NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Draft date: 8/19/26

Virtual Meeting

BLANKS (E) WORKING GROUP
Wednesday, August 26, 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

Roy Eft, Chair	Indiana	Tadd Wegner	Nebraska
Steve Drutz, Vice Chair	Washington	Paul Lupo	New Jersey
David Phifer	Alaska	Tracy Snow	Ohio
Kim Hudson	California	Ryan Rowe	Oklahoma
Wayne Shepherd	Connecticut	Ryan Keeling	Oregon
Nicole Brittingham	Delaware	Diana Sherman	Pennsylvania
N. Kevin Brown	District of Columbia	Shawn Frederick	Texas
Carolina Herrera Wagoner/ Shalice Rivers	Florida	Jake Garn	Utah
		Justin E. Parr	West Virginia
Daniel Mathis	Iowa	Adrian Jaramillo/ Michael Erdman	Wisconsin
Jason Tippett	Michigan		
Danielle Smith/Kelly Hopper	Missouri		

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

AGENDA

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

2. Consider Adoption of Items Previously Deferred—*Roy Eft (IN)*

   A. **2025-29BWG**—Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financial Statements Note 5L – Restricted Assets for reporting funds withheld and modified coinsurance (modco) arrangements. Attachment 2

   B. **2026-10BWG**—Update Life/Fraternal Liability lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value (BACV) and an annual crosscheck to Schedule S. Add reference to use the BACV value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20. Attachment 3

3. Consider Adoption of Items Previously Exposed—*Roy Eft (IN)*

   A. **2026-13BWG Modified**—Add an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state. Attachment 4

   B. **2026-14BWG**—Update Schedule P instructions with revisions exposed at the Casualty Actuarial and Statistical (C) Task Force. Attachment 5

   C. **2026-15BWG Modified**—Update the "CUSIP" column throughout the annual and quarterly investment schedules to be a "Security Identifier" column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. Add a Security ID Type column to the investment schedules to identify what security identifier is being used. Update references to CUSIP throughout the annual and quarterly statements to the security identifier when the instructions are not specifically referring to CUSIP. Attachment 6

   D. **2026-16BWG**—Update the list of disclosure exclusions for Notes to Financial Statements Note #20C to remove investments accounted for under the equity method. Attachment 7

   E. **2026-17BWG**—Update Annual General Interrogatory 25.04 and 25.05 changing "amount of collateral" to "assets lent." Update Notes to Financial Statements Note #5L(1) category "Collateral held under security lending agreements" to "Assets lent under security lending agreements." Attachment 8

4. Consider Exposure of New Items—*Roy Eft (IN)*

   A. **2026-18BWG**—Add an investment characteristic code on Schedule, D, Part 2, Sections 1 and 2 to identify investments that have a rating from a credit rating provider (CRP) that is a Securities Valuation Office (SVO) Excluded Rating (ER). Attachment 9

   B**. 2026-19BWG**—The definition of "qualified health actuary" in the first paragraph of the Actuarial Opinion section of the Health Annual Statement Instructions for the 2027 reporting year. Attachment 10

   C. **2026-20BWG**—Add an interrogatory question to General Interrogatory Part 1, #40 to ask whether a reporting entity has residuals. Attachment 11

5. Consider Adoption of the Editorial Listing—*Roy Eft (IN)* Attachment 12

6. Discuss the NAIC Financial Data Repository (FDR) Modernization Project —*Roy Eft (IN)*

7. Discuss Any Other Matters Brought Before the Working Group
   —Roy Eft (IN)

8. Adjournment

The following documents are being provided as reference materials:

Summary of Comment Letters	Attachment 13
Comment Letters	Attachment 14

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Draft: 7/31/26

Blanks (E) Working Group
E-Vote
July 29, 2026

The Blanks (E) Working Group of the Accounting Practices and Procedures (E) Task Force conducted an e-vote that concluded July 29, 2026. The following Working Group members participated: Roy Eft, Chair (IN); Steve Drutz, Vice Chair (WA); Kim Hudson (CA); N. Kevin Brown (DC); Daniel Mathis (IA); Jason Trippett (MI); Danielle Smith (MO; Tadd Wegner (NE); Paul Lupo (NJ); Ryan Keeling (OR) Shawn Fredrick (TX); Jake Garn (UT); Adrian Jaramillo (WI); and Justin Parr (WV).

