

Draft date: 11/20/25

*Virtual Meeting*

**SURPLUS LINES (C) TASK FORCE**

Wednesday, December 3, 2025

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

**ROLL CALL**

**NAIC Member**

Larry D. Deiter, Chair  
Timothy J. Temple, Vice Chair  
Mark Fowler  
Heather Carpenter  
Maria Ailor  
Ricardo Lara  
Michael Conway  
Trinidad Navarro  
Karima M. Woods  
Michael Yaworsky  
John F. King  
Michelle B. Santos  
Scott Saiki  
Dean L. Cameron  
Holly W. Lambert  
Doug Ommen  
Vicki Schmidt  
Marie Grant  
Michael T. Caljouw  
Grace Arnold  
Mike Chaney  
Remedio C. Mafnas  
Ned Gaines  
Justin Zimmerman  
Glen Mulready  
Michael Humphreys  
Michael Wise  
Cassie Brown  
Tregenza A. Roach  
Patty Kuderer  
Allan L. McVey

**Representative**

Larry D. Deiter, Chair  
Timothy J. Temple, Vice Chair  
Jimmy Gunn  
Sian Ng-Ashcraft  
Lori Dreaver Munn  
Audrie Lee  
Michael Conway  
Susan Jennette  
Angela King  
Jane Nelson  
Scott Sanders  
Michelle B. Santos  
Lance Hirano  
Randy Pipal  
Holly W. Lambert  
Kim Cross  
Julie Holmes  
Erin Nickles  
Jim McCarthy  
Gregory Maus/Kathleen Orth  
David Browning  
Remedio C. Mafnas  
Ned Gaines  
Justin Zimmerman  
Eli Snowbarger  
Michael Humphreys  
Ryan Basnett  
Jamie Walker  
Glendina Matthew  
Andrew Davis  
Allan L. McVey

**State/Territory**

South Dakota  
Louisiana  
Alabama  
Alaska  
Arizona  
California  
Colorado  
Delaware  
District of Columbia  
Florida  
Georgia  
Guam  
Hawaii  
Idaho  
Indiana  
Iowa  
Kansas  
Maryland  
Massachusetts  
Minnesota  
Mississippi  
N. Mariana Islands  
Nevada  
New Jersey  
Oklahoma  
Pennsylvania  
South Carolina  
Texas  
U.S. Virgin Islands  
Washington  
West Virginia

NAIC Support Staff: Andy Daleo

## **AGENDA**

1. Consider Adoption of its Summer National Meeting Minutes Attachment A  
—*Director Larry D. Deiter (SD)*
2. Consider Adoption of the Report of the Surplus Lines (C) Working Group  
—*Eli Snowbarger (OK)*
3. Discuss Recognition of RIMS-Certified Risk Management Professional (CRMP)  
as a Qualifying Credential for Meeting the Nonadmitted and Reinsurance  
Reform Act's (NRRA's) Qualified Risk Manager Competency Standard—*Jeff  
Klein (McIntyre & Lemon)* Attachment B
4. Discuss Any Other Matters Brought Before the Task Force  
—*Director Larry D. Deiter (SD)*
5. Adjournment

Draft: 8/10/25

Surplus Lines (C) Task Force  
Virtual Meeting  
July 31, 2025

The Surplus Lines (C) Task Force met July 31, 2025. The following Task Force members participated: Larry D. Deiter, Chair, Johanna Nickelson, and Frank Marnell (SD); Timothy J. Temple, Vice Chair, represented by Tom Travis (LA); Heather Carpenter represented by Sian Ng-Ashcraft (AK); Mark Fowler represented by Jimmy Gunn (AL); Maria Ailor represented by Lori Dreaver Munn (AZ); Ricardo Lara represented by David Ta (CA); Trinidad Navarro represented by Susan Jennette (DE); Michael Yaworsky represented by Jane Nelson (FL); John F. King represented by Scott Sanders (GA); Scott Saiki represented by Lance Hirano (HI); Doug Ommen represented by Kim Cross (IA); Dean L. Cameron represented by Randy Pipal (ID); Vicki Schmidt represented by Craig Van Aalst (KS); Michael T. Calijouw represented by Jim McCarthy (MA); Marie Grant represented by Erin Nickles (MD); Grace Arnold represented by Kathleen Orth (MN); Justin Zimmerman represented by Aileen Egan (NJ); Ned Gaines represented by Gennady Stolyarov (NV); Glen Mulready represented by Eli Snowbarger (OK); Michael Wise represented by Rachel Moore (SC); Cassie Brown represented by Jamie Walker (TX); and Patty Kuderer represented by Nicole Rayl (WA).

