

Draft date: 10/30/2024

*Virtual Meeting*

**NATIONAL TREATMENT AND COORDINATION (E) WORKING GROUP**

Nov. 4, 2024

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

**ROLL CALL**

Debbie Doggett/Kelly		Ursula Almada	New Mexico
Hopper/Co-Chair	Missouri	Kirsten Anderson	Oregon
Cameron Piatt, Co-Chair	Ohio	Karen Feather	Pennsylvania
Cindy Hathaway	Colorado	Amy Garcia	Texas
William Mitchell	Connecticut	Jay Sueoka	Utah
Sherry Wilson	Delaware	Ron Pastuch	Washington
Jennifer Milam	Florida	Amy Malm/Mark McNabb	Wisconsin
Matthew Stewart/Lorie Gasior	Louisiana	Tracy McEwen	Wyoming
Kari Leonard	Montana		

NAIC Support Staff: Jane Barr

**AGENDA**

1. Discuss Comments on *Company Licensing Best Practices Handbook* —*Debbie Doggett (MO)*
  - a. *Company Licensing Best Practices Handbook (pages 1-28)* Attachment 1a
2. Consider Edits to the Expansion Application Instructions 2024-07)—*Cam Piatt (OH)*
  - a. Proposal Form (Explanation of Changes) Attachment 2a
  - b. Expansion Application Template Attachment 2b
3. Discuss Pre and Post Redomestication Notification—*Cam Piatt (OH)*
  - a. Pre-Notification Attachment 3a
  - b. Post-Notification Attachment 3b
  - c. Redomestication State Chart Attachment 3c
4. Discuss Biographical Affidavits and Background Reports —*Debbie Doggett (MO)*
  - a. Biographical Affidavits Acceptance
  - b. Background Report Consistency
  - c. Vendor Venting Process/Guidelines
5. Discuss Any Other Matters Brought Before the Working Group —*Debbie Doggett (MO)*
6. Adjournment

## NAIC Company Licensing Best Practices Handbook

<b>Introduction</b>	1
Background	2
UCAA Instructions vs. Best Practices Handbook	2
Description of the Best Practices Handbook	3
<b>Appendix A – The Uniform Certificate of Authority Application (UCAA)</b>	4
<b>Appendix B – Use of Electronic Documents</b>	4
<b>Appendix C – Review of Electronic Application Coordination and Processing (REACAP)</b>	4
<b>Appendix D – Form A Review Best Practices</b>	4
<b>Appendix E – Speed to Market</b>	4
<b>The Company Licensing Function</b>	5
<b>Interstate Communication</b>	7
Initiating Interstate Communication	8
Lead State	9
Key State	109
Communications and the Domiciliary State	109
<b>Best Practices: Conceptual Framework of Processes and Procedures</b>	<b>Error! Bookmark not defined.11</b>
Chapter Overview	1212
Components of the Company Licensing Function	1212
<b>Administrative</b>	<b>1212</b>
Coordination	1212
Timeliness	1313
Administrative Filing	1313
<b>Analytical Review</b>	<b>1313</b>
Analysis of Current Condition	1313
<b>Prioritization Framework</b>	<b>1414</b>
Use of Prioritization Factors in Application Review	1414
Priority 1	1515
Priority 2	1515
Priority 3	1616
Priority 4	1717
Analysis of Business Plan	1717

## NAIC Company Licensing Best Practices Handbook

---

Intradepartmental Communications .....	1717
Timeliness of Review .....	1819
<b>Best Practices: Application Review .....</b>	<b>1920</b>
Introduction .....	2021
Confidentiality and Safeguarding of Biographical Affidavit Information .....	2021
<b>Administrative Safeguards .....</b>	<b>2021</b>
<b>Technical Safeguards .....</b>	<b>2122</b>
<b>Physical Safeguards.....</b>	<b>2122</b>
Primary Application .....	2324
Primary Application - Redomestication .....	3233
Expansion Application .....	3536
Corporate Amendment Application – Adding and Deleting Lines of Business.....	4749
Corporate Amendment Application – Name Change.....	5456
Corporate Amendment Application – Redomestication of a Foreign Insurer.....	5658
Corporate Amendment Application – Change of Statutory Home Office Address .....	5860
Corporate Amendment Application – Merger of Two or More Foreign Insurers.....	6062
Corporate Amendment Application – Proposed/Completed Change of Control of Foreign Insurers.....	6365
Corporate Amendment Application – Amended Articles of Incorporation .....	6668
Corporate Amendment Application – Amended Bylaws .....	6870
Corporate Amendment Application – Change of Mailing Address/Contact Notification ...	7072
Corporate Amendment Application – Uniform Consent to Service of Process .....	7173
Corporate Amendment Application – Statement of Withdrawal, Complete Surrender .....	7274
<b>Appendix A - The Uniform Certificate of Authority Application (UCAA).....</b>	<b>7476</b>
The UCAA.....	7577
<b>Primary Application.....</b>	<b>7577</b>
<b>Primary Application – Redomestication Only.....</b>	<b>7577</b>
<b>Primary Application Review Checklist.....</b>	<b>7779</b>
<b>Expansion Application.....</b>	<b>8183</b>
<b>Corporate Amendment Application .....</b>	<b>8284</b>
<b>UCAA Forms .....</b>	<b>8284</b>
Review of the UCAA .....	8385
<b>Appendix B – Use of Electronic Documents .....</b>	<b>8486</b>

---

*NAIC Company Licensing Best Practices Handbook*


---

<b>Appendix C – Review of Electronic Application Coordination and Processing (REACAP)</b>	
.....	<b><u>8688</u></b>
<b>REACAP Expedited Review Guidelines</b> .....	<b><u>8890</u></b>
<b>Appendix D – Form A Review Best Practices</b> .....	<b><u>9092</u></b>
<b>Initial Review</b> .....	<b><u>9193</u></b>
<b>Background, Identity and Risk Profile of Acquiring Persons</b> .....	<b><u>9193</u></b>
<b>Communication and Record Maintenance</b> .....	<b><u>9294</u></b>
<b>Transaction Review</b> .....	<b><u>9294</u></b>
<b>Purchase Consideration</b> .....	<b><u>9395</u></b>
<b>Target License Qualification/Insurer Operations</b> .....	<b><u>9395</u></b>
<b>Market Impact</b> .....	<b><u>9496</u></b>
<b>Post Approval Considerations, if applicable</b> .....	<b><u>9496</u></b>
<b>Post Acquisition Considerations</b> .....	<b><u>9496</u></b>
<b>Appendix E – Speed to Market</b> .....	<b><u>9698</u></b>
<b>Speed to Market</b> .....	<b><u>9799</u></b>

*NAIC Company Licensing Best Practices Handbook*  
Introduction

---

**Introduction**

## NAIC *Company Licensing Best Practices Handbook*

### Introduction

#### BACKGROUND

In conjunction with the NAIC, the various states, as a part of the former Accelerated Licensing Evaluation Review Technique (ALERT) Subgroup, have worked toward the goal of streamlining and achieving uniformity in the insurer licensing process. To that end, a Uniform Certificate of Authority Application (UCAA) was developed by the former Accelerated Licensing Evaluation Review Technique (ALERT) Subgroup and is currently in use. However, the implementation of UCAA requirements and the standards and procedures involved in the reviewing of applications has not proven to be consistent among the members of the NAIC.

The objective of the *Company Licensing Best Practices Handbook* (Best Practices Handbook) is to provide a framework that, while not preempting a state's authority, promotes consistent decisions while reviewing the standardized UCAA and improves the efficiency of the review process. This Best Practices Handbook is not intended to constitute a comprehensive company licensing procedures manual. Each state must assess its ability, within the confines of existing statutes, regulations and resource constraints, to implement the recommendations contained herein.

#### UCAA INSTRUCTIONS vs. BEST PRACTICES HANDBOOK

The ALERT Subgroup performed a monumental task in bringing order to the various state rules, regulations, requirements and forms facing an applicant. [The National Treatment and Coordination \(E\) Working Group has been monitoring updates to the application requirements and creation of the new electronic application portal.](#) That work is thoroughly documented on the UCAA website. This Best Practices Handbook contains numerous references to the forms and processes described on the UCAA website.

This Best Practices Handbook deals primarily with the qualitative processes involved in reviewing an application. The concepts and recommended processes and procedures described herein were developed through interviews with various state regulatory personnel involved in the company licensing process and a compilation of the observed best practices. During those interviews several "best practices" concepts became evident. They were:

- LICENSING PROCESSES: The company licensing function can be viewed in light of its component processes:
  - Administrative Filings: Receipt and processing of certain corporate documents that are needed to establish a corporate existence but are not subject to qualitative review.
  - Analysis of Current Financial Condition: Documentation of the current operating condition of the company.
  - Analysis of Business Plan: Review of the company's explanation for the proposed expansion and/or change in its operations and how those changes will affect the company's operating condition.

## NAIC *Company Licensing Best Practices Handbook*

### Introduction

---

- **INTERSTATE COMMUNICATION:** The licensing process in many states involves the re-determination of the current financial condition of the company. This information should already be known by the domestic state and can be conveyed to the applicant state. The effort saved by not reanalyzing company condition in the company license process can be used to communicate financial condition information to other states when requested.
- **PRIORITIZATION FRAMEWORK:** Several states incorporated more or less sophisticated prioritization systems as a part of the licensing function. The scope of the financial review may be adjusted based upon the prioritization of the insurer. The resources saved by reducing effort in reviewing companies on the top and bottom of the scale can be better spent performing a more thorough review of those companies where the effect of an expansion or amendment of the business plan is not so easily evident.

In addition to gathering information necessary to evaluate an applicant, the UCAA was developed to incorporate the majority of state's rules, regulations and requirements relative to company licensing. The goals of this Best Practices Handbook are uniformity and efficiency in the review of company licensing applications. In some instances, those goals conflict with filing requirements noted in the UCAA. Therefore, it is acknowledged that there may be inconsistencies between this Best Practices Handbook and any specific state's filing requirements.

### DESCRIPTION OF THE BEST PRACTICES HANDBOOK

#### **The Company Licensing Function**

This chapter provides an overview of the role of the company licensing function as the initial step in state regulatory oversight. The goals of the company licensing function and the risk-based approach to achieving them are described.

#### **Interstate Communication**

This chapter discusses a framework for communication and cooperation between an applicant state, the state of domicile and other stakeholder states (if any).

#### **Best Practices**

##### ***Conceptual Framework***

This chapter presents a risk-based framework for the processes involved in analyzing the application.

##### ***Review of Forms***

This chapter presents a summation of best practices compiled as guidance relative to the analysis and decision making regarding the application.

## NAIC *Company Licensing Best Practices Handbook*

### Introduction

---

#### **Appendix A – The Uniform Certificate of Authority Application (UCAA)**

This appendix presents a brief overview of the UCAA and how it is referenced in the “Best Practices: Application Review” chapter.

#### **Appendix B – Use of Electronic Documents**

This appendix presents a description of UCAA contents that are available in electronic media.

#### **Appendix C – Review of Electronic Application Coordination and Processing (REACAP)**

This appendix presents the criteria for requesting the National Treatment and Coordination (E) Working Group to monitor the timing, technology and substantive issues regarding the insurers’ electronic UCAA filings.

#### **Appendix D – Form A Review Best Practices**

This appendix presents a guide for regulatory review and analysis of Form A acquisitions, recognizing that this list may not be comprehensive and not all items will apply to every acquisition.

#### **Appendix E – Speed to Market**

This appendix presents the criteria for requesting the National Treatment and Coordination (E) Working Group to monitor the timing and coordination of expansion applications for insurers in good standing with their state of domicile (lead state).



*NAIC Company Licensing Best Practices Handbook*  
The Company Licensing Function

---

**The Company Licensing Function**

## NAIC *Company Licensing Best Practices Handbook* The Company Licensing Function

---

The company licensing function stands at the threshold of an insurance department's oversight of an applicant's future operations within the state. The function encompasses virtually all areas of regulatory oversight, from solvency surveillance to market conduct, to rates and forms and producers' licensing — and not only within the applicant state insurance department, but also within the insurance department of the domiciliary state. The most difficult stages of regulatory oversight occur at the very beginning and at the very end of an insurer's regulatory life cycle. Never is a more comprehensive understanding of an insurer and its potential for success more critical than when a regulator must grant authority to conduct business and in those even more difficult circumstances when the regulator must withdraw the authority to conduct business.

In developing this Handbook, a great deal of consideration was given to the assessment of risk in the review of a company license application. All of the current NAIC guidance provided to insurance department personnel relative to insurance company surveillance deals with the assessment of risk present in the individual insurers comprising the population to be regulated. That risk, the risk of financial failure or risk of marketplace improprieties is to be measured and graded. Current guidance defines procedures in such a manner that regulators maximize the effectiveness of the surveillance process by concentrating on the areas, or companies, of greatest risk. This approach by its nature, forgoes the idea of "zero" risk. The cost of obtaining zero risk is prohibitive and the effort expended in its pursuit is better spent in other endeavors.

