion was submitted to that state that complies with the requirements of that state;

D. Make a good and sufficient provision for all unpaid claims and other actuarial liabilities of the organization under the terms of its contracts and agreements;

E. Make a reasonable provision for all actuarial assets of the organization under the terms of its contracts and agreements;

F. On a combined basis, make a reasonable provision for all actuarial assets and actuarial liabilities of the organization under moderately adverse conditions;

G. Are computed on the basis of assumptions and methods consistent with those used in computing the corresponding items in the annual statement of the preceding year-end; and

H. Include appropriate provision for all actuarial items that ought to be established.

The Underwriting and Investment Exhibit, Part 2B was reviewed for reasonableness and consistency with the applicable Actuarial Standards of Practice.

Actuarial methods, considerations, and analyses used in forming my opinion conform to the relevant Standards of Practice as promulgated from time to time by the Actuarial Standards Board, which standards form the basis of this statement of opinion."

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Blanks (E) Working Group
Editorial Revisions to the Blanks and Instructions
(presented at the August 6, 2025, 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
2025	Schedule S, Part 8	**CHANGE TO BLANK** Revise descriptions on lines 163 and 165 to clarify that line 163 should be the sum of all sections and lines 163 plus 164 equal line 165. 163 Total ~~other invested~~ assets ~~– Schedules BA & DA &~~ ~~E~~excluding non-guaranteed Separate Account assets (Sum of Lines 33, 57, 74, 78, 86, 94, 121, 127, 131, 136, 149, 156 and 162) 164 Total non-guaranteed Separate Account assets 165 Total assets including non-guaranteed Separate Account assets (Sum of 163 and 164)	L/F	Annual
2025	General Interrogatories	**CHANGE TO BLANK** Update line numbers in chart for line 2.71 to agree with electronic specifications, add total lines by section and grand total. 2.71A00~~0~~01 Pension risk transfer group annuities 2.71A9999 Total pension risk transfer group annuities 2.71B00~~0~~01 All other group annuities 2.71B9999 Total all other group annuities 2.71C00~~0~~01 Registered index linked annuities individual annuities 2.71C9999 Total registered index linked annuities individual annuities 2.71D00~~0~~01 All other individual annuities 2.71D9999 Total all other individual annuities 2.71E00~~0~~01 Life insurance 2.71E9999 Total life insurance 2.71F9999 Total all product types	SA	Annual

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Effective	Table Name	Description	Statement Type	Filing Type
2025	Supplemental Health Care Exhibit Part 1	**CHANGE TO BLANK** Remove reference to Footnote 2 in line 7 as Footnote 2 was removed in proposal 2024-15BWG. 7. Preliminary medical loss ratio: MLR (Lines 4 + 5.0 + 6.6~~ – Footnote 2.0~~) / Line 1.8		
2025	Asset Valuation Reserve Equity and Other Invested Asset Component	**CHANGE TO INSTRUCTION** Update the instructions for Line 80 and Line 81 to match the changes to Schedule BA. Line 80 – ~~Fixed Income Instruments~~Bonds – Unaffiliated Report the book/adjusted carrying value of all Schedule BA assets in Line ~~4699999~~ 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 81 – ~~Fixed Income Instruments~~Bonds – Affiliated Report the book/adjusted carrying value of all Schedule BA assets in Line ~~4799999~~ 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.	L/F	Annual
2025	Life State Page	**CHANGE TO INSTRUCTION** Update the instructions for Line 14/15 to be consistent with the instructions for Line 16 through 22 for the Life State Page. Column 14 – Totals Paid – Pols\Certs Column 15 – Totals Paid – Amount Provide the amount for claims paid and the number of policies\certificates for the claims paid. These columns are only applicable to life and annuity contracts (Lines 1 through 33).	H, L/F	Annual