1. Adopted the May 28, 2026 Minutes

The Working Group conducted an e-vote to consider adoption of its May 28, 2026 minutes.

Wegner made a motion, seconded by Mathis, to adopt the May 28 minutes (Attachment 1). The motion passed with no objection.

No additional business was addressed.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

DATE: 12/10/2025	**FOR NAIC USE ONLY**
CONTACT PERSON:	Agenda Item # 2025-29BWG
TELEPHONE:	Year 2026
EMAIL ADDRESS:	Changes to Existing Reporting [X]
ON BEHALF OF:	New Reporting Requirement [ ]
NAME: Dale Bruggeman	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
TITLE: Chair SAPWG	No Impact [X]
AFFILIATION: Ohio Department of Insurance	Modifies Required Disclosure [ ]
ADDRESS: 50W. Town St., 3rd Fl., Ste. 300	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]
Columbus, OH 43215	***If Yes, complete question below***
	DISPOSITION
	[ ] Rejected For Public Comment
	[ ] Referred To Another NAIC Group
	[ ] Received For Public Comment
	[ ] Adopted Date ________
	[ ] Rejected Date ________
	[X] Deferred Date 5/28/2026
	[ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual ~~2026~~ 2027 / 1st Quarter ~~2027~~2028

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financials Note 5L – Restricted Assets for reporting funds withheld and modco arrangements.

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

The purpose of this proposal is to add restricted asset codes to Investment Schedule General Instructions for the recently adopted changes to reporting of funds withheld and modco arrangements. (SAPWG Ref #2025-27)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:________

Other Comments:

**** This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, HEALTH & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

Detail Eliminated To Conserve Space

Restricted Asset Code: For the columns that disclose information regarding investments that are not under the exclusive control of the reporting entity, and also including assets loaned to others, the following codes should be used:

LS	–	Loaned or leased to others
RA	–	Subject to repurchase agreement
RR	–	Subject to reverse repurchase agreement
DR	–	Subject to dollar repurchase agreement
DRR	–	Subject to dollar reverse repurchase agreement
C	–	Pledged as collateral – excluding collateral pledged to FHLB
CF	–	Pledged as collateral to FHLB (including assets backing funding agreements)
DB	–	Pledged under an option agreement
DBP	–	Pledged under an option agreement involving "asset transfers with put options"
R	–	Letter stock or otherwise restricted as to sale – excluding FHLB capital stock (Note: Private placements are not to be included unless specific restrictions as to sale are included as part of the security agreement.)
RF	–	FHLB capital stock
SD	–	Pledged on deposit with state or other regulatory body
M	–	Not under the exclusive control of the reporting entity for multiple reasons
SS	–	Short sale of a security
CX	–	Collateral assets received and on the balance sheet, excluding collateral held under security lending and repurchase agreements reported on the balance sheet
MR	–	Assets held under modco reinsurance agreements
FWR	–	Assets held under funds withheld reinsurance agreements
O	–	Other

QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL, PROPERTY, HEALTH & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

Detail Eliminated To Conserve Space

Restricted Asset Code: For the Columns that disclose information regarding investments that are not under the exclusive control of the reporting entity, and also including assets loaned to others, the following codes should be used:

LS	–	Loaned or leased to others
RA	–	Subject to repurchase agreement
RR	–	Subject to reverse repurchase agreement
DR	–	Subject to dollar repurchase agreement
DRR	–	Subject to dollar reverse repurchase agreement
C	–	Pledged as collateral – excluding collateral pledged to FHLB
CF	–	Pledged as collateral to FHLB (including assets backing funding agreements)
DB	–	Placed under an option agreement
DBP	–	Placed under an option agreement involving "asset transfers with put options"
R	–	Letter stock or otherwise restricted as to sale – excluding FHLB capital stock (Note: Private placements are not to be included unless specific restrictions as to sale are included as part of the security agreement)
RF	–	FHLB capital stock
SD	–	Placed on deposit with state or other regulatory body
M	–	Not under the exclusive control of the insurer for multiple reasons
SS	–	Short sale of a security
CX	–	Collateral assets received and on the balance sheet, excluding collateral held under security lending and repurchase agreements reported on the balance sheet
MR	–	Assets held under modco reinsurance agreements
FWR	–	Assets held under funds withheld reinsurance agreements
O	–	Other

