

Draft date: 2/24/26

Virtual Meeting

SURPLUS LINES (C) TASK FORCE

Thursday, March 5, 2026

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

ROLL CALL

NAIC Member	Representative	State/Territory
Larry D. Deiter, Chair	Larry D. Deiter, Chair	South Dakota
Glen Mulready, Vice Chair	Eli Snowbarger	Oklahoma
Mark Fowler	Dusty Smith	Alabama
Heather Carpenter	Sian Ng-Ashcraft	Alaska
Peter M. Fuimaono	Elizabeth Perri	American Samoa
Charles Bassett	Lori D. Munn	Arizona
Ricardo Lara	Audrie Lee	California
Michael Conway	Jason Lapham	Colorado
Trinidad Navarro	Susan Jennette	Delaware
Karima M. Woods	Angela King	District of Columbia
Michael Yaworsky	Jane Nelson	Florida
Michelle B. Santos	Michelle B. Santos	Guam
Dean L. Cameron	Randy Pipal	Idaho
Holly W. Lambert	Patrick O'Connor	Indiana
Doug Ommen	Kim Cross	Iowa
Timothy J. Temple	Shantell Taylor	Louisiana
Grace Arnold	Kathleen Orth	Minnesota
Mike Chaney	David Browning	Mississippi
Remedio C. Mafnas	Maryann Borja-Arriola	N. Mariana Islands
Susan Ochs	Susan Ochs	New Jersey
Mike Causey	Robert Croom	North Carolina
Michael Humphreys	Michael McKenney	Pennsylvania
Suzette M. Del Valle	Glorimar Santiago	Puerto Rico
Michael Wise	Ryan Basnett	South Carolina
Amanda Crawford	Jamie Walker	Texas
Tregenza A. Roach	Glendina Matthew	U.S. Virgin Islands
Patty Kuderer	Andrew Davis	Washington

NAIC Committee Support: Andy Daleo

AGENDA

1. Consider Adoption of its 2025 Fall 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 Correction of the *Nonadmitted Insurance Model Act (#870)* Attachment B
—*Andy Daleo (NAIC)*
4. Discuss the Nonadmitted and Reinsurance Reform Act's (NRRRA's) Qualified Risk
Manager Competency Standard for Exempt Commercial Purchasers and a Path
Forward to Recognize the RIMS-Certified Risk Management Professional (RIMS-
CRMP) Qualifying Credential—*Jeff Klein (McIntyre & Lemon)* Attachment C
5. Discuss Comments on the Nonadmitted Insurance Model Act (#870) from the Attachment D
Wholesale & Specialty Insurance Association (WSIA)—*John Meetz (WSIA)*
6. Discuss Any Other Matters Brought Before the Task Force
—*Director Larry D. Deiter (SD)*
7. Adjournment

Draft: 12/15/25

Surplus Lines (C) Task Force
Virtual Meeting
December 3, 2025

The Surplus Lines (C) Task Force met Dec. 3, 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); Ricardo Lara represented by Audrie Lee (CA); Michael Conway represented by Renee Sanchez (CO); Karima M. Woods represented by Omar Barakat (DC); Michael Yaworsky represented by Ainsley Hurley (FL); John F. King represented by Scott Sanders (GA); Scott Saiki represented by Lance Hirano (HI); Dean L. Cameron represented by Randy Pipal (ID); Michael T. Caljouw represented by Jim McCarthy (MA); Marie Grant represented by Erin Nickles (MD); Grace Arnold represented by Kathleen Orth (MN); Justin Zimmerman represented by William Leach (NJ); Ned Gaines (NV); Glen Mulready represented by Eli Snowbarger (OK); Michael Humphreys represented by Mike McKenney (PA); Michael Wise represented by Ryan Basnett (SC); Cassie Brown represented by Amy Garcia (TX); Patty Kuderer represented by Nicole Rayl (WA); and Allan L. McVey (WV).

1. Adopted its Summer National Meeting Minutes

McVey made a motion, seconded by Sanchez, to adopt the Task Force's July 31 minutes (*see NAIC Proceedings – Summer 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 Sept. 24 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 three applications for admittance to the Oct. 1 *Quarterly Listing of Alien Insurers*.