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Effective	Table Name	Description	Statement Type	Filing Type
2025 / 2026	Notes to Financial Statements	**CHANGE TO INSTRUCTION** Remove the reference to Life RBC in the reporting note for Note 5L(2) illustration. (2) Detail of Assets Pledged as Collateral Not Captured in Other Categories (Contracts that Share Similar Characteristics, Such as Reinsurance (excluding Modco/FWH) and Derivatives, Are Reported in the Aggregate) ***Table Excluded to Conserve Space*** (a) Total Line for Columns 1 through 3 should equal 5L(1)m Columns 1 through 3 respectively and Total Line for Column 4 should equal 5L(1)m Column 5 Note: The amount of pledged under derivative contracts should agree to Schedule DB~~ and agree to what is subtracted from the life RBC formula~~.	H, T	Annual / Quarterly
2025 / 2026	Notes to Financial Statements	**CHANGE TO INSTRUCTION** Remove the reference to Life RBC in the reporting note for Note 5L(2) illustration. (2)Detail of Assets Pledged as Collateral Not Captured in Other Categories (Contracts that Share Similar Characteristics, Such as Reinsurance (excluding Modco/FWH) and Derivatives, Are Reported in the Aggregate) ***Table Excluded to Conserve Space*** (a) Subset of column 1 (b) Subset of column 3 (c) Total Line for Columns 1 through 7 should equal 5L(1)m Columns 1 through 7 respectively and Total Line for Columns 8 through 10 should equal 5L(1)m Columns 9 through 11 respectively **Note: The amount of pledged under derivative contracts should agree to Schedule DB~~ and agree to what is subtracted from the life RBC formula~~.**	P	Annual / Quarterly

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Effective	Table Name	Description	Statement Type	Filing Type
2025/ 2026	Notes to Financial Statements	**CHANGE TO INSTRUCTION** Update the illustration for Note 5L(4) to make the related party code illustration a continuation of the previous illustration table. The update will add column numbers to the illustration and update the Assets row labels to match the previous illustration table in Note 5L(4). Update is for Annual 2025 / Quarterly 2026.	H, T	Annual / Quarterly

Assets	9 Book/Adjusted Carrying Value (BACV)	10	11	12	13	14	15
		Related Party Code					
	FWH Including Modco	1	2	3	4	5	6
~~o~~a. Cash, Cash Equivalents and Short-Term Investments	$	$	$	$	$	$	$ .....
~~p~~b. Schedule D, Part 1, Section 1	.....	.....	.....	.....	.....	.....	.....
~~q~~c. Schedule D, Part 1, Section 2	.....	.....	.....	.....	.....	.....	.....
~~r~~d. Schedule D, Part 2, Section 1	.....	.....	.....	.....	.....	.....	.....
~~s~~e. Schedule D, Part 2, Section 2	.....	.....	.....	.....	.....	.....	.....
~~t~~f. Schedule B	.....	.....	.....	.....	.....	.....	.....
~~u~~g. Schedule A	.....	.....	.....	.....	.....	.....	.....
~~v~~h. Schedule BA, Part 1	.....	.....	.....	.....	.....	.....	.....
~~w~~i. Schedule DL, Part 1	.....	.....	.....	.....	.....	.....	.....
~~x~~j. Other	.....	.....	.....	.....	.....	.....	.....
~~y~~k. Total Assets (a+b+c+d+e+f+g+h+i+j ~~o+p+q+r+s+t+u+v+w+x~~)	$	$	$	$	$	$	$
l. Percentage to Total FWH Assets (including Modco)	..... %	..... %	%	%	%	%	%

1 2

Effective	Table Name	Description	Statement Type	Filing Type
		Amount / % of Liability to Total Liabilities ~~*~~# ~~l~~m. Recognized Obligation to Return Collateral Asset $ .... % ~~m~~n. Recognized Obligation for Modco assets $ .... % ~~n~~o. Recognized Obligation for FWH (excluding Modco) assets $ .... % ~~*~~# ~~l +~~ m + n + o = Column 1 divided by Liability Page, Line 24 (Column 3)		
2025/ 2026	Notes to Financial Statements	**CHANGE TO INSTRUCTION** Update the illustration for Note 5L(4) to make the related party code illustration a continuation of the previous illustration table. The update will add column numbers to the illustration and update the Assets row labels to match the previous illustration table in Note 5L(4). Update is for Annual 2025 / Quarterly 2026.	L/F	Annual / Quarterly

Assets	9	10	11	12	13	14	15
	Book/Adjusted Carrying Value (BACV)	Related Party Code					
	FWH Including Modco	1	2	3	4	5	6
General Account:							
~~cc~~a. Cash, Cash Equivalents and Short-Term Investments	$	$	$	$	$	$	$ .....
~~dd~~b. Schedule D, Part 1, Section 1	.....	.....	.....	.....	.....	.....	.....
~~ee~~c. Schedule D, Part 1, Section 2	.....	.....	.....	.....	.....	.....	.....
~~ff~~d. Schedule D, Part 2, Section 1	.....	.....	.....	.....	.....	.....	.....
~~gg~~e. Schedule D, Part 2, Section 2	.....	.....	.....	.....	.....	.....	.....
~~hh~~f. Schedule B	.....	.....	.....	.....	.....	.....	.....
~~ii~~g. Schedule A	.....	.....	.....	.....	.....	.....	.....
~~jj~~h. Schedule BA, Part 1	.....	.....	.....	.....	.....	.....	.....