Similarly, regulators involved in reviewing company licensing applications must adhere to the same goals. The review of the company licensing application should be structured so that applicants' risks of financial failure or marketplace impropriety are identified and addressed. Procedures exist in the *Financial Analysis Handbook*, the *Financial Condition Examiners Handbook* and the *Market Regulation Handbook* for monitoring companies subsequent to admission. Company licensing personnel should concentrate on those issues that indicate an applicant may harm the citizens of their state, either through financial failure or marketplace improprieties, as a result of granting or amending a certificate of authority.

Therefore, the procedures described herein represent a departure from the conventional approach to the review of a company license application. In some instances, it is recommended that documents submitted with an application should be subject to minimal review. Those documents, although necessary to establish an applicant as a legal entity, do not provide significant insight into the risk profile of a company. By accepting the risk of a minor compliance violation (that, after all, will still be the subject of ongoing monitoring), the regulator will maximize the effectiveness of their department and better fulfill their responsibilities to the citizens of their state.

*NAIC Company Licensing Best Practices Handbook*  
Interstate Communication

---

**Interstate Communication**

## NAIC *Company Licensing Best Practices Handbook* Interstate Communication

---

### INITIATING INTERSTATE COMMUNICATION

The expansion and/or alteration of a company's operations are of equal importance to the regulators in both the expansion states and the domestic state. The results of unsuccessful expansion plans cut across state boundaries — a troubled company is “troubled” in all states. It follows that the analysis of a company's condition and business plan should be accomplished through a coordinated effort. Ultimately, each state operates under its own statutory authority and is responsible for the protection of its own policyholders. Interstate communication and cooperation is not intended to relinquish the authority of any state or to disadvantage any state; rather, it is intended to facilitate efficiencies that will be achieved when applicant states coordinate the company licensing process with all states involved, including, most importantly, the domestic state.

The NAIC Financial Regulation Standards and Accreditation Program requires states to provide for the sharing of otherwise confidential information, administrative or judicial orders, or other action, with other state regulatory officials, provided that those officials are required under their law to maintain its confidentiality. The NAIC “Master Information Sharing and Confidentiality Agreement” allows signatory states to share confidential information with other signatory states. As of this writing, 50 states and the District of Columbia have signed the agreement. Current information can be accessed through the NAIC I-SITE application under StateNet or <https://i-site-state.naic.org/cgi-bin/statenet>.

Prior to submitting an application in a foreign state, the insurer should inform the state of domicile of its plans in the foreign state(s). If the state of domicile holds important concerns regarding the applicant's plans, such concerns should be communicated to the **lead reviewer** (senior financial regulator) in the applicant state(s). Similarly, after receipt and an initial review of an application, the applicant state may contact the **lead reviewer** (senior financial regulator) in the domiciliary state to open a dialogue regarding the applicant. Preferably, this communication should occur as early in the application process as possible to allow consideration of the information within an appropriate timeframe. The dialogue should include:

- Is the Applicant Company concurrently applying to additional states?
  - If so, contact other states to coordinate information available from the domiciliary state and discuss when determine if the group plans to enter multiple states/markets at the same time or in rapid succession.
  - If so, consider the Applicant Company's seasoning/experience and intent /ability to support both financially and operationally entry into multiple markets at one time.
    - Does the group have personnel to handle the premium volume, claims volume, and are its accounting systems adequate to support entities in multiple jurisdictions?
    - Is the group familiar with the different regulatory regimes in the states it is proposing to enter? For instance, are they aware of state law governing marketplace activity, such as marketing and sales, underwriting and rating, claims, etc.? Do they have processes in place for underwriting and rating, claims, and marketing and sales or are they working on those documents? Are they aware of the filing requirements for forms, rates, and rules?

## NAIC *Company Licensing Best Practices Handbook* Interstate Communication

- ~~o~~ The applicant state may want to touch base with the market conduct and filings section with the Department to consider if additional questions are needed, or if market conduct has any additional concerns with the Applicant.
- If so, and the applicant is part of a holding company structure, contact the “Lead State” to coordinate information sharing. Consider requesting the Group Profile Summary.
- ~~If the Applicant Company does~~ the majority of ~~its the Applicant Company’s~~ business in a state other than the domiciliary state, the ~~Applicant Company and domiciliary~~ states may consider ~~communication communicating~~ with a “Key State” as discussed below. However, even if a key state is identified, the domiciliary state will remain the primary regulator.
- Determine ~~If the Applicant Company understands the market it intends to enter and how it plans to compete with other, more established market participants. Are the projections provided with the application reasonable in light of the market competition in the state?~~
- Domiciliary (and key) state’s analysis of current condition of the applicant.
  - Has the domiciliary state performed a risk analysis of the applicant?
  - If the risk analysis performed by the domiciliary state is understandable to the applicant state and is substantially similar to the prioritization system defined in this Handbook, the applicant state should consider accepting the analysis in lieu of performing an additional financial analysis of the Applicant Company.
- Analysis of Business Plan by Applicant State(s)
  - Are the operations described in the business plan consistent with the demonstrated experience and expertise of the Applicant Company?
  - Does the business plan have the potential to significantly alter the condition of the Applicant Company?
  - After consideration of the Applicant Company’s condition, business plan and any other relevant information, has the domiciliary state transmitted any information having a bearing on the application?
  - For Health entities- ~~consideration of~~ determine the Applicant Company’s operational capabilities, include its ability to properly code for risk scoring ~~if Medicare line is provided, and its ability to develop and maintain an adequate provider network.~~
  - ~~Additional Review of the organizational structure and capital resources of the applicant.~~ Determine what funding is currently available to adequately support the growth of the Applicant company and the Group. Assess whether the Group may need to raise capital from investors to support the anticipated growth and the likelihood of the capital being timely raise raised timely. ~~to accommodate rapid changes in membership (up or down), including contingency plans if it fails to capture market share as intended.~~
  -

### LEAD STATE

Lead state(s) or designee assumes the role of coordinator and communication facilitator. The lead state(s) serves as the facilitator and central point of contact for purposes of gathering and distributing information to all regulators involved.

### KEY STATE

## NAIC *Company Licensing Best Practices Handbook*

### Interstate Communication

---

In some instances other states may have information pertinent to the application. In those instances, a “Key State” may be considered for consultation in addition to the domiciliary state. The Key State may emerge based on the state with the largest premium volume, the state of domicile of the parent of the holding company, or other reasons. The “Key State” should not assume the responsibilities of either the applicant state or the domiciliary state. A “Key State” should be identified solely as an additional source of information regarding the applicant.

#### COMMUNICATIONS AND THE DOMICILIARY STATE

As previously stated, the Applicant Company should inform the domiciliary state of its plans to file company licensing applications in foreign states. In addition, communications between the applicant state(s) and the insurer may contain information regarding specifics of the applicant state’s marketplace that may significantly impact the insurer’s proposed business plan. The use of the electronic UCAA provides a mechanism for tracking such correspondence [via the state-to-state communication link](#). This will allow the domiciliary state to remain cognizant of these communications and the relevant information, while the decision on the expansion remains with the expansion state.

~~This page intentionally left blank.~~

*NAIC Company Licensing Best Practices Handbook*  
**Best Practices: Conceptual Framework of Processes and Procedures**

---

**Best Practices: Conceptual Framework of Processes and Procedures**

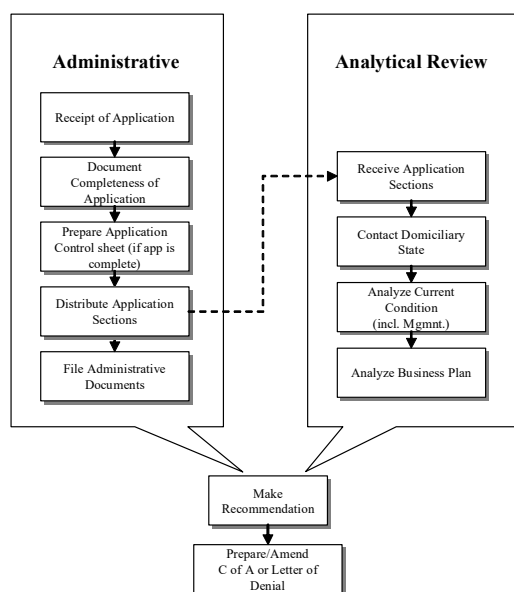
## NAIC *Company Licensing Best Practices Handbook* Best Practices: Conceptual Framework of Processes and Procedures

### CHAPTER OVERVIEW

This chapter will discuss a framework for the process flows that occur within the Company Licensing Function. The significant procedures within those process flows are discussed in detail, although guidance on the review of specific UCAA forms is contained in the “Best Practices: Application Review” chapter.

### COMPONENTS OF THE COMPANY LICENSING FUNCTION

Depending on the type of application, the processing of a company license application can be broken down into one or more of the following components as shown in the graphic below.



#### Administrative

**Coordination:** This component begins with the receipt (accepting as complete) and recording of an application (task assignment) and its supporting documentation. The application should be reviewed to determine that a response exists for all inquiries (via the application notes section). Supporting documents should then be reviewed to determine that they are, in fact, responsive to the UCAA requirement. The degree of ~~the~~ completeness and/or responsiveness of the application must be assessed to determine if processing of the application can proceed without further input from the Applicant Company. It is recommended that the state acknowledge and accept the application as complete and document notes in the appropriate sections of the application for future



## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Conceptual Framework of Processes and Procedures

---

~~reference by the application reviewer. issue a letter to the Applicant Company acknowledging receipt of the application.~~

**Timeliness:** If processing can commence, ~~the facilitator~~ (an “application coordinator”) should ~~create a task or upload a state specific checklist, employ a spreadsheet, database, TeamMate file, or other mechanism (if the application was not received via the NAIC electronic UCAA utility)~~ to record the assignment of application review responsibilities and the progress of the review against the Department or UCAA timelines:

- The Department should have a policy that establishes timing requirements for the review of applications for primary licensure of new companies and redomestications and Form A filings. If not, then the following guidelines are acceptable.
- Fourteen days to review an application for completeness.
- The goal is to notify the Applicant Company of supplemental information required from the Applicant Company within 30 days of applications. However, there may be situations where supplemental information provided requires clarification or a second review of the application requires requesting additional information.
- It should be noted, if additional information is needed to complete the review of an application, the review may also take longer to complete. Once a request for additional information has been made, the 60-day or 90-day goal is suspended until the requested information is received.
- Ninety days to process a primary application. Effective January 1, 2012, company licensing will be part of the accreditation program, Part D of the NAIC Policy Statement on Financial Regulation Standards, which provides that if a state does not have timing requirements in statute or regulation, the state will be expected to meet the 90-day goal for accreditation purposes.
- Sixty days to process all other types of applications.

It is recommended that the state send the company regular correspondence (Request for Information- RFI) regarding the progress of the application.

**Administrative Filing:** This component consists of the review and filing of administrative documentation, which, while critical to the establishment of the Applicant Company as an operating business organization, is generally not subject to substantial qualitative analysis. This includes receipt of filing fees, articles of incorporation and bylaws, statutory deposits, membership in mandatory associations, consent to service of process, as well as other state-specific requirements. (See discussion of specific forms in “Best Practices: Application Review” chapter.)

#### Analytical Review

**Analysis of Current Condition:** The financial condition and management practices of the Applicant Company must be ascertained to determine they are of sufficient quality to permit the applicant to sell insurance products to the citizens of the state.

Except for a primary application, the analysis of the Applicant Company’s current condition should begin with contact to the domiciliary (and key) state as described in the “Interstate

## NAIC *Company Licensing Best Practices Handbook* Best Practices: Conceptual Framework of Processes and Procedures

Communications” chapter. Company licensing analysts should confer with financial analysts in the domiciliary (and key) state to determine the overall operating condition of the Applicant Company based on a prioritization system and plan the scope of review activities accordingly. [The reviewer can communicate via the state-to-state communication link within the application.](#)

### **Prioritization Framework**

The utilization of a prioritization framework is the key to the efficient analysis of an Applicant Company’s current condition. *The Financial Analysis Handbook* suggests that domestic insurers be “prioritized” or ranked according to each insurer’s “relative stability.”

The *Financial Analysis Handbook* provides general guidance regarding the framework, but leaves the determination of specific prioritization metrics up to the domiciliary state. Tools currently available for use in reviewing the financial condition include: Insurance Regulatory Information System (IRIS) ratios, ~~Analyst Team System results~~ and Financial Analysis Solvency Tools (FAST). In addition to the financial review, any market conduct information available from the market analysis chief or collaborative action designee in the state’s market analysis department should be considered along with data available in the following market analysis tools and systems that are available on I-SITE: Complaints Database System (CDS), Examination Tracking System (ETS), Market Analysis Profile (MAP), Market Analysis Review System (MARS), Market Initiative Tracking System (MITS), Regulatory Information Retrieval System (RIRS), Market Conduct Annual Statement (MCAS), Producer Database (PDB), and 1033 State Decision Repository (SDR)-Data Entry Tool. The analyst should note any unusual items that translate into financial risks or indicate further review or communication is needed with the insurance department’s market analysis staff.

Commented [DD1]: ATS scores are no longer available.