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

3. Discussed the Recognition of RIMS-CRMP for Meeting the Qualified Risk Manager Competency Standard

Commissioner Deiter indicated that a comment letter (Attachment __) was provided by Jeff Klein and Arshawn Teymoorian (McIntyre & Lemon) regarding the recognition of the Risk and Insurance Management Society's (RIMS) Certified Risk Management Professional (CRMP) credential for qualified risk managers. Mark Prysock and Denise Cesario (RIMS) discussed the RIMS-CRMP certification and its significance. They proposed recognizing it as a qualifying credential for meeting the Nonadmitted and Reinsurance Reform Act of 2010 (NRRRA) qualified risk management competency standard.

Dan Schelp (NAIC) commented on two issues with the adopted version of the *Nonadmitted Insurance Model Act* (#870) regarding qualified risk managers. He stated that the first provision to meet the requirement of an exempt commercial purchaser within Model #870, Section 3—Definitions, was inadvertently deleted when the final version was adopted. He also said that Section 3 does not include a definition of a qualified risk manager, and if Model #870 is reopened, consideration should be given to adding such a definition.

Andy Daleo (NAIC) commented that if the Task Force considered reopening Model #870, adding a drafting note may be the best way to address potential changes in designations that are acceptable for a qualified risk manager.

Teymoorian commented that he concurred with the drafting note approach. Klein said that he will work with Schelp and Daleo to determine the states that have adopted Model #870 and include the definition of a qualified risk manager.

Commissioner McVey said further discussion is needed on how to define a qualified risk manager, given the broad scope of existing programs and certifications.

Director Deiter said further discussion will be needed to determine the most advantageous approach to solving these issues.

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 Dec. 3 2025.docx

Model 870 – Nonadmitted Insurance Model Act

Section 3. Definitions

H. “Exempt commercial purchaser” means any person purchasing commercial insurance that, at the time of placement, meets the following requirements:

- (1) The person employs or retains a qualified risk manager to negotiate insurance coverage;
- (2) Has paid aggregate nationwide commercial property and casualty insurance premiums in excess of \$100,000 in the immediately preceding 12 months; and
- (3) (a) Meets at least one of the following criteria:
 - (i) Possesses a net worth in excess of \$20,000,000;
 - (ii) Generates annual revenues in excess of \$50,000,000;
 - (iii) Employs more than 500 full-time or full-time equivalent employees per individual insured or is a member of an affiliated group employing more than 1,000 employees in the aggregate;
 - (iv) Is a not-for-profit organization or public entity generating annual budgeted expenditures of at least \$30,000,000; or
 - (v) Is a municipality with a population in excess of 50,000 persons.
- (b) Effective on July 21, 2010, every five years on January 1, the amounts in Subsections (i), (ii), and (iv) of Section 3H(2)(a) shall be adjusted to reflect the percentage change for such five-year period in the Consumer Price Index for All Urban Consumers published by the Bureau of Labor Statistics of the Department of Labor.



Surplus Lines Task Force Interim Meeting

March 5, 2026

Chair: Director Larry Deiter, SD

Vice-Chair: Glen Mulready, OK





RIMS-Certified Risk Management Professional (RIMS-CRMP)

Denise Osorio, Chief Professional Development Officer

RIMS, the risk management society®



***RIMS Supports 200,000 Risk
Professionals Worldwide***

RIMS MISSION:
RIMS, *the risk management
society*[®], empowers risk
professionals to strengthen
organizational resilience, by
driving strategic decision-
making and improving
business outcomes.

***Members in
Over 60
countries***

Nonadmitted and Reinsurance Reform Act of 2010 (NRRA)

- Exempt Commercial Purchasers (ECPs)
- Qualified Risk Managers (QRMs)
- Qualifying Designations
 - Chartered Property and Casualty Underwriter (CPCU)
 - Associate in Risk Management (ARM)
 - Certified Risk Manager (CRM)
 - *RIMS Fellow (RF) (superseded by the RIMS-CRMP)

*Currently 215 RF holders v. almost 1,900 RIMS-CRMP certification holders

RIMS-CRMP Certification That Commands Respect



- ✓ **Globally Accredited** — Accredited by the ANSI National Accreditation Board (ANAB) under ISO standards for unmatched credibility and global trust.
- ✓ **One of a Kind** — The only risk management certification with ANAB accreditation.
- ✓ **Defines the Discipline** — Sets the global standard for competence, performance, and ethics.
- ✓ **Signals Excellence** — Demonstrates your commitment to the highest professional standards.
- ✓ **Global Network** — 1,900+ certified professionals across 77 countries.
- ✓ **Proven Impact** — Validates real-world expertise and measurable results.