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

DATE: 3/26/2026	**FOR NAIC USE ONLY**
CONTACT PERSON:	Agenda Item # 2026-10BWG
TELEPHONE:	Year 2026
EMAIL ADDRESS:	Changes to Existing Reporting [X]
ON BEHALF OF:	New Reporting Requirement [ ]
NAME: Kevin Clark	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
TITLE: Chair SAPWG	No Impact [X] Modifies Required Disclosure [ ]
AFFILIATION: Iowa Insurance Division	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
ADDRESS:	**DISPOSITION**
	[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [ ] Received For Public Comment [ ] Adopted Date [ ] Rejected Date [X] Deferred Date 5/28/2026 [ ] Other (Specify)

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual ~~2026~~2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Life/Fraternal Liability Lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value and an annual crosscheck to Schedule S. Also add reference to use the book/adjusted carrying value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20.

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

The purpose of this proposal is address inconsistent guidance regarding the valuation of the liability for funds withheld in a life or health reinsurance agreement. (SAPWG Ref. 2026-02)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:

Other Comments:

** **This section must be completed on all forms.** **Revised 11/17/2022**

LIABILITIES, SURPLUS, AND OTHER FUNDS

Detail Eliminated To Conserve Space

Line 24.03 – Funds Held Under Reinsurance Treaties with Unauthorized and Certified Reinsurers

~~Total amount from~~Report the total book/adjusted carrying value of the funds withheld assets for unauthorized and certified reinsurers. This should match Schedule S, Part 4 (Columns 12 and 13) plus Schedule S, Part 5 [(Columns 20 and 21) x 1000), (other than amounts of letters of credit or trust agreements included therein)] to the extent that such funds were included as a part of the total assets on Page 2 of the statement and were not offset by a directly related credit offset on Page 2.

Detail Eliminated To Conserve Space

Line 24.07 – Funds Held Under Coinsurance

Report the amount of funds withheld from reinsurers under coinsurance treaties other than amounts reported on Line 24.03. The total amount of the book adjusted carrying of the funds withheld assets (for amounts not related to unauthorized or certified reinsurers) should match Schedule S, Part 3, Section 1 (Column 15) plus Schedule S, Part 3, Section 2 (Column 14) x 1000 (other than amounts of credit or trust agreements included therein) to the extent that such funds were included as a part of the total assets on Page 2 of the statement and were not offset by a directly related credit on Page 2.

SCHEDULE S – PART 3 – SECTION 1

REINSURANCE CEDED LIFE INSURANCE, ANNUITIES, DEPOSIT FUNDS, AND OTHER LIABILITIES WITHOUT LIFE OR DISABILITY CONTINGENCIES, AND RELATED BENEFITS LISTED BY REINSURING COMPANY AS OF DECEMBER 31, CURRENT YEAR

Detail Eliminated To Conserve Space

Column 15 – Funds Withheld Under Coinsurance

Report the book/adjusted carrying value of the amount of funds withheld on coinsurance contracts.

SCHEDULE S – PART 3 – SECTION 2

REINSURANCE CEDED ACCIDENT AND HEALTH INSURANCE LISTED BY REINSURING COMPANY
AS OF DECEMBER 31, CURRENT YEAR

Detail Eliminated To Conserve Space

Column 14 – Funds Withheld Under Coinsurance

Report the book/adjusted carrying value of the amount of funds withheld on coinsurance contracts.

SCHEDULE S – PART 4

REINSURANCE CEDED TO UNAUTHORIZED COMPANIES

Detail Eliminated To Conserve Space

Column 12 – Funds Deposited By and Withheld From Reinsurers

Include: Where permissible to be taken as credit against the loss and reserve liabilities in Column 8, amounts deposited by the reinsurer with or for the reporting insurance company, letters of credit, and trust agreements. Securities withheld from the reinsurer or held on deposit should be valued at the book/adjusted carrying value of the funds held by the ceding entity. ~~or~~ Funds held in a trust fund should be valued at fair ~~market~~ value.

~~NAIC-published market values must be used when available.~~ Letters of credit and trust agreements are not to be included in assets or liabilities on Pages 2 or 3 or supporting pages and exhibits.