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~~kk~~i. Schedule DL, Part 1	.....	.....	.....	.....	.....	.....	.....
~~ll~~j. Other	.....	.....	.....	.....	.....	.....	.....
~~mm~~k. Total Assets (a+b+c+d+e+f+g+h+i+j~~cc+dd+ee+ff+gg+hh+ii+jj+kk+ll~~)	$	$	$	$	$	$	$
l. Percentage to Total FWH Assets (including Modco)	..... %	..... %	..... %	..... %	..... %	..... %	.....%
Separate Account:							
~~nn~~m. Cash, Cash Equivalents and Short-Term Investments	$	$	$	$	$	$	$ .....
~~oo~~n. Schedule D, Part 1, Section 1	.....	.....	.....	.....	.....	.....	.....
~~pp~~o. Schedule D, Part 1, Section 2	.....	.....	.....	.....	.....	.....	.....
~~qq~~p. Schedule D, Part 2, Section 1	.....	.....	.....	.....	.....	.....	.....
~~rr~~q. Schedule D, Part 2, Section 2	.....	.....	.....	.....	.....	.....	.....
~~ss~~r. Schedule B	.....	.....	.....	.....	.....	.....	.....
~~tt~~s. Schedule A	.....	.....	.....	.....	.....	.....	.....
~~uu~~t. Schedule BA, Part 1	.....	.....	.....	.....	.....	.....	.....
~~vv~~u. Schedule DL, Part 1	.....	.....	.....	.....	.....	.....	.....
~~ww~~v. Other	.....	.....	.....	.....	.....	.....	.....
~~xx~~w. Total Assets (m+n+o+p+q+r+s+t+u+v~~nn+oo+pp+qq+rr+ss+tt+uu+vv+ww+xx~~)	$	$	$	$	$	$	$
x. Percentage to Total FWH Assets (including Modco)	..... %	..... %	..... %	..... %	..... %	..... %	.....%

	1	2
	Amount	% of Liability to Total Liabilities *#
~~ww~~y. Recognized Obligation to Return Collateral Asset (General Account)	$	%

Effective	Table Name	Description	Statement Type	Filing Type
		~~x~~z. Recognized Obligation to Return Collateral Asset (Separate Account) $ ..... % ~~y~~aa. Recognized Obligation for Modco assets (General Account) $ ..... % ~~z~~bb. Recognized Obligation for Modco assets (Separate Account) $ ..... % ~~aa~~cc. Recognized Obligation FWH (excluding Modco) assets (General Account) $ ..... % ~~bb~~dd. Recognized Obligation FWH (excluding Modco) assets (Separate Account) $ ..... % ~~*~~# ~~w + y + aa~~y + aa + cc = Column 1 divided by Liability Page, Line 26 (Column 1) ~~x + z + bb~~z + bb + dd = Column 1 divided by Liability Page, Line 27 (Column 1)		
2025/ 2026	Notes to Financial Statements	**CHANGE TO INSTRUCTION** Update the illustration for Note 5L(4) to make the related party code illustration a continuation of the previous illustration table. The update will add column numbers to the illustration and update the Assets row labels to match the previous illustration table in Note 5L(4). Update is for Annual 2025 / Quarterly 2026.	P/C	Annual / Quarterly

Assets	9 Book/Adjusted Carrying Value (BACV)	10	11	12	13	14	15
		Related Party Code					
	FWH Including Modco	1	2	3	4	5	6
General Account:							
~~cc~~a. Cash, Cash Equivalents and Short-Term Investments	$	$	$	$	$	$	$ .....
~~dd~~b. Schedule D, Part 1, Section 1	.....	.....	.....	.....	.....	.....	.....
~~ee~~c. Schedule D, Part 1, Section 2	.....	.....	.....	.....	.....	.....	.....
~~ff.~~d Schedule D, Part 2, Section 1	.....	.....	.....	.....	.....	.....	.....