RIMS-CRMP Professional Benefits

“When I meet with my insurance carriers, with my other service providers, they know simply ... by my certification [that] I know risk management. I don't have to spend any time telling them about my qualifications because this certification does that for me.”



—Gloria Brosius, RIMS-CRMP

RIMS-CRMP RECOGNITION

- ✓ Credential certificate
- ✓ “RIMS-CRMP” in signature
- ✓ Digital badge
- ✓ Recognition on website
- ✓ Discounts on RIMS professional development offerings

RIMS-CRMP WILL...

- ✓ Demonstrate your knowledge
- ✓ Differentiate you from others
- ✓ Elevate your status
- ✓ Increase your earning potential



RIMS-CRMP Scope and Competencies Tested

A RIMS-CRMP professional demonstrates proficiency across five core domains:

1. **Analyzing the Organizational Model** – Understand organizational structure, culture, and governance to identify risk vulnerabilities.
2. **Designing Organizational Risk Strategies** – Create risk frameworks, policies, and mitigation plans that align with organizational goals.
3. **Implementing Risk Processes** – Operationalize risk strategies through structured processes and integrated risk management practices.
4. **Developing Organizational Risk Competency** – Build internal expertise, foster a risk-aware culture, and establish performance metrics.
5. **Supporting Decision Making** – Provide data-driven insights and risk guidance to facilitate informed strategic and operational decisions.



RIMS-CRMP Certification Requirements



Education and/or Experience



Competencies Tested



Continuing Education Requirements



Uphold Professional Code of Ethics



Periodic Recertification



How to Earn the RIMS-CRMP Certification

- ✓ **Meet experience and education eligibility requirements**
 - Bachelor's degree *in risk management* + 1 year RM work experience
 - Bachelor's degree *in non risk management area* + 3 years RM work experience
 - Non degree applicants + 6 years RM work experience
- ✓ **Apply online at www.RIMS.org/Certification**
- ✓ **RIMS-CRMP Exam Fee** – \$375 for RIMS members, \$525 for nonmembers
- ✓ **Take the exam** – Pearson VUE testing center or remotely
- ✓ **Time to recertify** – 50 points/hours within a two-year period
- ✓ **Agree to uphold and abide by the RIMS-CRMP code of ethics**



Authority for Additional Qualifying Designations

Under the NRRA, Congress empowered 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.”

15 U.S.C. § 8206(13)(C)(i)(II)(bb)(EE)



Our Ask

Work with staff to amend the existing 2011 Nonadmitted Insurance Reform Sample Bulletin, develop a new model bulletin, or other comparable guidance that accomplishes the following:

- Reminds DOIs of the definition of a qualified risk manager under the NRRA, per the Nonadmitted Insurance Reform Sample Bulletin issued on October 11, 2011.
- Reminds DOIs of their authority under the NRRA, which expressly allows states to recognize “any other designation, certification, or license” demonstrating minimum competency in risk management
- Informs DOIs that the RIMS-CRMP is the direct successor to the RIMS Fellow (RF) designation referenced in the NRRA
- Affirms to DOIs that recognizing the RIMS-CRMP via bulletin or similar guidance is consistent with congressional intent



Helpful RIMS-CRMP Resources & Materials

RIMS-CRMP Overview

<https://www.rims.org/certification/rims-crmp/about>

Certification Handbook

https://www.rims.org/docs/default-source/default-document-library/certification/rims-crmp_handbook_2025_final.pdf?sfvrsn=1422865e_3

Examination Information

<https://www.rims.org/certification/rims-crmp/exam-content>



Questions?

RIMS

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March 3, 2026

Director Larry Deiter, Chair
Surplus Lines Task Force
National Association of Insurance Commissioners

Re: Nonadmitted Insurance Model Act Revisions

Director Dieter and members of the Surplus Lines Task Force:

The Wholesale & Specialty Insurance Association (WSIA) would like to thank the Task Force for identifying recent issues with the most recent iteration of the Nonadmitted Insurance Model Act (Model 870). In addition to addressing the issues identified on the call on December 3rd, WSIA would like to bring an additional issue to the attention of the Task Force so that remedies can be considered.

