

Draft date: 9/10/2025
Virtual Meeting

RISK-FOCUSED SURVEILLANCE (E) WORKING GROUP

October 1, 2025

11:00 a.m. – 12:00 p.m. ET / 10:00 – 11:00 a.m. CT / 9:00 – 10:00 a.m. MT / 8:00 – 9:00 a.m. PT

ROLL CALL

Amy Malm, Chair	Wisconsin	Tadd Wegner	Nebraska
Johanna Nickelson, Vice Chair	South Dakota	Paul Lupo	New Jersey
Blase Abreo	Alabama	Mark McLeod	New York
Laura Clements/Michelle Lo	California	Jackie Obusek/Monique Smith	North Carolina
Jack Broccoli/William Arfanis	Connecticut	Dwight Radel/Tracy Snow	Ohio
Carolyn Morgan/Jane Nelson	Florida	Eli Snowbarger	Oklahoma
Cindy Andersen	Illinois	Ryan Keeling	Oregon
Roy Eft	Indiana	Diana Sherman	Pennsylvania
Daniel Mathis	Iowa	John Tudino/Ted Hurley	Rhode Island
Melissa Gibson	Louisiana	Amy Garcia	Texas
Vanessa Sullivan	Maine	Jake Garn	Utah
Dmitriy Valekha	Maryland	Dan Petterson	Vermont
Kristin Hynes	Michigan	Greg Chew/Jennifer Blizzard	Virginia
John Regagen/Shannon Schmoeger	Missouri	Tarik Subbagh/Steve Drutz	Washington

NAIC Support Staff: Bruce Jenson/Jane Koenigsman

AGENDA

1. Consider Adoption of Proposed Changes to Analyst/Examiner Salary Ranges— Attachment A
Amy Malm (WI)
2. Any Other Matters—*Amy Malm (WI)*
3. Adjournment

To: Chief Financial Regulators and Interested Regulators

From: NAIC Staff

Date: September 10, 2025

RE: Recommended Increases to Financial Analyst and Examiner Salary Range Guidelines and Financial Examiner Per Diem Rates

The Risk-Focused Surveillance (E) Working Group is charged with maintaining and updating salary range guidelines for financial analysts and financial examiners published in the *Financial Analysis Handbook* and *Financial Condition Examiners Handbook*, respectively. The Working Group expects to consider updates to the salary ranges every two years, with a salary survey conducted during 2025, and resulting recommendations to be considered for inclusion in the 2026 Handbooks. Additionally, as several states currently base examiner compensation on the salary and per diem guidelines contained in Section 1-II(D) of the *Financial Examiners Handbook*, the Working Group expects to update per diem rates annually. Suggested increases to the salary ranges and per-diem rates are included in this memo.

Salary Range Guidelines

In 2019 the Working Group adopted salary range guidelines that were developed in recognition of the importance of compensation, particularly as it relates to the ability of an Insurance Department to attract and retain well-qualified employees. These guidelines, which were first published in the 2020 editions of the *Financial Analysis Handbook* and *Financial Condition Examiners Handbook*, were based on an in-depth salary survey that collected and analyzed salary data for state insurance regulators, banking regulators, and other related positions in the financial services sector (e.g., internal and external auditors, etc.). The salary ranges recommended in this memo are based in part on the salary-only results of the 2025 Insurance Department Resources Report (IDRR) survey for financial regulatory positions.

Current compensation data were collected from 50 localities in a broad survey of Departments' compensation associated with the IDRR. Cost of living at or near each location was determined from the Council for Community and Economic Research (C2ER) Cost of Living Index for purposes of standardizing and aggregating the data for analysis. In 11 instances where data was unavailable for the department's location, data from nearby locales were used. When several nearby locales were available, their values were averaged. All salary data were then adjusted using these cost-of-living values to a national average. Locality-adjusted salary data were weighted by the number of reported positions at each Department.

To facilitate a comprehensive comparison when establishing recommended compensation ranges, data from multiple industry sources were gathered. Salary information for corporate internal audit and financial analyst positions was obtained from Robert Half for the same locations represented in the survey responses. Compensation figures for public accounting audit and assurance roles were also sourced from Robert Half, although equivalent data was not available for the Examiner-In-Charge (EIC)/Supervisor/Assistant Chief Examiner level. In addition, comparable salary data

was obtained from two federal banking regulator organizations: The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC). Unfortunately, state banking data was insufficiently available for reliable comparison.