1. Adopted its Spring National Meeting Minutes

Walker made a motion, seconded by Snowbarger, to adopt the Task Force's Feb. 27 minutes (*see NAIC Proceedings – Spring 2025, Surplus Lines (C) Task Force*). The motion passed unanimously.

2. Adopted the Report of the Surplus Lines (C) Working Group

Snowbarger stated that the Working Group met March 19 in regulator-to-regulator session, pursuant to paragraph 3 (specific companies, entities, or individuals) of the NAIC Policy Statement on Open Meetings. During this meeting, the Working Group approved one application for admittance to the April 1 *Quarterly Listing of Alien Insurers*.

Travis made a motion, seconded by Munn, to adopt the report of the Surplus Lines (C) Working Group. The motion passed unanimously.

3. Adopted its 2026 Proposed Charges

Director Deiter stated that the 2026 proposed charges for the Task Force and the Surplus Lines (C) Working Group remain unchanged from their previous charges.

Walker made a motion, seconded by Travis, to adopt the Task Force's 2026 proposed charges (Attachment \_\_\_\_). The motion passed unanimously.

4. Heard a Presentation on Surplus Lines Industry Results

Andy Daleo (NAIC) and Bree Wilson (NAIC) provided a presentation on year-end 2024 surplus lines industry results (Attachment \_\_\_\_). The summary included details on participants in the U.S. surplus lines market, writings, and trends in the industry. The presentation also included market exposure for cybersecurity and private flood.

Following the summary, Director Deiter indicated that the industry results would be posted on the Surplus Lines (C) Working Group's web page.

Having no further business, the Surplus Lines (C) Task Force adjourned.

SharePoint/NAIC Support Staff Hub/Member Meetings/C CMTE/SLTF/2025 Fall NM/SLTF Minutes July 31 2025.docx

Arshawn Teymoorian  
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ateymoorian@mcintyrelf.com

October 31, 2025

Larry D. Deiter, Chair  
Timothy J. Temple, Vice Chair

Surplus Lines (C) Task Force  
NAIC Central Office  
1100 Walnut Street, Suite 1000  
Kansas City, MO. 64106

Attention: Andy Daleo  
Sent via email: [adaleo@naic.org](mailto:adaleo@naic.org)

**RE: Recognition of RIMS-CRMP for Qualified Risk Managers**

Dear Chair Deiter and Vice Chair Temple:

We are writing on behalf of the Risk and Insurance Management Society (RIMS) to request that the Surplus Lines Task Force develop a model bulletin recognizing the RIMS-Certified Risk Management Professional (RIMS-CRMP) as a qualifying credential for a *qualified risk manager* (QRM). Congress enacted the Nonadmitted and Reinsurance Reform Act (NRRA) in 2010, explicitly identifying the RIMS Fellow (RF) designation as evidence of minimum competency in risk management. Six years later, in 2016, RIMS introduced the RIMS-CRMP as the direct successor to the RF. To the best of our knowledge, no state insurance department has yet approved the RIMS-CRMP, leaving a critical gap in recognition despite its enhanced standards. A model bulletin would close this gap by providing state insurance departments with uniform guidance affirming that the RIMS-CRMP has superseded the RF designation and satisfies the NRRA's minimum competency in risk management standard.