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Effective	Table Name	Description								Statement Type	Filing Type
		~~gge~~. Schedule D, Part 2, Section 2	.....	.....	.....	.....	.....	.....	.....		
		~~hhf~~. Schedule B	.....	.....	.....	.....	.....	.....	.....		
		~~iig~~. Schedule A	.....	.....	.....	.....	.....	.....	.....		
		~~jjh~~. Schedule BA, Part 1	.....	.....	.....	.....	.....	.....	.....		
		~~kki~~. Schedule DL, Part 1	.....	.....	.....	.....	.....	.....	.....		
		~~llj~~. Other	.....	.....	.....	.....	.....	.....	.....		
		~~mmk~~. Total Assets (a+b+c+d+e+f+g+h+i+j~~cc+dd+ee+ff+gg+hh+ii+jj+kk+ll~~)	$	$	$	$	$	$	$		
		l. Percentage to Total FWH Assets (including Modco)	XXX	XXX	XXX	XXX	XXX	XXX	XXX		
		Protected Cell:									
		~~nn~~m. Cash, Cash Equivalents and Short-Term Investments	$	$	$	$	$	$	$		
		~~oo~~n. Schedule D, Part 1, Section 1	.....	.....	.....	.....	.....	.....	.....		
		~~pp~~o. Schedule D, Part 1, Section 2	.....	.....	.....	.....	.....	.....	.....		
		~~qq~~p. Schedule D, Part 2, Section 1	.....	.....	.....	.....	.....	.....	.....		
		~~rr~~q. Schedule D, Part 2, Section 2	.....	.....	.....	.....	.....	.....	.....		
		~~ss~~r. Schedule B	.....	.....	.....	.....	.....	.....	.....		
		~~tt~~s. Schedule A	.....	.....	.....	.....	.....	.....	.....		
		~~uu~~t. Schedule BA, Part 1	.....	.....	.....	.....	.....	.....	.....		
		~~vv~~u. Schedule DL, Part 1	.....	.....	.....	.....	.....	.....	.....		
		~~ww~~v. Other	.....	.....	.....	.....	.....	.....	.....		
		~~xx~~w. Total Assets (m+n+o+p+q+r+s+t+u+v~~nn+oo+pp+qq+rr+ss+tt+uu+vv+ww~~)	$	$	$	$	$	$	$		
		x. Percentage to Total FWH Assets (including Modco)									
							1	2			

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Effective	Table Name	Description	Statement Type	Filing Type
		Amount / % of Liability to Total Liabilities ~~*~~#		
		~~w~~y. Recognized Obligation to Return Collateral Asset (General Account) $ %		
		~~x~~z. Recognized Obligation to Return Collateral Asset (Protected Cell) $ %		
		~~y~~aa. Recognized Obligation for Modco assets (General Account) $ ..... %		
		~~z~~bb. Recognized Obligation for Modco assets (Protected Cell) $ ..... %		
		~~aa~~cc. Recognized Obligation for FWH (excluding Modco) assets (General Account) $ ..... %		
		~~bb~~dd. Recognized Obligation for FWH (excluding Modco) assets (Protected Cell) $ ..... %		
		~~*~~# ~~w + y + aa~~y + aa + cc = Column 1 divided by Liability Page, Line 26 (Column 1) ~~x + z + bb~~z + bb + dd= Column 1 divided by Liability Page, Line 27 (Column 1)		
2025/ 2026	Notes to Financial Statement	**CHANGE TO INSTRUCTION** Update the illustration for Note 5L(5) to add a formula clarification in the Total row. Update is for Annual 2025 / Quarterly 2026.	H, L/F, P/C, T	Annual / Quarterly

	Collateral Held	Modco	FWH
a. Securities Lending			
b. Repo / repurchase Agreements			
c. Placed under option contracts			
d. On deposit with states			
e. On deposit with other regulatory bodies			
f. Pledged as collateral to FHLB (including assets backing funding agreements)			
g. Pledged as collateral not captured in other categories			
h. Total (a+b+c+d+e+f+g)			

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<table>
<tr><th>Effective</th><th>Table Name</th><th>Description</th><th>Statement Type</th><th>Filing Type</th></tr>
<tr><td>2025</td><td>Notes to Financial Statement</td><td>

CHANGE TO INSTRUCTION

Update the header for Note 11C to Current Year/Prior Year – verified with sponsor of adopted proposal 2025-01BWG.