Other initiatives have been undertaken to more specifically define a broad-based system of prioritizing insurers based on operational practices as well as financial condition. During the development of this Handbook, it was noted that several states have developed such holistic models. The use of these models is clearly the best practice for determining the current overall condition of an insurer, and then assigning a prioritization that can be used to determine the appropriate scope of analytical review for a specific application. However, in each case, the specifics of the model are considered confidential.

Therefore, for the purpose of this Handbook, a prioritization framework will be discussed, and the general characteristics of each prioritization category will be described.

### **Use of Prioritization Framework in Application Review**

The use of prioritization in the application review process carries the same risks and benefits inherent in any prioritization evaluation system. The goal of all such systems are to eschew the costly practice of reducing risk to zero, and instead to define a level of acceptable risk. The use of prioritization means that, in some instances, all the documents included with an application will not be reviewed in detail. However, the risk of not reviewing those documents in detail is mitigated by a company’s low risk of financial failure and by providing additional time to review the company’s business plan.

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Conceptual Framework of Processes and Procedures

---

During the development of this Handbook, almost all company licensing personnel interviewed indicated that they were able to quickly, even if only informally, identify companies whose applications were likely to be approved. States that utilized prioritization systems were able to more formally document those applicants. Through the use of a formal prioritization system, company licensing analysts can reduce the scope of their review of strong applicants, thus conserving effort better served in the review of marginal applicants. The following guidance provides a recommended scope of review for each prioritization category.

#### Priority 1

Insurers included in Priority 1 are considered troubled and subject to comprehensive annual and quarterly analysis procedures, detailed considerations outlined with the *Troubled Insurance Company Handbook*, and a significantly elevated level of ongoing regulatory monitoring and oversight. Upon designating an insurer as a Priority 1, the domestic state should follow required procedures for troubled companies in communicating with other state insurance regulators. Insurers prioritized at this level would also be considered priority insurers for accreditation timeliness purposes and should generally be analyzed ahead of Priority 2, Priority 3, and Priority 4 insurers.

Insurers in this group generally are not capable of withstanding even moderate business fluctuations. There may be significant noncompliance with laws and regulations. Risk-management practices are generally unacceptable relative to the insurer's size, complexity and risk profile. Corporate and group structures or framework may be of a nature that is not conducive to effective regulation. Close regulatory attention is required, which means formal action is necessary in most cases to address the problems. Insurers in this group pose a risk to the state guaranty fund. Failure of the insurer is probable if the problems and weaknesses are not satisfactorily addressed and resolved. Priority 1 companies should not be considered for expansion.

#### Priority 2

Insurers in Priority 2 are – high-priority insurers that are not yet considered troubled but may become so if recent trends or unfavorable metrics are not addressed. High-priority insurers may also include those subject to heightened monitoring for reasons other than financial solvency risks, as determined by the department. Insurers prioritized at this level may be subject to full quarterly analysis procedures and are subject to comprehensive annual analysis and an elevated level of ongoing regulatory monitoring and oversight. Insurers prioritized at this level would also be considered priority insurers for accreditation timeliness purposes and should generally be analyzed ahead of Priority 3 and Priority 4 insurers.

Priority 2 companies are generally not considered good candidates for expansion. However, senior-level department personnel should contact their counterparts in the domiciliary state to determine if there is any reason to perform further analysis in consideration of approval of the application. In certain unique circumstances, based on the line of business offered and the market conditions in the expansion state, it may be appropriate to pursue licensure under heavily monitored criteria.

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Conceptual Framework of Processes and Procedures

---

These insurers, or their holding company groups, have a combination of moderate to severe weaknesses that may exhibit unsafe and unsound practices or conditions. The insurer is moving toward meeting criteria indicative that it is operating in a manner that is financially hazardous to policyholders and/or the public. They have serious financial or managerial deficiencies that result in unsatisfactory performance and problems are not being satisfactorily addressed or resolved by the board of directors and management.

#### Priority 3

Insurers in Priority 3 are considered moderate priority insurers that indicate some need for additional monitoring. Insurers prioritized at this level should be subject to comprehensive annual analysis procedures, should generally be analyzed ahead of Priority 4 insurers, and may be subject to an enhanced level of ongoing regulatory monitoring and oversight.

Priority 3 companies present the greatest challenge to the company licensing analyst. They are neither an obvious candidate for approval nor for denial, based on their current overall condition. Insurers in Priority 3 appear fundamentally sound, but may exhibit some degree of regulatory concern in one or more areas. These insurers and their parent and other members of the holding company group are relatively stable, could withstand moderate business fluctuations, and are in substantial compliance with laws and regulations. While the overall, risk-management practices are satisfactory relative to the insurer's size, complexity, and risk profile, these companies exhibit certain notable adverse risk characteristics. There are no current material supervisory concerns and, as a result, the regulatory response is informal and limited. The risk to policyholders and/or guaranty funds is currently viewed as remote, however significant factors exist that may result in financial stress in the longer term.

In this instance the company licensing analyst should re-analyze the financial information provided with the application in order to better understand the exact nature of the Applicant Company's weaknesses. However, it is important that communication between senior-level department personnel in the domiciliary (and key) state remains active. The domiciliary state can provide insight into the resolution of adverse financial or market conduct examination findings and the extent to which the company has remediated the deficiencies. Once the analyst has gained comfort with his/her knowledge of the Applicant Company's current operational condition, the business plan should be diligently reviewed in order to determine whether:

- The Applicant Company has a demonstrated history (e.g., five years) with the lines of business for which it is applying.
  - If the Applicant Company is applying for lines of business for which it has less than five years of history, the analyst should review the business plan to identify, and/or request additional information regarding, key managerial personnel responsible for administering the new lines of business.
- Key personnel have been in place for a sufficient period of time to demonstrate their insurance management expertise.
- The scope of the expanded operations is not imprudent relative to the financial strength of the Applicant Company, its parent and other members of the holding company group. If the expanded operations are in new lines of business, more stringent standards should be applied

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Conceptual Framework of Processes and Procedures

---

when assessing the potential effect of expanded operations on the condition of the Applicant Company.

- The domiciliary state noted any operational or compliance deficiencies in lines of business similar to those planned for the expanded operations.

#### Priority 4

Priority 4 are lower priority insurers that do not currently indicate a need for additional monitoring. These insurers should be subject to a basic level of regulatory monitoring and oversight, including annual analysis.

For these companies, the analysts should consider foregoing an in-depth review of information relevant to the Applicant Company's current operating condition (e.g., financial documents included with public records package or the holding company statements). Rather, the company licensing analyst should focus on the quality and assumptions of the business plan to determine whether:

- The Applicant Company has a demonstrated history (e.g., three years) with the lines of business for which it is applying.
  - If the Applicant Company is applying for lines of business for which it has less than three years of history, the analyst should review the business plan to identify, and/or request additional information regarding, key managerial personnel responsible for administering the new lines of business.
- Key personnel have been in place for a sufficient period of time to demonstrate their insurance management expertise.
- The scope of the expanded operations is not imprudent relative to the financial strength of the company and its parent and other members of the holding company group.

#### **Analysis of Business Plan**

The Applicant Company's plan for conducting business in new jurisdictions must be evaluated to determine if the plan is consistent with the Applicant Company's demonstrated capabilities and the state's marketplace. Further guidance for the analysis of business plans is included in the "Best Practices: Application Review" chapter.

#### **Intradepartmental Communications**

In addition to communications with other jurisdictions, it is important that the company licensing coordinator convey information regarding pending applications to other divisions within the insurance department. The licensing of a new entity or expansion of authority will impact other divisions once the new or amended certificate of authority is issued.

**Actuarial:** This section should understand the business plan filed with an application in order to adequately monitor any future reserving issues or other actuarial concerns.

**Financial Analysis:** Once a new or amended certificate of authority has been issued the financial analysis division of the insurance department will assume monitoring responsibilities. The

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Conceptual Framework of Processes and Procedures

---

financial analysis section should understand the business plan filed with an application in order to monitor future results against that plan.

Market Conduct and/or Analysis (including consumer complaints and enforcement): The Market Conduct/Analysis section should understand the business plan to anticipate any issues and to monitor future results against the plan.

Policy Approval: Although policy forms are not a required component of the company license application, they are one of the most significant indicators of an Applicant Company's actual business intentions. The financial analysis section should coordinate with the policy approval section to monitor policy filings from the newly licensed company to determine that they are consistent with the filed business plan.

Producer Licensing: Similar to policy approval, the appointment of producers must be consistent with the scope of the new company's business plan. The financial analysis section should similarly coordinate with the producer licensing section to monitor producer appointments by the new company.

#### **Timeliness of Review**

Perhaps no issue surrounding the company licensing process creates greater interest than that of timeliness. The UCAA website contains suggested guidance for the processing of various types of applications, including interim timelines. Although regulators should not sacrifice an appropriate level of review solely in the pursuit of expediency, it is imperative that every effort be made to adhere to the processing times recommended on the *UCAA website* when reviewing Priority 4 companies:

- Fourteen days to review an application for completeness.
- The goal is to notify the company of supplemental information required from the applicant within 30 days of applications. However, there may be situations where supplemental information provided requires clarification or a second review of the application requires requesting additional information.
- It should be noted, if additional information is needed to complete the review of an application, the review may also take longer to complete. Once a request for additional information has been made, the 60-day or 90-day goal is suspended until the requested information is received.
- Ninety days to process a primary application.
- Sixty days to process all other types of applications.
- Complexities involved with the review of Priority 2 and Priority 3 companies may adversely affect a state's ability to meet these timelines recommendations. Notwithstanding these complexities, the regulator should make all reasonable efforts to maintain timely communication with the applicant companies.

*NAIC Company Licensing Best Practices Handbook*  
**Best Practices: Application Review**

---

**Best Practices: Application Review**

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

---

#### Introduction

In this chapter, recommendations for the review of each type of application are presented. The recommendations are based on the concepts of prioritization framework and interstate communications presented in the previous sections of this Handbook.

Within each application type, the review recommendations are presented in the following format:

- Application Type:
  - Chart Illustrating the UCAA sections of the application.
  - Recommendations for reviewing the “Administrative Filings” sections of an application.
  - Recommendations for reviewing the “Analysis of Current Condition” sections of an application.
    - Depending on the type of application, there may be subsections based on the risk profile of the Applicant Company.
  - Recommendations for reviewing the “Analysis of Business Plan” sections of an application.
    - Depending on the type of application, there may be subsections based on the risk profile of the Applicant Company.

#### Confidentiality and Safeguarding of Biographical Affidavit Information

The insurance department shall implement a written information security program that includes administrative, technical, and physical safeguards to protect the security and confidentiality of the biographical affidavit, fingerprint card (where applicable), independent third-party background report, and all associated notes, emails or work papers (collectively referred to hereafter as “documents or records”).

Given: (i) the size and complexity of the insurance department and the nature and scope of its activities; (ii) the variations in state laws; and (iii) the sensitive and personal information it maintains, the insurance department is referred to the NAIC *Standards for Safeguarding Customer Information Model Regulation* (#673) for further guidance with respect to an information security program. In addition, the insurance department should be aware that there may be other state-specific and federal laws and regulations regarding record retention and confidentiality, including the federal Fair Credit Reporting Act and the Federal Trade Commission regulations.

The following actions and procedures are recommended to the insurance department in implementing a written information security program.

#### Administrative Safeguards

- Identify reasonably foreseeable internal or external threats, assess the risk of harm from these threats, and develop and implement written procedures and policies that will safeguard the information and minimize the threats.
  - Annually assess the sufficiency of current practices and adjust the written program as necessary to adapt to new threats and technologies.
  - Train employees on the policies and procedures developed to safeguard documents or records
-



## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

---

and personal information contained therein. Periodically review the training process and refresh employees on old and new processes. Provide training and training materials relevant to the safeguards to employees outside the company licensing division that may handle a public records request for the documents or records. Educate employees on any state enforcement rules and/or policies regarding their failure to abide by the training they receive.

- Develop procedures to search for Social Security numbers imbedded in licensure or registration numbers provided. Licenses or registrations from prior years may have included Social Security numbers within the number.
- Develop procedures and policies specific to the security of laptops and other portable devices that may contain personal information from the documents or records.
- Prohibit the sale of personal information, including names and addresses of any affiant for any purpose.
- Exercise appropriate due diligence in selecting service providers, and require thorough appropriate confidentiality agreements, that they implement measures to meet the relevant objectives of the security program.

### Technical Safeguards

- Maintain personal information in a secure manner that is appropriate to the size and complexity of the insurance department and the nature and scope of its activities.
- Transmit documents or records and personal information between the third-party vendor and insurance department in a secure manner.