WSIA supports the recent correction made to Model 870 remedying the error identified by NAIC staff regarding the omission of a requirement to qualify as an Exempt Commercial Purchaser. To our knowledge, omission of the requirement that an Exempt Commercial Purchaser must employ a qualified risk manager, has not adversely affected adoption of Nonadmitted and Reinsurance Reform Act, nor Model 870 adoption within any states.

WSIA is also supportive of the proposal presented by RIMS at the March 5, 2026 Task Force meeting to recognize the RIMS-Certified Risk Management Professional (RIMS-CRMP) as a qualifying credential for Qualified Risk Managers under the Nonadmitted and Reinsurance Reform Act of 2010 (NRRRA). WSIA is supportive of whatever approach the Task Force decides to address this problem.

WSIA would also like to bring to the Task Force's attention an additional provision of Model 870 that poses significant practical compliance challenges for the surplus lines market. Section 5N(5) of Model 870 requires a surplus lines licensee to obtain a signed disclosure from the insured at the time of application and to affix that signed copy to the policy upon delivery. This provision was in place prior to the 2023 revisions to Model 870 and WSIA and our industry partners failed to address it's issues during the drafting process. This outdated requirement has been adopted in very few states, does not align with modern policy delivery and disclosure practices and has the potential to adversely affect surplus lines brokers and insureds. The section reads:

- (5) The surplus lines licensee shall give the following consumer notice to every person, applying for insurance with a nonadmitted insurer. The notice shall be printed in 16-point type on a separate document affixed to the application. The applicant shall sign and date a copy of the notice to acknowledge receiving it. The surplus lines licensee shall maintain the signed notice in its file for a period of five (5) years from expiration of the policy. The surplus lines licensee shall tender a copy of the signed notice to the insured at the time of delivery of each policy the licensee transacts with a nonadmitted insurer. The copy shall be a separate document affixed to the policy.

***“Notice:** A nonadmitted or surplus lines insurer is issuing the insurance policy that you have applied to purchase. These insurers do not participate in insurance guaranty funds. The guaranty funds will not pay your claims or protect your assets if the insurer becomes insolvent and is unable to make payments as promised. For additional information about the above matters and about the*

insurer, you should ask questions of your insurance agent, broker or surplus lines broker. You may also contact your insurance department consumer help line.”

Drafting Note: This notice is intended to inform personal lines customers and smaller commercial risks of the nature of the coverage they are purchasing. A state may wish to add language to this statute providing that this notice need not be given to commercial risks meeting defined criteria for size and insurance expertise.

While WSIA fully supports the principle that insureds should be informed that their policy is placed with a nonadmitted insurer and is not subject to state guaranty fund protection, the Model’s mechanism for delivering that notice creates unnecessary burdens and inefficiencies that ultimately disserve consumers.

The current requirement creates several specific problems:

- The surplus lines broker, who typically has no direct contact with the insured, is required to obtain the insured’s signature, even though it is the retail producer who interacts with the insured, takes the application, discusses coverage options, and delivers the policy.
- The requirement that the signed form be “affixed” to the policy is impractical because the insurer issues the policy, not the surplus lines broker. This requirement defeats automated policy issuance workflows and necessitates manual intervention, increasing the risk that the disclosure will not be delivered at all.
- Requiring the notice at the time of application is premature, as it is often unknown at that stage whether a risk will ultimately be placed in the nonadmitted market. Insureds may apply to multiple admitted and nonadmitted carriers simultaneously using standardized ACORD forms and requiring a signed surplus lines disclosure at application could result in redundant or confusing paperwork that does not accurately reflect the eventual placement.
- Requiring the insured to sign a disclosure prior to binding may create confusion about whether the signature itself constitutes a binding of coverage.

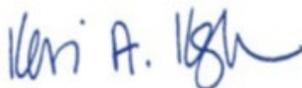
WSIA appreciates the opportunity to bring this issue to the attention of the Task Force. While WSIA does not think it is prudent to re-open Model 870 to another prolonged, comprehensive revision process, we do appreciate the opportunity to bring this issue to the attention of the Task Force to consider options for remedy. WSIA would support a narrow revision to the model that provides appropriate policyholder disclosure with a modern process. A guidance bulletin from the Task Force providing a practical interpretation of the existing requirement would also be a meaningful interim step.

We would again like to thank the Surplus Lines Task Force for their attention to these improvements of Model 870 and we stand ready to work with the Task Force to find solutions to these issues.

Sincerely,



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