**Statutory Framework and Context**

The NRRA defines a QRM as an employee or consultant retained by a commercial policyholder who is skilled in loss prevention, risk analysis, and insurance procurement. QRMs serve as essential gatekeepers, enabling efficient and responsible procurement through informed risk assessment and coverage selection. To establish baseline qualifications, the NRRA explicitly recognizes four designations as proof of minimum competency, including the RIMS Fellow (RF) issued by the Global Risk Management Institute.<sup>1</sup>

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<sup>1</sup> Other qualification pathways include designations as a Chartered Property and Casualty Underwriter (CPCU) issued by The Institutes Risk and Insurance Knowledge Group, Associate in Risk Management (ARM) issued by The Institutes Risk and Insurance Knowledge Group, Certified Risk Manager (CRM) issued by The National Alliance for Insurance Education & Research, and/or meeting certain educational and experience criteria.

Anticipating advancements in the field, Congress also incorporated flexibility into the NRRRA by empowering states to approve “any other designation, certification, or license determined by a State insurance commissioner or other State insurance regulatory official or entity to demonstrate minimum competency in risk management.”<sup>2</sup> Like other provisions in the NRRRA, Congress deliberately delegated this authority to states, consistent with the McCarran-Ferguson Act's foundational principle that states serve as the primary regulators of insurance. This delegation enables QRM standards to evolve alongside professional practices, accommodating successors such as the RIMS-CRMP without necessitating federal amendment.

### **The RIMS-CRMP Meets the NRRRA’s Minimum Competency Standard**

The RIMS-CRMP represents the highest standard of professional competency in the field. Accredited by the American National Standards Institute (ANSI) National Accreditation Board (ANAB) under ISO/IEC 17024:2012 and governed by an independent commission, it validates expertise, technical knowledge, and ethical commitment to risk management.

Its curriculum focuses on five core competencies:

- Analyzing organizational risks to identify and assess exposures.
- Designing strategic risk mitigation plans to reduce losses.
- Implementing risk management processes to operationalize controls.
- Building risk-aware organizational cultures.
- Supporting data-driven decisions for insurance coverage, risk financing and resilience.

These competencies not only mirror the NRRRA’s core requirements but also exceed them by incorporating contemporary issues—such as cyber risk, ESG factors, global supply chains, and artificial intelligence—that confront today’s multinational policyholders.

Candidates must satisfy exceptionally stringent requirements to earn and retain the RIMS-CRMP:

- Education/Experience: Candidates must have either (1) a bachelor’s degree in risk management, business, finance, or a related field plus three years of experience in risk financing, claims administration, loss prevention, or insurance analysis, or (2) six years of such experience without a degree.<sup>3</sup>
- Examination: A 120-question, multiple-choice exam, administered in a proctored session, tests risk management, risk financing, compliance, and strategic decision-making.<sup>4</sup>

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<sup>2</sup> 15 U.S.C. § 8206(13)(C)(i)(II)(bb)(EE)

<sup>3</sup> The Certification Handbook provides further detail regarding the certification program’s eligibility requirements and is available at, [https://www.rims.org/docs/default-source/default-document-library/certification/rims-crmp\\_handbook\\_2025\\_final.pdf?sfvrsn=1422865e\\_3](https://www.rims.org/docs/default-source/default-document-library/certification/rims-crmp_handbook_2025_final.pdf?sfvrsn=1422865e_3)

<sup>4</sup> Additional information regarding the examination, including the exam blueprint is available at, <https://www.rims.org/certification/rims-crmp/exam-content>

- Recertification & Continuing Education: Recertification requires at least fifty points or hours every two years, with thirty-five points or hours from continuing education activities in risk management.<sup>5</sup>

## Conclusion

The RIMS-CRMP's ANAB/ISO 17024:2012-accredited framework, comprehensive curriculum, and direct succession from the RF designation unequivocally satisfy—and surpass—the NRRA's minimum competency standard. We request that the Task Force adopt a model bulletin to address the outdated reference to the RF designation, formally recognize the RIMS-CRMP as its successor, and thereby increase the availability of QRMs for sophisticated commercial insureds.

We appreciate your consideration of this request and stand ready to provide additional information, testimony, or draft model language as needed.

Sincerely,

*Arshawn Teymoorian*

Arshawn Teymoorian, Partner  
Jeff Klein, Of Counsel

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<sup>5</sup> General information about the RIMS-CRMP can be found online at <https://www.rims.org/certification>