### Physical Safeguards

- Develop policies and procedures to address retention and destruction of paper and electronic documents or records.
  - Place access controls to the documents or records, whether in paper or electronic form, only to those individuals that need to know the information contained therein to complete a company's review for licensure or to investigate a response to an open records or Freedom of Information Act (FOIA) request.
  - Keep the documents or records out of public view and secure when not being utilized.
  - Maintain and secure all electronic and paper documents or records in accordance with state laws or record retention policies. The insurance department must comply with its written information security program when responding to the public records request for biographical information that is outdated or for which the authorization has been revoked by the affiant. In addition, the Department should include a statement with the documents that notifies the individual requesting disclosure through a public records request that the information contained therein may be outdated. (According to the UCAA Instructions, a biographical affidavit is only good
-

*NAIC Company Licensing Best Practices Handbook***Best Practices: Application Review**

---

for 6 months after executed, and an affiant may revoke authorization at any time.)

- Destroy documents or records in a manner that renders the information unreadable and undecipherable; document and maintain those procedures for secure disposal of Nonpublic information.
- Develop standards for notifying the affiant and affiant's employer in the event of a security breach.
- Store the electronic and hardcopies of these documents or records in a secure manner. (Examples include storage in a cabinet or room accessible only by individuals that need the information for permitted purposes.)

For the states that have enacted the *NAIC Insurance Data Security Model Law* (#668) refer to the guidance provided in the *Financial Examiners Handbook*.

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

#### Primary Application

A Primary Application is to be used for domestic insurers. See Appendix A for the Primary Application Review Checklist.

The classification of the application instruction items is illustrated in the following chart:

Application Instruction Items	Administrative Filing	Analysis of Current Condition	Analysis of Business Plan
1. <a href="#">Application Form and Attachments</a>	☒		
2. <a href="#">Filing Fee</a>	☒		
3. <a href="#">Minimum Capital and Surplus Requirements</a>		☒	
4. <a href="#">Statutory Deposit Requirements</a>	☒		
5. <a href="#">Name Approval</a>	☒		
6. <a href="#">Plan of Operation</a>			☒
7. <a href="#">Holding Company Act Filings</a>		☒	
8. <a href="#">Statutory Memberships</a>	☒		
9. <a href="#">SEC Filings or Consolidated GAAP Financial Statement</a>		☒	
10. <a href="#">Debt-to-Equity Ratio Statement</a>		☒	
11. <a href="#">Custody Agreements</a>			☒
12. <a href="#">Public Records Package</a>	☒		
13. <a href="#">NAIC Biographical Affidavits</a>		☒	

#### Administrative Filing

#### Application Instruction Items

##### Item 1. Application Form and Attachments

- Form 1P “Checklist” – The coordinator should review the checklist for completeness and that all described documents are included in the application.
- Form 2P “Primary Application” – The coordinator should review the form for completeness.
- Form 3 “Lines of Insurance” – Only the applied for lines will be required for a newly formed company. The entire Form 3 will be required for a redomestication.

##### Item 2. Filing Fee

- Review check submitted in payment of fees for correct amount. In some instances, the check may be held by another section of the insurance department. In that case, review the description of the check received.
- Forward check for deposit or provide information for proper processing of check.
- Filing fees range from \$0 to in excess of \$5,000 and are generally retaliatory.

##### Item 4. Statutory Deposit Requirements

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

---

- Form 7 “Certificate of Deposit” – The coordinator should review the form and compare the amount of the deposit to the state’s requirement.
- These funds are deposited with the commissioner, generally through a safekeeping or trust receipt, to be held for the benefit and protection of, and as security for, all policyholders and, in some instances, creditors of the insurer making the deposit. Additional deposits are generally required of those insurers applying to write lines of business not covered under state insurance guaranty funds (e.g., guaranty, fidelity, surety, and bond business) or otherwise (e.g., workers’ compensation). The ultimate purpose of these funds is to ensure that liquid assets are unencumbered and available for use by the commissioner, or his/her designee, for the administration of the insurer’s estate should it become insolvent.

#### Item 5. Name Approval

- The coordinator should determine that a name approval request consistent with the state’s requirements has been filed. If state requirements dictate, the request should be forwarded to the appropriate area for processing.
- Typically, state insurance departments incorporate insurers, but some states require the involvement of the secretary of state or the attorney general. Names are submitted for preapproval because the public has the right to know with whom it is dealing and, therefore, someone must determine that the name is not so similar to another as to be likely to deceive or mislead. The name should be such as to show that the company is engaged in the insurance business and preferably to show the type of business. Some states provide for publication and subsequent hearing to ensure that any objections are addressed.

#### Item 8. Statutory Memberships

- The coordinator should compare the application to the state requirements for statutory memberships and determine that appropriate documentation supporting the membership application is included.
- Some states require a positive application and confirmation regarding membership in state-mandated risk pools or other organizations. In other words, an insurer may not automatically be a member by virtue of its certificate of authority, but may be required to join outside the jurisdiction of the insurance department.

#### Item 12. Public Records Package

- The coordinator should compare the contents of the public records package with state requirements. Financial documents should be forwarded to the areas expected to utilize the documents. Operational documents (other than the application form) should be filed as required.

## NAIC Company Licensing Best Practices Handbook

### Best Practices: Application Review

---

#### Analysis of Current Condition

*Note: Generally, the scope of the analysis of current condition would depend on the prioritization of the Applicant Company. With a primary application (not a redomestication):*

- i. *If it is a stand-alone company, there is no information upon which to establish a prioritization and the use of that technique is inapplicable.*
- ii. *However, if the Applicant Company is part of a holding company structure, the reviewer may want to consider the strengths, structure, ratings, etc. of the holding company.*

#### **Application Instruction Items**

##### Item 3. Minimum Capital and Surplus Requirements

- This document should make it clear that the Applicant Company understands state law with respect to the amount of capital and surplus that must be maintained at a minimum. In some states, the minimum capital and surplus requirements are determined by the classes of insurance that the applicant is requesting authority to transact and the classes of insurance the applicant is authorized to transact in all other jurisdictions. The analyst should determine the level of surplus required after considering the Applicant Company's plan of operation. Compliance with the statutorily prescribed minimum surplus requirement may not be sufficient for all applicants.

##### Item 7. Holding Company Act Filings

If the Applicant Company is a member of a holding company system, the application must include either the most recent Holding Company Act (HCA) filings, including the annual Form B registration statement and related Form F, or a statement substantially similar to the *Insurance Holding Company System Regulatory Act* (#440). Holding Company Act filing information should be considered to determine the role of the Applicant Company within the holding company structure, enterprise risk, the financial capacity of the parent to support an insurance operation and the existence of relevant insurance operations experience in the proposed parent or affiliates. Affiliates are identified along with a description of any transactions between the insurer and an affiliate currently outstanding or during the last calendar year. Copies of all advisory, management and service agreements and other attachments need be reviewed for fair and equitable terms. Refer to the Form A Review Best Practices located under Appendix D.

- The applicant state should bear in mind that Holding Company Act filings, including the Holding Company Form F, are highly confidential, but that state laws providing confidentiality protections may vary from those of the applicant state. A state that has not enacted language specified under HCA Item 8 in its entirety will not have the same confidentiality protections afforded in a state where the language has been enacted. State confidentiality statutes applicable to HCA filings should be reviewed by Regulators of each state before any information is exchanged and where an apparent inconsistency is noted, the state's legal division should be contacted. Regulators should treat all such materials with the highest level of protections afforded by any relevant state, in order to preserve the confidentiality of such materials and to encourage candor and openness in company discussions and disclosures.

##### Item 9. SEC Filings or Consolidated GAAP Financial Statement

---

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

---

- If the Applicant Company, its parent or its ultimate holding company has made a filing or registration with the U.S. Securities and Exchange Commission (SEC) in connection with a public offering within the past three years, or filed an 8K, 10K or 10Q within the past 12 months, the filing, including any supplements or amendments, is available electronically from the SEC. If the applicant, its parent or its ultimate holding company is not publicly traded, the application must include a copy of the Applicant Company's most recent consolidated generally accepted accounting principles (GAAP) financial statement.
- Similar to the Holding Company Act filings, these filings will provide insight into the financial capacity of the parent to support an insurance operation and the existence of relevant insurance operations experience in the proposed parent or affiliates, as well as information regarding control, enterprise risk, and corporate governance.

#### Item 10. Debt-to-Equity Ratio Statement

- The debt-to-equity ratio statement should be reviewed to determine the debt service burden that is likely to be placed upon the Applicant Company. Debt service should only be provided through earnings not needed by the insurer to service its own operations.

#### Item 13. NAIC Biographical Affidavits

- These documents are used to perform a background check (if required by the state) to evaluate the suitability, competency, character and integrity of those persons ultimately responsible for the operations of the insurer. Persons to be reviewed are the controlling owners, officers, directors and key managerial personnel with the ultimate authority over the financial and operational decisions of the insurer, such as the chief executive officer (CEO), chief operating officer (COO), chief financial officer (CFO), secretary, chief marketing officer and treasurer.
- Independent third-party background reports are used to identify discrepancies in the biographical affidavit and evaluate the suitability of the controlling owners, officers, directors or key managerial personnel of the Applicant Company and competency to perform the responsibilities of the position held with the company. Issues regarding competency, character and integrity may be self-evident from the information provided in the affidavit or may be determined from the related background review or criminal background check.
  - Regulators will review the biographical affidavit for completeness – each question should have a response. The affiant must use the most current form available and posted on the UCAA website. Insufficient affidavits or affidavits where signature dates are more than six months from the application submit date should not be accepted.
  - Regulators will review the comparison of information provided on the biographical affidavit and the results of the independent third-party background reports.
  - Regulators will note any discrepancies found in the independent third-party background reports and follow up with the Applicant Company.
  - Any key concerns will be addressed with the Applicant Company.

Fingerprint data, if available, can be used to validate the identity of personnel and check for criminal background. Information in the biographical affidavit can then be utilized to verify employment and educational background.

## NAIC Company Licensing Best Practices Handbook

### Best Practices: Application Review

---

#### Analysis of Business Plan

*Note: Generally, the scope of the analysis of current condition would depend on the prioritization of the Applicant Company. With a primary application (not a redomestication):*

- i. *If it is a stand-alone company, there is no information upon which to establish a prioritization and the use of that technique is inapplicable.*
- ii. *However, if the Applicant Company is part of a holding company structure, the reviewer may want to consider the strengths, structure, ratings, etc. of the holding company.*

#### **Application Instruction Items**

##### Item 6. Plan of Operation

- Business plans are written descriptions of expected market conditions, company operations, and related forecasted financial results. The plan of operation section of the UCAA refers to three components: a brief narrative, proforma financial statements/projections and a completed questionnaire (Form 8).
- Overly rapid growth in premium volume, inappropriate pricing, inappropriate underwriting, and product mix are important areas of concern when reviewing a business plan.
- The pricing of insurance products is a difficult task. The premium is established based on estimates of a number of unknown future events. The effects of a failure to accurately estimate the cost of those events or to provide a sufficient margin for adverse deviation from the estimate may not be apparent for a long time. The types of business written by an insurer affect the ability of the insurer to estimate future costs. Certain lines of business are, by their nature, more volatile than others in claim cost experience. Also, the long-tail nature of some lines of business increases the level of uncertainty in estimating future costs. Setting premium rates solely on the basis of rates charged by competitors, without consideration for possible differences in the quality of the business that the insurer and its competitors are writing, should be a concern. The description of pricing should indicate the coordination between the Applicant Company's actuarial and underwriting and marketing departments.
- The proforma financials should be reviewed for consistency with the stated business plan and reasonableness with respect to assumptions. Projections should be based upon well-described and defensible assumptions that are attainable under the circumstances described in the business plan. The department should consider a review of the business plan and proforma financials by department actuaries and/or other experts.
- The insurance department should consider obtaining a pledge from the Applicant Company to notify the insurance department if any deviations from the filed plan of operation are initiated by the Applicant Company within three years of admission.

## NAIC *Company Licensing Best Practices Handbook*

### Best Practices: Application Review

- **For Health entities:**
  - Determine the Applicant Company's operational capabilities, include its ability to properly code for risk scoring, and its ability to develop and maintain an adequate provider network.
  - Review the organizational structure and capital resources of the applicant.
    - ◆ Determine what funding is currently available to adequately support the growth of the Applicant company.
    - ◆ Do they have capital adequate to accommodate rapid changes in membership (up or down), including contingency plans if it fails to capture market share as intended.
    - ◆ Assess whether the Company may need to raise capital from investors to support the anticipated growth and the likelihood of the capital being raised timely
  - Determine the Applicant Company's seasoning/experience and intent /ability to support both financially and operationally entry into a new market.
  - Determine if the Applicant Company understands the market it intends to enter and how it plans to compete with other, more established market participants.
    - ◆ Are the projections provided with the application reasonable in light of the market competition in the state?

### Best Practices – Review of Plan of Operations (Proforma Financial Statements, Narrative/ Business Plan and Questionnaire)

The depth of the review will depend on the complexity and financial strength as well as known risks of the insurer(s). Therefore, the analyst may consider a tailored set of procedures that addresses the specific risks of the insurer(s). The following best practices are presented as a guide for regulatory review and analysis of the plan of operations and financial projections related to UCAA primary and expansion applications, recognizing that this is not an all-inclusive list and not all items on this list will apply to each and every application. This list is intended to be a regulatory tool only. The analyst may find it useful to utilize the *Financial Analysis Handbook* in conjunction to this checklist during their financial review.