<table>
<tr><th></th><th colspan="2">~~20x2~~Current Year</th><th colspan="2">~~20x1~~Prior Year</th></tr>
<tr><th></th><th>Unused Commitments</th><th>Unused Lines Of Credit</th><th>Unused Commitments</th><th>Unused Lines Of Credit</th></tr>
<tr><td>Short-Term (contracts terminating in 12 months or less)</td><td>$ .....</td><td>$ .....</td><td>$ .....</td><td>$ .....</td></tr>
<tr><td>Long-Term (contracts terminating in more than 12 months)</td><td>$ .....</td><td>$ .....</td><td>$ .....</td><td>$ .....</td></tr>
<tr><td>Total</td><td>$ .....</td><td>$ .....</td><td>$ .....</td><td>$ .....</td></tr>
</table>

</td><td>H, L/F, P/C, T</td><td>Annual</td></tr>
<tr><td>2025/ 2026</td><td>Notes to Financial Statement</td><td>

CHANGE TO INSTRUCTION

Update to clarify all parts of 28C are to be data captured. Update is for Annual 2025 / Quarterly 2026.

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR ~~THE~~ TABLE<u>S 28C1 THROUGH 28C3</u> BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

C. Medicare Prescription Payment Plan Receivables

(1) Amounts included in other health care receivables which are recoverable from participants in Medicare Part D Prescription Payment Plan for the current reporting period $_____ .

(2) Aging of other health care receivables which are due from participant in Medicare Part D Prescription Payment Plan.

<table>
<tr><th>1
Name of Plan</th><th>2
Current Period Gross*</th><th>3
1 - 30 Days</th><th>4
31 - 60 Days</th><th>5
61 - 90 Days</th><th>6
Over 90 Days</th><th>7
Nonadmitted</th><th>8
Admitted</th></tr>
<tr><td>Medicare Prescription Payment Plan Recoverables .....</td><td>.....</td><td>.....</td><td>.....</td><td>.....</td><td>.....</td><td>.....</td><td>.....</td></tr>
</table>

*represents the Assets Page Column 1, included within Line 24 before nonadmission.

</td><td>H, L/F, P/C</td><td>Annual / Quarterly</td></tr>
</table>

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Effective	Table Name	Description	Statement Type	Filing Type
		(3) Incurred claims expense includes write-offs of impaired Medicare Prescription Payment Plan receivables of $_____ for [current year] and $_____ for [prior year].		
2025	Schedule DA Verification Between Years	**CHANGE TO INSTRUCTION** Update the Column references for the total column in the instructions to match the adopted revisions to Sch DA VBY in proposal 2024-02BWG. Column 1 – Total Equals the sum of Columns 2 through ~~5~~3.	H, L/F, P/C, T, SA	Annual
2025	Schedule D, Part 1A	**CHANGE TO INSTRUCTION** Update the 2025 Reporting Note to open columns 9 and 10 for Section 53 – Total Bonds Prior Year. This section is being open up because Columns 1-6 are already open and they need a total column (Column 9). The 2025 reporting note was initially added so reporting entities wouldn't need to split their prior year numbers by all the new sections. Section 53 is a total section so it won't need to be split by the new sections. **Note:** Prior Year Column 9 and 10 will not be available until 2026 reporting on all sections except Section 53. Columns 9 and 10, Section 53 for prior year data should be a summation of columns 1 through 6.	H, L/F, P/C, T	Annual
2025	Schedule D, Part 1A	**CHANGE TO INSTRUCTION** Remove the reference to Schedule DA, Part 1 and Schedule E, Part 2 from the Section 14 and 15 instructions as these securities are not reported as short-term or cash equivalents. Section 14. SVO-Identified Bond Exchange Traded Funds – Fair Value Line 0149999999 from Schedule D, Part 1, Section 1, Column 8~~; Schedule DA, Part 1, Column 6; and Schedule E, Part 2, Column 7~~. Section 15. SVO-Identified Bond Exchange Traded Funds – Systematic Value Line 0159999999 from Schedule D, Part 1, Section 1, Column 8~~; Schedule DA, Part 1, Column 6; and Schedule E, Part 2, Column 7~~.	H, L/F, P/C, T	Annual

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<table>
<tr><th>Effective</th><th>Table Name</th><th>Description</th><th>Statement Type</th><th>Filing Type</th></tr>
<tr><td>2025/
2026</td><td>Summary of Operations</td><td>

CHANGE TO INSTRUCTION

Add the Medicare Part D Prescription Payment Plan clarification to the annual 2025 and quarterly 2026 instructions. This change was adopted for the Annual Analysis of Operations in proposal 2025-14BWG

Line 13 – Disability Benefits and Benefits Under Accident and Health Contracts

Exclude: Amounts attributable to uninsured accident and health plans and the uninsured portions of partially insured plans.