These data were then compared to determine the suggested new compensation range guidance in the Handbooks. Initial suggested values for the ranges were considered based on the weighted average and the weighted standard deviation from the survey data, then adjusted based on reported compensation for the comparable positions as many of the ranges lag behind their comparable industry and banking regulator values. These increases are calibrated by position to mitigate salary compression and address salary gaps in the more senior positions. Steps were taken to limit the number of departments positioned outside these updated ranges following the adjustment.

As noted in Handbook guidance, these values are intended to represent national, salary-only compensation ranges broadly applicable across all jurisdictions and based on a national average cost of living. Individual jurisdictions may need to adjust these ranges to their location’s cost of living before comparison to their pay structure. In addition, the complexity of insurers in a specific state and/or the specialized knowledge and skills required to regulate them could impact the appropriateness of the range to a particular jurisdiction or position.

Please note that as the ranges were last adjusted in 2023 for publication in the 2024 NAIC Handbooks, the recommended increases to the ranges reflect a two-year adjustment period.

Positions	Current Range		Proposed Range		Recommended Increase	
	Low	High	Low	High	Low	High
Financial Analyst / Examiner	\$ 52,000	\$ 85,000	\$ 58,000	\$ 95,000	11.5%	11.8%
Sr Financial Analyst / Examiner	\$ 64,500	\$ 105,000	\$ 77,000	\$ 123,000	19.4%	17.1%
EIC / Supervisor / Asst Chief	\$ 87,000	\$ 150,000	\$ 95,000	\$ 165,000	9.2%	10.0%
Chief Analyst / Examiner	\$ 100,000	\$ 170,000	\$ 115,000	\$ 210,000	15.0%	23.5%

Daily Rate Guidelines

Adjustments to the per diem guidelines are largely based upon changes in the Consumer Price Index (CPI). The CPI, as defined by the U.S. Bureau of Labor Statistics (BLS), is a measure of the average change in prices of goods and services purchased by households over time. The CPI is based on prices of food, clothing, shelter, fuels, transportation fares, charges for doctors’ and dentists’ services, drugs, and other goods and services purchased for day-to-day living. In 2008, regulators determined that because the CPI takes into consideration most costs incurred by the average household, it is reasonable that an increase in salary should be within the same parameters as the increase in the cost of living.

The following data table shows the average annual salary increases adopted in the previous four years as compared to the CPI, as well as the proposed increase for the following year. The information “as published by BLS” compares the CPI as of July of each year, consistent with the

analysis performed in past years. As shown below, the rates suggested by the NAIC have been consistently comparable to those published by the BLS, regardless of method used.

	2021	2022	2023	2024	2025
As Published in the next <i>Financial Condition Examiners Handbook</i>	4.50%	8.50%	3.20%	2.90%	2.70%*
As Published by BLS	5.37%	8.52%	3.18%	2.89%	2.70%
Difference	-0.87%	-0.02%	0.02%	0.01%	0.00%

*Suggested Change

Based upon the July 2025 CPI data, the estimated annual change in CPI is approximately 2.7%. As such, if the Committee intends to base salary increase on changes in the CPI, we recommend a 2.7% increase in all position classifications as shown below.

Classification	2025 Daily Rates	Suggested Increase	2026 Daily Rates
Insurance Company Examiner, AFE*	\$407	2.70%	\$418
Automated Examination Specialist, AFE (no AES**)	\$500	2.70%	\$514
Senior Insurance Examiner, CFE***	\$500	2.70%	\$514
Automated Examination Specialist, AES	\$562	2.70%	\$577
Automated Examination Specialist, CFE (no AES)	\$562	2.70%	\$577
Insurance Examiner In-Charge, CFE	\$602	2.70%	\$618
Supervising or Administrative Examiner	\$638	2.70%	\$655

*Accredited Financial Examiner
 **Automated Examination Specialist
 *** Certified Financial Examiner