#### 1. Background Analysis

- Request the Applicant Company's Insurer Profile Summary (IPS) from the lead state. Upon receipt and review of the IPS, document your findings related to the following:
  - State's Priority Designation
  - Scoring System Result
  - IRIS Ratio Result
  - Analyst Team System Validation Level
  - RBC Ratio
  - Trend Test
  - Review any material issues or concerns of prospective risks noted in the IPS
  - Review the Applicant Company's most recent Annual Financial Statement, General Interrogatories, Part 1:
    - #5.1 and #5.2 in order to ascertain if the insurer has been a party to a merger or consolidation; and #6.1 and #6.2 in order to ascertain if the



## National Treatment and Coordination (E) Working Group

### Company Licensing Proposal Form

<p style="text-align: right;"><b>DATE:</b> <u>10/130/24</u></p> <p><b>CONTACT PERSON:</b> <u>Jane Barr</u></p> <p><b>TELEPHONE:</b> <u>816-783-8413</u></p> <p><b>EMAIL ADDRESS:</b> <u>jbarr@naic.org</u></p> <p><b>ON BEHALF OF:</b></p> <p><b>NAME:</b> <b>National Treatment and Coordination (E)</b> <b>Working Group</b></p>	<p style="text-align: center;"><b><u>FOR NAIC USE ONLY</u></b></p> <p>Agenda Item # <u>2024-07</u></p> <p>Year <u>2024</u></p> <p style="text-align: center;"><b><u>DISPOSITION</u></b></p> <p>[ ] ADOPTED</p> <p>[ ] REJECTED</p> <p>[ ] DEFERRED TO</p> <p>[ ] REFERRED TO OTHER NAIC GROUP</p> <p>[ X ] EXPOSED</p> <p>[ ] OTHER (SPECIFY)</p>
--	---

#### IDENTIFICATION OF SOURCE AND FORM(S)/INSTRUCTIONS TO BE CHANGED

[ ] UCAA Forms    [ X ] UCAA Instructions    [ ] Enhancement to the Electronic Application Process  
 [ ] Company Licensing Best Practices HB

Forms:

[ ] Form 2 - Application    [ ] Form 3 – Lines of Business    [ ] Form 4 – Management Information  
 [ ] Form 5 – Debt to Equity Ratio    [ ] Form 8M – Main Questionnaire    [ ] Form 8HC- Holding Company Questionnaire  
 [ ] Form 8L – Life Questionnaire    [ ] Form 11-Biographical Affidavit  
 [ ] Form 12-Uniform Consent to Service of Process    [ ] Form 13- ProForma    [ ] Form 14- Change of Address/Contact Notification    [ ] Form 15 – Affidavit of Lost C of A  
 [ ] Form 16 – Voluntary Dissolution    [ ] Form 17 – Statement of Withdrawal

#### DESCRIPTION OF CHANGE(S)

Edits to the Expansion application instructions to include the new electronic processes and to include a User Guide under Section III How to File.

#### REASON OR JUSTIFICATION FOR CHANGE \*\*

The expansion applications instructions were modified to include electronic processes and to add a User Guide on How to file. Changes are highlighted in yellow.

#### Additional Staff Comments:

\*\* This section must be completed on all forms.

Revised 08-2023

## Step One: Filing the Application

The Applicant Company may submit an Expansion Application anytime during the year. States will review the Expansion Application to ensure that the Applicant Company submits the application in the required format as outlined in these instructions.

Generally, within two weeks from the date the state receives the application, the state will notify the Applicant Company whether the state has accepted the application for filing. When the state accepts the application for filing, that becomes the official filing date.

The state will contact the Applicant Company via a Request for Information (RFI) if it does not accept the application due to a deficiency in the application's format. Depending upon the nature of the deficiency, the state may give the Applicant Company two weeks from the date of receipt of notification to correct the deficiency. Some states may not accept the applications that are deficient and request that the Applicant Company withdraw their application.

## Step Two: Application Review

An Expansion Application will undergo a rigorous financial and operational review in each state to which the Applicant Company submits the application.

At the conclusion of each state's substantive review, the state will grant the Applicant Company a Certificate of Authority or will request the Applicant Company to withdraw the application if a certificate of authority will not be authorized. Each state independently reaches a decision to either approve or deny an Expansion Application. It is entirely possible that some states might approve an Expansion Application and other states might deny the application.

If any state denies the application, that state will notify the Applicant Company and provide a detailed explanation for the denial. After the denial, if the Applicant Company wishes to re-file an Expansion Application, the state will require a new application and filing fee.

When the state has denied or asked the Applicant Company to withdraw the electronic expansion application, the Applicant Company has 30 days to withdraw their application or an automatic withdraw will be automatically generated.

Since only established companies can use an Expansion Application, the states assume that the Applicant Company has a basic understanding of the Certificate of Authority review process. Please refer to the [Primary Application](#) or the [Company Licensing Best Practices Handbook](#) for a more detailed explanation of the process. The Applicant Company is strongly encouraged to review the [state charts](#), and [FAQs](#) prior to contacting the states with questions before submitting an application for review.

## II. Filing Requirements

This section provides a guide to understanding the focus of each document of the Expansion Application. However, there typically are multiple purposes for the documents. Therefore, it is important that applications be complete.

**All documents submitted in support of the application must be current. However, in certain instances, some states have limited latitude to accept older documents, although generally**

**no more than five (5) years old. Please [contact the states individually](#) if there are questions about a specific document.**

All forms required are provided in the electronic Expansion Application.

### **Application Form and Attachments**

The application must identify all lines of insurance ([Form 3](#)) the Applicant Company is currently licensed to transact and all lines of insurance the Applicant Company is requesting authority to transact, as identified by the Applicant Company's plan of operation. The Applicant Company must be authorized in their domiciliary state for the lines of business requested in the application. A cover letter may be included as a component of the application. The Applicant Company should review the [Seasoning Requirements chart](#) for each state where the company plans to expand.

### **Form 3 Line of Business Matrix**

#### **[LOB Matrix](#)**

#### **Filing Fee**

Include a filing fee for each application state. The payee name and the instructions for submitting the filing fee are included in the [Foreign - Filing Fees](#) chart. Please note that due to [retaliatory statutes](#), the ultimate amount of fees in any state may be more than the amount indicated in the chart. Submit the filing fee in accordance with the state's preference and attach a copy of the payment invoice or receipt in the jurisdiction attachments. Each application jurisdiction should have a filing fee document attached, and the file name should include the state abbreviation.

### **Minimum Capital and Surplus Requirements**

The application must show that the Applicant Company meets each state's statutory minimum capital and surplus requirements. In some states, the minimum capital and surplus requirements are determined by the classes of insurance that the Applicant Company is requesting authority to transact and the classes of insurance the Applicant Company is authorized to transact in all other jurisdictions. The state will determine the level of surplus required after considering the Applicant Company's product line, operating record and financial condition. Compliance with the statutorily prescribed minimum surplus requirement may not be sufficient for all applicants. The [Minimum Capital and Surplus Requirements](#) chart identifies the minimum capital and surplus requirements for each Uniform State. The chart also provides a contact person or a link to a state-specific format or RBC requirements and instructions. [An explanation of the Applicant Company's compliance with the capital and surplus requirements is required in the jurisdiction attachments.](#)

### **Statutory Deposit Requirements**

Some states require that a statutory deposit be on file in the domiciliary state. The [Statutory Deposit Requirements](#) chart on the UCAA website provides specific requirements and identifies those states that require deposits by foreign insurers and proof of a Statutory Deposit in the domiciliary state. A foreign insurer is an insurer that is domiciled in another state. Please refer to the [Certificate of Compliance and Certificate of Deposit Requirements](#) chart on the UCAA website for specific requirements for the date of issuance of the Certificate of Deposit ([Form 7](#))

from the file date of the application. Unless otherwise indicated, the statutory deposit is for the benefit of all policyholders. In the states where proof is required, the Certificate of Deposit ([Form 7](#)) prepared by its state of domicile can be uploaded under jurisdiction attachments or the domiciliary state can provide the certificate via the state to state communication link in the electronic application.

### **Name Approval**

Each state has different guidelines and procedures for name approval. The [Name Approval Requirements](#) chart serves as a guide for the various name approval requirements of each Uniform State. The Applicant Company should check with each state separately to ensure compliance with all applicable name approval requirements. Where applicable, provide evidence of name approval under jurisdiction attachment.

### **Plan of Operation**

The plan of operation has three components, a detailed narrative, proforma financial statements/projections (Form 13) and a completed Questionnaire ([Form 8](#)). The narrative should include significant information not captured as a part of the Questionnaire that the company submits in support of the application. The proforma is one of the three (3) components in the Plan of Operation. The forms are located under the Expansion Application tab. There is a proforma for Life, Property/Casualty, Health and Title companies. Provide a company-wide, three-year proforma balance sheet and income statement. The proforma workbook should be the same business type as the financial statement blank filed with the NAIC. For the lines requested, provide three-year premium and loss projections by line for the application state. Projections must support all aspects of the proposed plan of operation, including reinsurance arrangements and any delegated function agreements. Include the assumptions used to arrive at these projections.

The proforma when applied to the expansion application is projected data. As such, the projected amounts need not balance with historical NAIC financial filings. The projected data, however, should be relevant to the Applicant Company's history of growth and losses as contemplated by the NAIC *Accounting Practices and Procedures Manual*.

The proforma should be completed by statutory accounting or financial reporting professionals that should be available to answer any questions or concerns from reviewing regulatory staff. The proforma is completed on an annual basis, typically for a three-year time period, however, some states may require five years. The proforma should start with the first full year of operation that the Applicant Company anticipates actively writing business in the state(s) receiving the application. When providing five years of projections, the Applicant Company can provide two excel workbooks.

### **Proforma Financial Statements**

[Form 13 - Proforma Financial Statement \(Property/Casualty Companies\)](#)

[Form 13 - Proforma Financial Statement \(Life/Health Companies\)](#)

[Form 13 - Proforma Financial Statement \(Title Companies\)](#)

[Form 13 - Proforma Financial Statement \(Health Companies\)](#)

### **Holding Company Act Filings**

If the Applicant Company is a member of a holding company system, the application must include either the most recent Holding Company Act (HCA) filings, including the Annual Form “B” Registration Statement and related Form F, or a statement substantially similar to the NAIC [Insurance Holding Company System Regulatory Act \(#440\)](#). The filing should include all attachments, exhibits and appendices referenced in the HCA filings. The Holding Company Questionnaire and Debt to Equity statement are required if the Applicant Company is part of a Holding Company System, include all attachments and any amendments up to the filing date of the application.

### **Certificate of Compliance**

The application must include a Certificate of Compliance. Please refer to the [Certificate of Compliance and Certificate of Deposit Requirements](#) chart for specific requirements for the date of issuance of the Certificate of Compliance ([Form 6](#)) from the file date of the application. The domiciliary state must complete the Certificate of Compliance ([Form 6](#)) For electronic submission, the domiciliary state should upload or complete the certificate in the state to state communication section of the electronic filing.

### **Reports of Examination.**

The application must include a copy of the Applicant Company’s most recent Report of Financial Examination from its domiciliary state. The Applicant Company must also note all more recent examinations completed by any state, including market conduct examinations, and include a description of each examination. Refer to the [Reports of Examination Requirements](#) chart for the state’s exam “as of” date.

### **Statutory Memberships**

In some states, the Applicant Company is required to join one or more rating, guaranty or other organizations before transacting insurance. Generally, the authorized lines of insurance the Applicant Company can transact govern statutorily mandated memberships. Please be sure to check with each application state to inquire about any statutory memberships required before transacting insurance. The [Statutory Membership Requirements](#) chart is on the UCAA website. Submit documentation supporting membership application(s) in states under jurisdiction attachment.

### **Public Records Package**

Most states have requirements to disclose information to the public under a Public Records Act. To meet these public disclosure requirements certain items must accompany the application. While these documents may or may not be part of the substantive review, please be sure to include the documents with the application. The [Public Records Package](#) chart provides the state’s listing of items that can be provided in electronic format and which items are held confidential.

### **NAIC Biographical Affidavits**

A. The Applicant Company is required to submit an NAIC Biographical Affidavit ([Form 11](#)) in connection with pending or future application(s) for licensure or a permit to organize with a department of insurance in one or more states. The Applicant Company must submit an NAIC

Biographical Affidavit on behalf of all officers, directors and key managerial personnel of the Applicant Company and individuals with a ten percent (10%), or more, beneficial ownership in the Applicant Company or the Applicant Company's ultimate controlling person (Affiant). Individuals with ten percent (10%) or more beneficial ownership in the Applicant Company or Applicant Company's ultimate controlling person who do not file a biographical affidavit should file a copy of the Disclaimer of Control and approval from the domiciliary regulator.

B. The UCAA defines "Independent Third-Party" as:

1. A consumer reporting agency ("CRA") overseen by the Federal Trade Commission ("FTC") and, therefore, subject to the FCRA, which have been vetted and is currently on the approved list;
2. Has the ability to perform international background investigations; and
3. One whose officers and directors have no material affiliation with the Applicant Company other than stock ownership amounting to less than one percent (1%) of total stock outstanding, unless prior approval is given by the department of insurance to which application is being made.