Include: Medicare Part D Prescription Payment Plan receivables from participants which have been impaired (and included in claims when written off) – Refer to *INT 24-02:Medicare Prescription Payment Plan* for accounting guidance.

</td><td>L/F</td><td>Annual / Quarterly</td></tr>
<tr><td>2026</td><td>General Interrogatories, Part 1 Investment</td><td>

CHANGE TO BLANK

Remove the LEI column in Quarterly Interrogatory # 17.6 to be consistent with the adoptions in proposal 2023-06BWG.

17.6 For those firms or individuals listed in the table for 17.5 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the inf for the table below.

<table>
<tr><th>1
Central Registration Depository Number</th><th>2
Name of Firm or Individual</th><th>~~3~~
~~Legal Entity Identifier (LEI)~~</th><th>4
Registered With</th><th>5
Investme Managem Agreement (IM</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
</table>

</td><td>H, L/F, P/C, T</td><td>Quarterly</td></tr>
</table>

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Effective	Table Name	Description	Statement Type	Filing Type
2026	Statement of Revenue and Expenses	**CHANGE TO INSTRUCTION** Add the Medicare Part D Prescription Payment Plan clarification to the quarterly instructions. This change was adopted for the Annual Statement of Revenue and Expenses in proposal 2025-14BWG. Line 13 – Prescription Drugs Include: Expenses for Prescription Drugs and other pharmacy benefits covered by the reporting entity. Medicare Part D Prescription Payment Plan receivables from participants which have been impaired (and included in claims when impaired and written off) – Refer to *INT 24-02:Medicare Prescription Payment Plan* for accounting guidance. Deduct: Pharmaceutical rebates relating to insured plans. Exclude: Prescription drug charges that are included in a hospital billing, which should be classified as Hospital/Medical Benefits on Line 9.	H	Quarterly
2026	Schedule DA – Verification Between Years	**CHANGE TO INSTRUCTION** Update the column reference to Schedule DA, Part 1 as the column changed in 2025 annual with the bond project. Line 1 – Book/Adjusted Carrying Value, December 31 of Prior Year In Column 1, report the book/adjusted carrying value per Schedule DA, Part 1, Column ~~7~~ 6 of the prior year's annual statement.	H, L/F, P/C, T, SA	Annual

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Blanks (E) Working Group
Summary of Comments for August 6, 2025
National Meeting

ITEMS RECEIVED FOR COMMENT

Reference Number	Description
2025-16BWG	Update Health Annual Statement Instructions for the Prescribed Language for Statement of Actuarial Opinion, Section 4 (Identification Section) for consistency in reporting. Also update the Statement of Actuarial Opinion, Section 7 (Opinion Section), Item C, to be consistent with the Life Annual Statement Instructions and VM-30.

Comment #1 – Industry Interested Parties Attachment 5 Page 1 of 1

IPs have no comment.

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NAIC Blanks Working Group – Interested Parties	
Tip Tipton, CPA Thrivent, Head of Accounting Policy	Phone: 612.844.7298 Email: tip.tipton@thrivent.com

July 14, 2025

Mr. Roy Eft, Chair
Blanks Working Group
National Association of Insurance Commissioners
1100 Walnut St.
Kansas City, MO 64106

SUBJECT: Blanks Working Group ("BWG") proposal exposed during the conference call on May 29, 2025

Dear Mr. Eft:

Interested Parties ("IPs") appreciate the opportunity to review and comment on the 1 proposal that was exposed during the conference call held by BWG on Thursday, May 29, 2025.

2025-16BWG [Update the Health Annual Statement Instructions for the Prescribed Language for Statement of Actuarial Opinion, Section 4 (Identification Section) for consistency in reporting. Also update the Statement of Actuarial Opinion, Section 7 (Opinion Section), Item C, to be consistent with the Life/Fraternal Annual Statement Instructions and VM-30. Anticipated effective date is Annual 2026.]

IPs have no comment.

* * * *

Thank you for the opportunity to comment on the above item. Please feel free to contact me if you have any questions or would like to discuss further.

Tip Tipton, CPA
Head of Accounting Policy
Thrivent

CC: Steve Drutz, Vice-Chair, Washington
Mary Caswell, NAIC
Jill Youtsey, NAIC
Keith Bell, Travelers
Rose Albrizio, Equitable Financial
Interested Parties

FINAL