C. The NAIC Biographical Affidavit requests information with respect to your employment history, education, personal information and character. The NAIC Biographical Affidavit also includes the Disclosure and Authorization Concerning Background Reports Form (the "Disclosure & Authorization Form"). The signature of the Affiant on the Disclosure & Authorization Form permits an Independent Third-Party to conduct an independent third-party verification on the Affiant.

D. The NAIC Biographical Affidavit includes three types of the Disclosure & Authorization Form. There are three different Disclosure & Authorization Forms since certain state laws, regulations and rules require different kinds of disclosures and wording within such form. An Affiant must sign the corresponding Disclosure & Authorization Form(s) for the respective state(s) where the Affiant has lived or worked within the last ten (10) years. Refer to the Disclosure & Authorization Forms for further information.

E. The NAIC Biographical Affidavit is used to evaluate the suitability, competency, character and integrity of the Affiant in connection with an Applicant Company's pending or future application(s) for licensure or a permit to organize with a department of insurance in one or more states.

The Independent Third-Party uses information contained in the NAIC Biographical Affidavit as a tool to perform an independent third-party verification to determine an individual's fitness and propriety. The independent third-party verification may contain information bearing on the Affiant's character, general reputation, personal characteristics, mode of living and credit standing (if required by the state). The Independent Third-Party Vendors shall use the independent third-party verification to create a background report (the "Background Report").

F. The Disclosure & Authorization Form is valid for a maximum of six months. Additionally, an Affiant may revoke the authorization at any time by delivering a written revocation to the Applicant Company. Refer to the Disclosure & Authorization Form for further information.

G. The Background Reports are subject to the Fair Credit Reporting Act (“FCRA”). Pursuant to FCRA, the state departments of insurance and an Applicant Company who is seeking admission are “users” of consumer reports. The FCRA requires that the Applicant Company provide the Affiant with a copy of the “Summary of Your Rights Under the Fair Credit Reporting Act.” Applicant Company’s should provide a copy of the “Summary of Your Rights under the Fair Credit Reporting Act” to each Affiant. This summary can be found at the Federal Trade Commission (“FTC”) [website](#). Background Reports are valid for six months from the signature date of the affidavit. Any alteration to the original biographical affidavit or updated signature will require a newly prepared background report.

H. The Applicant Company and state departments of insurance are required to comply with FCRA, especially as it relates to confidentiality of the information contained in such consumer reports. To the extent required by law, the states and Third-Party Vendors should maintain the Background Reports procured under the Disclosure & Authorization Form as confidential. A copy of the FCRA is located at [here](#).

I. The department of insurance in the state where an Applicant Company files or intends to file an application and the Applicant Company may require the Background Report. An Affiant who desires a copy of their Background Report, may request a copy from the Applicant Company or the CRA as indicated on the Disclosure & Authorization Form. Refer to the Disclosure & Authorization Form for further information.

J. Please check the [Fingerprint and Biographical Affidavit Requirements chart](#) for those states that require additional background information, such as fingerprints, in place of, or in addition to, NAIC Biographical Affidavits. If applying in one of those states, necessary fingerprints and processing fees should be included.

Refer to the [UCAA homepage](#) for a list of currently approved [Independent Third-Party Vendors for Background Reports](#).

NAIC Biographical Affidavits must be completed on the most **current form**, in effect at the time the affidavit was signed, and the affiant shall not sign the Affidavits more than six months before the date the Applicant Company files the application. Each question on the biographical affidavit must have a response. If an answer is “None”, then so state. Incomplete biographical affidavits could delay the background investigation report and result in a delay of the application review by the state.

Submit original Biographical Affidavits (Form 11) that contain the Disclosure & Authorization Forms to the state department(s) of insurance under the Management Information section of the application.

#### **Disclaimer of Control, Biographical Affidavit, Group Cover Letter and Addendum Pages**

[Form 9 - Disclaimer of Control](#)

[Form 11 - Biographical Affidavit](#)

[Form 11a - Biographical Affidavit Group Cover Letter](#)

[Form 11b - Biographical Affidavit Addendum - Residence](#)

[Form 11b - Biographical Affidavit Addendum - Education](#)

[Form 11b - Biographical Affidavit Addendum - Employment](#)

[Form 11b - Biographical Affidavit Addendum - Licenses](#)

[Form 11b - Biographical Affidavit Addendum - Professional Societies](#)

[Form 11b - Biographical Affidavit Addendum - General](#)

[Form 11b - Biographical Affidavit Addendum - Blank](#)

## Uniform Consent to Service of Process

Many jurisdictions require that the Applicant Company designate the insurance commissioner or a resident agent to receive service of process on behalf of the Applicant Company. In addition, the Applicant Company must designate a person or entity to receive a forwarded service of process after the commissioner receives the served documents. The Uniform Consent to Service of Process and the Resolution Authorizing Appointment of Attorney ([Form 12](#)) are required for this purpose. However, four states do not accept the Uniform Consent to Service of Process form. Those states are: California, Massachusetts, Virginia and Wisconsin. For those states, please see the [State-Specific Requirements](#) for any information regarding this subject. Pennsylvania does not accept service of process and does not require a form. **The Uniform Consent to Service of Process and Resolution Authorizing Appointment of Attorney is will be required for those jurisdictions that accept the uniform form.**

## State-Specific Information

Some jurisdictions may have additional requirements that the Applicant Company must meet other than that required above. Before completing a UCAA Expansion Application, the Applicant Company should review the [State-Specific](#) information for the listing of requirements for the state to which an application is being submitted. State-Specific items should be attached under jurisdiction attachments.

## III. How To File

Expansion applications must be filed electronically. Use the new portal link on the UCAA website, <https://authenticate.naic.org/>

**If the user is a consultant or part of a holding company structure, contact NAIC UCAA administration staff (Jane Barr) to have those company codes associated to the user id. ([jbarr@naic.org](mailto:jbarr@naic.org) or [brector@naic.org](mailto:brector@naic.org))**

## Create Expansion Application

The screenshot displays the UCAA Expansion Application portal. At the top, there are two tabs: 'Domestic Application' and 'Foreign Application', with 'Foreign Application' currently selected. To the right of the tabs is a red button labeled 'CREATE EXPANSION'. Below the tabs is a search section containing a search bar with the placeholder text 'Search Applications', a blue 'SEARCH' button, and a 'STATUS' dropdown menu set to 'Any'. At the bottom of the screenshot, the header of a table is visible, with columns labeled: Tracking Number, Cocode, Type, Change Type, Company Name, Jurisdiction / Status, and Last Modified.

**The User will have the option to create an expansion application for companies that are authorized/ associated with their User ID. The company should file expansion applications to states where they are seeking licensure.**



## Create New Expansion Application

**Company** ⓘ

90001 - New DE Company - Missouri (12-1234567)

ⓘ Your state of domicile is **Missouri**. Authorized Jurisdictions from Schedule T are automatically added below.

**Add the appropriate jurisdictions in which the Applicant Company is authorized to transact\***

Authorized Jurisdiction *Select One or More*

Authorized Jurisdiction (0)

**Add the appropriate jurisdictions to apply for expansion\***

Expansion Jurisdiction *Select One or More*

Expansion Jurisdiction (0)

CANCEL CLEAR ALL CREATE

## Application Requirements

Once the application is created, if applicable the group code and group name will populate on the general information page of the application and the holding company questionnaire will become a requirement of the application.

NAIC Cocode Group Code ⓘ Group Name ⓘ

If the company is part of a holding company structure, but does not qualify for an NAIC group code, identify the owner of 10% or more control over the insurer on the management information section and complete the Holding Company Questionnaire.

1) Ultimate Controlling Person: Any person, directly or indirectly, owns, controls, holds with the power to vote, or holds proxies representing, ten percent (10%) or more of the voting securities of any other person.

2) Insurance Holding Company System: Consists of two (2) or more affiliated persons, one or more of which is an insurer.

## Management Information

Role\* Full Legal Name\* Title\* UCP ⓘ Owner %

Officer John Doe Owner ☒

## Summary page

Expansion #1000268 - ABC Tes


Summary Jurisdictions BR Audit History


**Requirements**


- General Information ☒
- Lines of Business ☒
- Management Information ☒
- Main Questionnaire ☒
- Holding Co Questionnaire ☒
- Consent to Service of Process ☒
- Pro Forma ☒
- Jurisdiction Attachments ☒
- Narrative ☒
- NAIC Usage Fee ☒

**All sections of the application must be completed before the Submit button is available under Actions on the application summary page.**

**Actions**


 **MANAGE DESIGNEES**  
Modify who may view and action the application

 **ADD/REMOVE JURISDICTION**  
Modify the jurisdictions of the application

 **DELETE APPLICATION**  
Delete application and all of it's contents








## Summary Page

When the application is created, it will default to the summary page which contains pertinent information regarding the application. The summary page provides the status for each jurisdiction of the application, as it moves through the various submission and review/approval stages of the application process. A snapshot of the status is shown on the summary page, middle section. Or a detailed status is provided by selecting the Jurisdiction link at the top of the summary page. The status bar will indicate the status of the application.

Jurisdictions				
Jurisdiction	Contact	AV 	Status	Substatus
Connecticut	—	0	Completion	In Progress
Florida	—	0	Completion	In Progress

## Expansion #1000268 - ABC Test 2

Summary **Jurisdictions** RFI Audit History

Jurisdictions										
Q Search Foreign Jurisdictions		SEARCH	JURISDICTION   Any	STATUS   Any	SUBSTATUS   Any					
Jurisdiction	Contact	AV 	Status	Substatus	Submission	Acceptance	Review	Recommendation	Certification	Withdrawal
Alabama	 Jane AL REW	0	Pending Certification	Paused	9/25/2024	10/8/2024	10/8/2024	10/8/2024	—	—
Alaska	 Jane AK REW	0	Withdrawn	—	9/25/2024	10/8/2024	10/8/2024	10/8/2024	—	10/10/2024
Arizona	—	0	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Arkansas	 Jane AR REW	0	Certified	—	9/25/2024	10/7/2024	10/9/2024	10/9/2024	10/9/2024	—
Colorado	 Jane CO REW	2	Review	In Progress	9/25/2024	10/23/2024	—	—	—	—
Connecticut	—	0	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Delaware	 Jane DE REW	1	Review	In Progress	9/25/2024	10/16/2024	—	—	—	—
District of Columbia	—	0	Withdrawn	—	9/25/2024	—	—	—	—	10/8/2024
Georgia	—	1	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Hawaii	—	 0	Completion	In Progress	9/25/2024	—	—	—	—	—

While the application is in a Creation status, the substatus will remain in progress until the users submits the application to the intended jurisdiction.

After application submission, the substatus can show “paused” if the state has submitted a request for information (RFI) to the company and the substatus will remain paused until the Applicant Company has responded, via the RFI, with the necessary information to the application jurisdiction.

### Manage Designees

The User who creates the application will have access to work in the application. To allow other authorized users access they will need to be added individually. Only individuals with a UCAA ID can be added. When appropriate remove any User as a designee.



## Manage Designees

Add/remove designees from the application by updating the emails below

Email

Name

jbarr+ucaa.applicant6@naic.org

Jane Applicant



[+ Add New Designee](#)

[CANCEL](#)

[UPDATE](#)

### Statuses

**Creation:** an application has been started by the Applicant Company user and is currently being worked on/ completed by the company. (non-submitted)

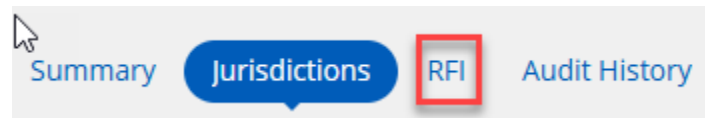
**Submission:** Before a PDF of the application forms can be created, a usage fee must be paid. Once payment has been confirmed/ validated, a separate link will appear in the Actions to Submit the Application. A DocuSign envelope will also be created to notify the designated officer or director of the request for signature via email.

**Signature:** Once the designated officer or director has signed the certification and attestation page it will automatically be sent to the intended jurisdiction. The Applicant Company can recall the signature, or the signatory officer can refuse to sign the document if the application needs to be edited.

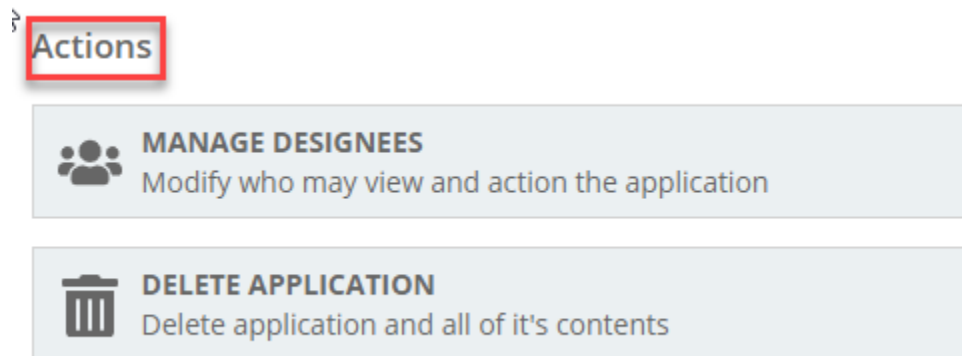
**Acceptance:** Once the intended jurisdiction receives the application, it will review the contents of the application to ensure all requirements have been met. When all requirements are met, the Jurisdiction will accept the application as complete and assign the review to their

regulatory team. A lead reviewer/state contact will be designated and listed under the Details section of the Summary page.

**Review:** A lead reviewer and other assigned state reviewers will receive notification that an expansion application has been assigned for their review. During this process if there are any questions regarding the application information or attachments the assigned reviewers will contact the Applicant Company via an RFI. The link to the RFI is located at the top, left side of the summary page.



Under the status bar and to the right of the summary page is a section labeled “Action” as the user works throughout the application various actions become available.



When a Lead Reviewer is assigned, they will be identified in the Details section on the Summary page.

Jurisdictions				
Jurisdiction	Contact	AV	Status	Substatus
Alabama	Jane AL REW	0	Pending Certification	Paused
Alaska	Jane AK REW	0	Withdrawn	—
Arizona	—	0	Pending Jurisdiction Acceptance	In Progress
Arkansas	Jane AR REW	0	Certified	—
Colorado	Jane CO REW	2	Review	In Progress
Connecticut	—	0	Pending Jurisdiction Acceptance	In Progress
Delaware	Jane DE REW	1	Review	In Progress
District of Columbia	—	0	Withdrawn	—
Georgia	—	1	Pending Jurisdiction Acceptance	In Progress
Hawaii	—	0	Completion	In Progress

**Recommendation:** the state has completed their review and will make a recommendation to either approve or not approve the application. If approved, the state may prepare and attach a consent order of additional requirements specified in the approval letter with necessary items/information that is required prior to certification. If not approved, the state will provide details of why the application was not approved included with the RFI.

**Certification:** The jurisdiction has confirmed the company details and may issue a certificate of authority. The state will also confirm the effective date of the approval.

**Withdraw:** If the state recommends non-approval, the company will need to withdraw their application. When the application is withdrawn the application and all open RFIs will automatically be closed. If the company fails to withdraw the application, the system will automatically move the application to a withdrawn status 30 days after the state makes their recommendation. This will be recorded in the Audit History.

### Requirements

All application requirements are located on the Summary page under Requirements. Each requirement input screen will populate the company data onto the appropriate application form. The symbol to the left will indicate the status of each requirement.



This symbol indicates that no information has been saved on this form.



This symbol indicates that information has been entered but all requirements have not been met or validated.



This symbol indicates that all required information has been entered and validated. When all required sections have been validated, the application can be submitted.

### NOTE:

Unless otherwise stated under state specific requirements, the User should upload pdf format for all attached documents, for the porforma financial statement upload both excel and pdf. files.

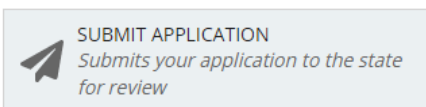
### Usage Fee

**FEES/CHARGES:** The company user must pay a transaction fee for use of the electronic UCAA which shall be collected at the time of filing. The NAIC reserves the right to change or modify the transaction fee upon thirty (30) days' notice to the filer. All fees and charges are non-refundable. NAIC reserves the right to terminate or disable access to UCAA in the event of non-payment of fees or charges.

The Usage fee must be paid before the link to create the Docusign envelop appears in the Actions section.

## Signatory Information

### Actions



The Signatory Information is generated from the list of Officers/Directors entered on the Management Information section of the application. Only officers (president, secretary, or treasurer) that are eligible to sign the Certification and Attestation will be listed in the drop-down menu. If applicable, the Uniform Consent to Service of Process will have a specific drop-down menu, the signatures of the certification and attestation and board resolution.

## Submit Application

⚠ Once signed, the submission is final and may need to be amended for additional changes

### Generated Documents

The following documents will be sent for signature. Please download and review for correctness and completeness. If any information is incorrect, please cancel out of this form, update the section(s), and submit the application.

📄 General Information-docx (59 KB)

📄 Lines of Business-docx (39 KB)

📄 Management Information-docx (39 KB)

📄 Main Questionnaire-docx (57 KB)

📄 Holding Co Questionnaire-docx (43 KB)

📄 Life Questionnaire-docx (46 KB)

📄 Narrative-docx (54 KB)

📄 Consent To Service Of Process-docx (51 KB)

### Signatory Information

These names are pulled from the Management Information section of the application where the title of the individual is one of the following: President, Secretary, Treasurer.

Application Signer \*

--- Select a full legal name ---

--- Select a full legal name ---

Jon Bon Jovi - President

CANCEL

Email \*

SUBMIT

## Application Submission

The application will automatically be submitted to the intended application jurisdiction once the officer of the company has reviewed the DocuSign PDF and signed the Certification and Attestation page and, if applicable, the uniform consent to service of process certificate and attestation and the board resolution.

### Request for Information (RFI)

During the state review process, the facilitator or lead reviewer may submit a request for clarification or pertinent information needed to their review of the application. When the state reaches out to the company via an RFI, the application substatus will change from “in

progress” to “paused”. A paused status means that the state is waiting on information from the company to move forward with their review.

UCAA Redomestication #1000073 - ABC Test Company

Summary **RFI** Audit History

Subject	Recipients	Status	Created By	Created On
approve	Jane Applicant	open	Jane Reviewer	October 3, 2023 10:22 AM
Need additional financial information	Jane Applicant	closed	Jane Reviewer	October 3, 2023 10:16 AM

CREATE RFI

To create an RFI, select the create button in the upper right corner of the screen. All open or closed RFIs will remain on the RFI summary screen.

### Create New Request For Information

Subject \*

Requested Information \*

Attachments

CANCEL CREATE

As a user you do not need to identify the recipient, the system automatically knows which regulator to send your inquiry to, depending on where the application is in the review process, either the state facilitator or reviewer.

## Audit History

The audit history allows the company user to track the progress of the application as it is completed. When more than one user updates information in any of the application sections it saves the information in the audit history.

UCAA Redomestication #1000429 - Medicare Advantage Inc.

Summary RFI **Audit History**

User	Event	AV	Description	Supporting Attachments	Date & Time
Jane Test	Designee(s) Added	ucaa.applicant0	—	—	October 9, 2023 1:34 PM
Jane Test	Holding Company Questionnaire Validated	—	—	—	October 9, 2023 1:15 PM
Jane Test	Debt to Equity Ratio Validated	—	—	—	October 9, 2023 1:15 PM
Jane Test	Management Information Validated	—	—	—	October 9, 2023 1:14 PM
Jane Test	Management Information Saved	—	—	—	October 4, 2023 1:57 PM
Jane Test	Line Of Business Form Validated	—	—	—	April 26, 2023 3:57 PM
Jane Test	Primary Form Validated	—	—	—	April 26, 2023 3:55 PM
Jane Test	Application Created	—	—	—	April 26, 2023 3:49 PM

8 items

## Application Review Process

The status of the application can be followed for each jurisdiction by viewing the status bar throughout the review process.

**Pending State Acceptance** – the state is reviewing the contents of the application to ensure all required information is available to begin the review process.

**Review Assignment** – A lead reviewer has been assigned, and tasks may be assigned to other areas of the department that specialize in the review of legal, financial or securities.

**Recommendation – Pending Certification** – the application has been approved and the state has issued a consent order of items that needs to be completed prior to the certificate of authority being issued to the company.

Summary **Jurisdictions** RFI Audit History

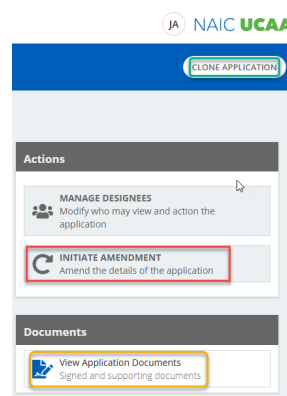
Jurisdictions

Q Search Foreign Jurisdictions **SEARCH** JURISDICTION | Any STATUS | Any SUBSTATUS | Any

Jurisdiction	Contact	AV	Status	Substatus	Submission	Acceptance	Review	Recommendation	Certification	Withdrawal
Alabama	Jane AL REW	0	Pending Certification	Paused	9/25/2024	10/8/2024	10/8/2024	10/8/2024	—	—
Alaska	Jane AK REW	0	Withdrawn	—	9/25/2024	10/8/2024	10/8/2024	10/8/2024	—	10/10/2024
Arizona	—	0	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Arkansas	Jane AR REW	0	Certified	—	9/25/2024	10/7/2024	10/9/2024	10/9/2024	10/9/2024	—
Colorado	Jane CO REW	2	Review	In Progress	9/25/2024	10/23/2024	—	—	—	—
Connecticut	—	0	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Delaware	Jane DE REW	1	Review	In Progress	9/25/2024	10/16/2024	—	—	—	—
District of Columbia	—	0	Withdrawn	—	9/25/2024	—	—	—	—	10/8/2024
Georgia	—	1	Pending Jurisdiction Acceptance	In Progress	9/25/2024	—	—	—	—	—
Hawaii	—	0	Completion	In Progress	9/25/2024	—	—	—	—	—

## Amend Application

The company may amend their application at any time after an application has been signed and submitted to the state. The initiate amendment button is active during the pending state acceptance to review statuses and even when the application has been placed in a “paused” substatus. Select “initiate amendment” under Actions.





Provide a thorough explanation as to why the application is being amended. This explanation will be provided in an RFI to the state, so they are aware that the application is being amended. The Applicant Company can choose one or more jurisdictions, for their amendment. The application jurisdiction will continue to have access to the application but will receive a notification that the application has been placed in amended status and can view the explanation in Audit History. Be as detailed as possible, so the state can focus their review on areas of the application that are not being amended.

### Initiate Amendment

You shall pay a transaction fee for use of UCAA which shall be collected prior to filing. The NAIC reserves the right to change or modify the transaction fee upon thirty (30) days notice to filer. All fees and charges are non-refundable. NAIC reserves the right to terminate or disable access to UCAA in the event of non-payment of fees or charges.

Jurisdiction \* Reason for Amendment \*

--- Select a Jurisdictions ---

- ✓ Arizona
- ✓ Colorado
- ✓ Connecticut
- ✓ Delaware
- ✓ Georgia
- ✓ Hawaii


0/1000


ment to process. Please do not close the form.

INITIATE AMENDMENT










If the company decides to withdrawal an application instead of amending, the amendment can be cancelled.

### Actions

 **MANAGE DESIGNEES**  
Modify who may view and action the application

 **CANCEL AMENDMENT**  
Revert application to previous version

A usage fee is required to amend the application. Use the “submit application” button to submit the amendment. The sections that were edited will highlight with a green check mark.

Requirements	Actions
✓ General Information 	 <b>MANAGE DESIGNEES</b> Modify who may view and action the application
✓ Lines of Business 	 <b>SUBMIT APPLICATION</b> Submits your application to the state for review
✓ Management Information 	 <b>CANCEL AMENDMENT</b> Revert application to previous version
✓ Main Questionnaire 	
✓ Jurisdiction Attachments 	
✓ NAIC Usage Fee 	

Before the application can be submitted for signature a cover letter will be created and a detailed explanation should be provided for each section that was edited.

**Initiate Amendment**

You shall pay a transaction fee for use of UCAA which shall be collected prior to filing. The NAIC reserves the right to change or modify the transaction fee upon thirty (30) days notice to filer. All fees and charges are non-refundable. NAIC reserves the right to terminate or disable access to UCAA in the event of non-payment of fees or charges.

Jurisdiction \* Reason for Amendment \*

--- Select a Jurisdiction --- 0/1000

✓ Arizona

✓ Colorado

✓ Connecticut

✓ Delaware

✓ Georgia

✓ Hawaii

ment to process. Please do not close the form.

**INITIATE AMENDMENT**

**Submit Application**

⚠ Once signed, the submission is final and may need to be amended for additional changes

**Generated Documents**

The following documents will be sent for signature. Please download and review for correctness and completeness. If any information is incorrect, please cancel out of this form, update the section(s), and submit the application.

📎 General Information-docx (75 KB) 📎 Lines of Business-docx (58 KB)

📎 Management Information-docx (56 KB) 📎 Main Questionnaire-docx (80 KB)

📎 Consent To Service Of Process-docx (73 KB)

**Amendment Details**

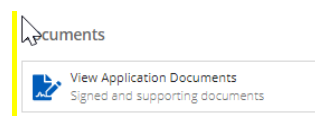
Provide details about the amendments made. These details will be provided to the state via a cover letter.

**General Information Section \***

**Main Questionnaire Section \***

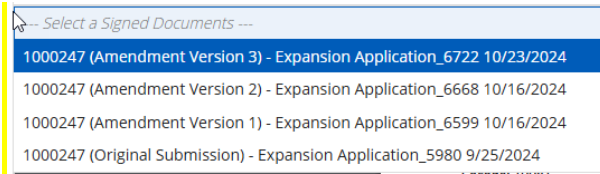
**Line of Business Section \***

**Once the application is signed and submitted to the state, the status will return to its original point in the review process and both complete versions of the application are available to view and download from the “View Application Documents” located on the summary page below the Actions.**



## Download Application

**Select Generate Zip and then the download zip link to view the zip file, located on the left header of the view documents.**

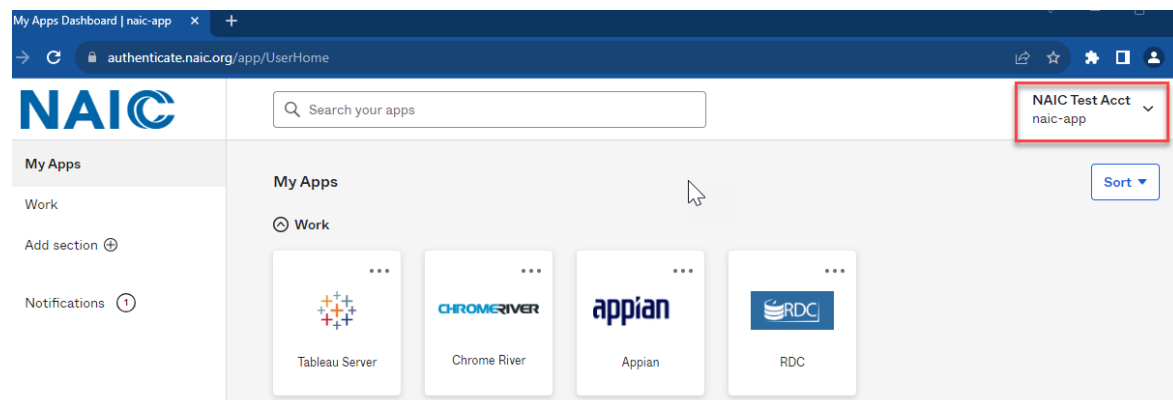


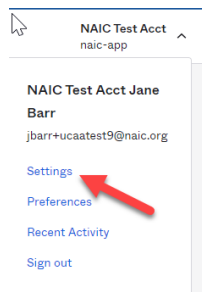
**The application files and attachments are sorted into sections. The download file will include all RFI communication with the state and the original pdf version of the signed application . Click on each folder to view the application template and attachments for each section. Each version of the application can be zipped and downloaded.**

<input type="checkbox"/> Name	Type
1-Cover Letter	File folder
2-General Information Section	File folder
3-Line of Business Section	File folder
4-Management Information Section	File folder
<input type="checkbox"/> 5-Debt to Equity Ratio Section	File folder
8H-Holding Company Questionnaire ...	File folder
8M-Main Questionnaire Section	File folder
12-Consent Service of Process	File folder
15-Jurisdiction Attachments	File folder
Certification and Attestation	File folder
1000824 (Amendment Version 1) - Re...	Microsoft Edge PDF Document

## Reset Password

**If the User needs to change their password, select the drop-down menu in the upper right corner of the webpage when logged in.**





The User will be prompted to verify their password, enter the current password or temporary password if one was provided. For security reasons, okta will send a push notification to ensure the correct user is updating the password. Complete the okta security, the user will be prompted to edit their personal information .

A screenshot of the NAIC password verification screen. It features the NAIC logo at the top left and the user name 'NAIC Test Acct Jane Barr' at the top right. The main content area has the heading 'Please verify your password' and a 'Password' label above a text input field. A 'Verify' button is located below the input field.

Before you can change your password, complete the Forgotten Password Question, for future assistance when locked out or if the password is forgotten.

A screenshot showing two forms. The top form is titled 'Change Password' and includes a section for 'Password requirements' (At least 9 characters) and three input fields for 'Current password', 'New password', and 'Confirm new password'. There is a checkbox for 'Sign me out of all other devices' and a 'Change Password' button. The bottom form is titled 'Forgotten Password Question' and includes an 'Edit' button. It contains a 'Question' label and the text 'What is the food you least liked as a child?'.

Scenario 1 : When No Objection Letter Attached while creating Redomestication Application

Email to Domestic state User with attcahments

Test AW 2024 (17594)

UD

ucca@cloudapps-dev.naic.org

To Neha Dangi (US)

Retention Policy US\_Exchange (3 years)

Expires 10/24/2027

Summarize

Reply

Reply All

Forward

Thu 10/24/2024 6:34 AM

TestDoc1.docx64 KB

TestDoc2.xlsx14 KB

TestDoc3.docx87 KB

A Redomestication application has been initiated on UCAA.

**Company:** Test AW 2024 (Cocode: 17594)  
**Application Jurisdiction:** Colorado  
**License Status:** Licensed  
**No Objection Letter:** Attached

Audit History for Company User with supporting documents

cloudapps-dev.naic.org/suite/sites/ucca/record/...

Managed bookmarks

DEV ENVIRONMENT

HOME RFI COMPANY DETAILS

NAIC UCAA

Redomestication #1001822 - Test AW 2024 ( 17594 )

Summary RFI Audit History

User	Event	AV	Description	Supporting Attachments	Date & Time
SYSTEM	Pre-Notification Attachments		No Objection Letter	Attachments (3)	October 24, 2024 5:34 AM
UCAA Applicant 1	Application Created		—	—	October 24, 2024 5:34 AM

cloudapps-dev.naic.org/suite/sites/ucaa/record/IUBkcwKboBzXv6ubpj1qUZ11YWaTuEfgwzXdNcnqiaVIBFZ-q5htTBYZQ4C4bnrqAvsQ4DCOX2Yb2ABdmb2fcIUaerlm8rhzP5AuXlwf-IIPQOju...

Managed bookmarks

DEV ENVIRONMENT

HOME RFI COMPANY DETAILS

NAIC UCAA

## Redomestication #1001822 - Test AW 2024 ( 17594 )

Summary RFI Audit History

User	Event	AV	Description	Supporting Attachments	Date & Time
SYSTEM	Pre-Notification Attachments		No Objection Letter	<a href="#">Hide Attachments</a> <ul style="list-style-type: none"> <li>TestDoc1</li> <li>TestDoc2</li> <li>TestDoc3</li> </ul>	October 24, 2024 5:34 AM
UCAA Applicant 1	Application Created	—		—	October 24, 2024 5:34 AM

## Scenario 2 : When No Objection Letter Not Attached while creating Redomestication Application

### Email to Domestic state User without attachments

Quarrier Leonardtown Insurance (10657)

ucaa@cloudapps-dev.naic.org

To: Neha Dangi (US)

Retention Policy US\_Exchange (3 years)

Expires 10/24/2027

Summarize

Reply Reply All Forward

Thu 10/24/2024 5:54 AM

A Redomestication application has been initiated on UCAA.

**Company:** Quarrier Leonardtown Insurance (Cocode: 10657)

**Application Jurisdiction:** Georgia

**License Status:** Licensed

**No Objection Letter:** No Attachments

### Audit History for Company User with no supporting documents

cloudapps-dev.naic.org/suite/sites/ucaa/record/IUBkcwKboBzXv6ubpj1qUZ11YWaTuEfgwzXdNcnqiaVIBFZ-q5htTBYZQ4C4bnrqAvsQ4DCOX2Yb2ABdmb2PUIFSGjIEfYwHbEDpPpDmf9Fols...

Managed bookmarks

DEV ENVIRONMENT

HOME RFI COMPANY DETAILS

NAIC UCAA

## Redomestication #1001814 - Quarrier Leonardtown Insurance ( 10657 )

Summary RFI Audit History

User	Event	AV	Description	Supporting Attachments	Date & Time
SYSTEM	Pre-Notification Attachments		No Objection Letter	—	October 24, 2024 4:54 AM
UCAA Applicant 1	Application Created	—		—	October 24, 2024 4:53 AM

## Port Notification (Domiciliary Filing)

HOME
RFI
COMPANY DETAILS

NAIC
UCAA

Corporate Amendment # 1000941 - Demo Insurance Company (12345)

Summary
RFI
Audit History

CREATION  
5/21/2024

SUBMISSION

SIGNATURE

ACCEPTANCE

REVIEW ASSIGNMENT

REVIEW

RECOMMENDATION

CERTIFICATION

Requirements

General Information

Lines of Business

Pro Forma

Narrative

Management Information

Jurisdiction Attachments

NAIC Usage Fee

Additional Details

Substatus  
In Progress

Cocode  
12345

Amendment version  
0

FEIN  
22-6262626

Group Code  
-

Group Name  
-

Created By  
Constance Moore

Submitted on  
-

Change Type  
• Redomestication

Actions

MANAGE DESIGNEES  
Modify who may view and action the application

DELETE APPLICATION  
Delete application and all of its contents

Redomestication Application - 1002388

UQ
ucaaa@cloudapps-qa.naic.org  
To: Soner Mercan

Reply
Reply All
Forward

Fri 10/18/2024 10:48 AM

Dummyfile.png  
875 KB

Dummyfile1.png  
875 KB

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Application has been certified.

Effective Date: 10/18/2024

Any COA and additional supporting documents are attached. Please review additional details provided below.

Test Jurisdiction Specific Information

NOTE: A system generated post-notification application has been created, (tracking number link). Required information from the certified redomestication has been populated into the new corporate amendment. Verify any additional requirements and submit to the prior domestic jurisdiction for approval.

Pre and Post Redomestication Domestic Requirements Chart

State	Requires Pre-Notification	Requires Post-Notification Filing	Additional State Specific Requirements
<b>AL</b>	Yes	Yes	None
<b>AK</b>	Yes	Yes	None
<b>AZ</b>	Yes	No	None
<b>AR</b>	Yes	Yes	None
<b>CA</b>	Yes	Yes	None
<b>CO</b>	Contact State	Contact State	Contact State
<b>CT</b>	Yes	No	None
<b>DE</b>	Yes	No	None
<b>DC</b>	Contact State	Contact State	Contact State
<b>FL</b>	Contact State	Contact State	Contact State
<b>GA</b>	Yes	Yes	GID-003 and GID-004 <a href="https://oci.georgia.gov/document/document/appointment-attorney-fact-insurerpdf/download">https://oci.georgia.gov/document/document/appointment-attorney-fact-insurerpdf/download</a>  <a href="https://oci.georgia.gov/document/document/gid-004-rs-1pdf/download">https://oci.georgia.gov/document/document/gid-004-rs-1pdf/download</a>
<b>HI</b>	Contact State	Contact State	Contact State
<b>ID</b>	Yes	No	None
<b>IN</b>	Contact State	Contact State	Contact State
<b>IA</b>	Contact State	Contact State	Contact State
<b>KS</b>	Yes	Yes	None
<b>KY</b>	Contact State	Contact State	Contact State
<b>LA</b>	Contact State	Contact State	Contact State
<b>ME</b>	Yes	Yes	None
<b>MD</b>	Contact State	Contact State	Contact State
<b>MI</b>	Yes	Yes	None
<b>MA</b>	Contact State	Contact State	Contact State
<b>MN</b>	Yes	Yes	None
<b>MS</b>	No	Yes	None
<b>MO</b>	Yes	Yes	Application to Amend Certificate of Authority.



			<a href="https://insurance.mo.gov/industry/forms/documents/375-0558.pdf">https://insurance.mo.gov/industry/forms/documents/375-0558.pdf</a>
<b>MT</b>	Yes	Yes	None
<b>NE</b>	Yes	Yes	None
<b>NV</b>	Contact State	Contact State	Contact State
<b>NH</b>	Yes	Yes	None
<b>NJ</b>	Yes	Yes	Sample Certificate of Voluntary Relinquishment of Certificate of Incorporation - Form not available via DOBI website.
<b>NM</b>	Contact State	Contact State	Contact State
<b>NY</b>	Contact State	Contact State	Contact State
<b>NC</b>	Yes	Yes	None
<b>ND</b>	Yes	Yes	None
<b>PA</b>	No	Yes	None
<b>OH</b>	Contact State	Contact State	Contact State
<b>OK</b>	Contact State	Contact State	Contact State
<b>OR</b>	Contact State	Contact State	Contact State
<b>PA</b>	Contact State	Contact State	Contact State
<b>PR</b>	Contact State	Contact State	Contact State
<b>RI</b>	Yes	Yes	None
<b>SC</b>	Yes	Yes	None
<b>SD</b>	Contact State	Contact State	Contact State
<b>TN</b>	Contact State	Contact State	Contact State
<b>TX</b>	Contact State	Contact State	Contact State
<b>UT</b>	Yes	Yes	Notification letter addressed to the Commissioner.
<b>VT</b>	Yes	Yes	None
<b>VA</b>	Yes	Yes	None
<b>WA</b>	Yes	Yes	Provide a copy of the redomestication application in its entirety for review. WA requires the insurer to be fully compliant before allowing redomestication from WA to the new state.
<b>WV</b>	Yes	Yes	None
<b>WI</b>	Yes	Yes	None

<b>WY</b>	Yes	Yes	None
-----------	-----	-----	------