SCHEDULE S – PART 5

REINSURANCE CEDED TO CERTIFIED REINSURERS

Detail Eliminated To Conserve Space

Column 20 – Funds Deposited by and Withheld from Reinsurers

Include: Where permissible to be taken as credit against the loss and reserve liabilities in Column 14, amounts deposited by the reinsurer with or for the reporting insurance company, letters of credit, and trust agreements. Securities withheld from the reinsurer or held on deposit should be valued at the book adjusted carrying value of the funds held by the ceding entity. ~~or~~ Funds held in a trust fund should be valued at fair ~~market~~ value.

~~NAIC-published market values must be used when available.~~ Letters of credit and trust agreements are not to be included in assets or liabilities on Pages 2 or 3 or supporting pages and exhibits.

QUARTERLY STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

LIABILITIES, SURPLUS AND OTHER FUNDS

Information should be reported as of the end of current quarter.

Detail Eliminated To Conserve Space

Line 24.03 – Funds Held Under Reinsurance Treaties with Unauthorized and Certified Reinsurers

Report the total book/adjusted carrying value of the funds withheld assets for unauthorized and certified reinsurers.

Detail Eliminated To Conserve Space

Line 24.07 – Funds Held Under Coinsurance

Report the amount of funds withheld from reinsurers under coinsurance treaties other than amounts reported on Line 24.03. Report the total amount of the book/adjusted carrying value of the funds withheld assets (for amounts not related to unauthorized or certified reinsurers).

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

	DATE: 5/4/2026	**FOR NAIC USE ONLY** Agenda Item # 2026-13BWG MOD Year 2027 Changes to Existing Reporting [X] New Reporting Requirement [ ]
CONTACT PERSON:	**Andy Daleo**	
TELEPHONE:		
EMAIL ADDRESS:	**adaleo@naic.org**	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT** No Impact [X] Modifies Required Disclosure [ ]
ON BEHALF OF:		
NAME:	**Eli Snowbarger**	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [NO] ****If Yes, complete question below****
TITLE:	**Chief Financial Examiner**	
AFFILIATION:	**Oklahoma Insurance Department**	**DISPOSITION**
ADDRESS:		[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date ____ [ ] Rejected Date ____ [ ] Deferred Date ____ [ ] Other (Specify) ____

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Add an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state.

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

The purpose of the addition of the “Active Status” column to the cyber and flood supplements is to allow a user to determine if the policies are being written in the admitted or nonadmitted market.

IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:

Other Comments:

** **This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS – PROPERTY

CYBERSECURITY INSURANCE COVERAGE SUPPLEMENT
PART 5 – CYBERSECURITY COVERAGE BY STATE

If the reporting entity answers "yes" to Question 4, then Part 5 should be completed. Part 5 should report which state(s) cybersecurity coverage have direct written premium as reported in Parts 2, 3, and 4. No field should be left blank in the table. (Note: Column ~~1~~ 2 – Stand-alone and Column ~~2~~ 3 – Packaged are considered Primary but on Part 5 they are listed separately to see what type of policies are being written.)

Column 1 – Active Status

Use the following codes to identify the reporting entity's status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity's status in the state or territory. ~~Each line must have an entry in order to subtotal Footnote (a).~~

L – Licensed or Chartered (Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.)

R – Registered (Non-domiciled Risk Retention Groups)

E – Eligible (Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile – see DSLI). In some states referred to as nonadmitted.)

Q – Qualified (Qualified or Accredited Reinsurer)

D – DSLI (Domestic Surplus Lines Insurer (DSLI) – Reporting Entities authorized to write Surplus Lines in the state of domicile)

S – Suspended (State licensing status of final and public suspension)

N – None of the above (Not allowed to write business in the state or none of the above codes apply)

Column ~~1~~2 – Stand-alone

If Part 2 is completed, indicate "Yes" in each state's row that has direct written premium reported in Part 2 from cybersecurity coverage issued as a stand-alone policy without additional coverage types (e.g., monoline, non-packed). Otherwise, indicate "No" for each state. Or, if all Part 2 direct written premiums are Packaged (column 2 below), indicate "N/A" for each state.

Detail Eliminated To Conserve Space

Drafting Note – Renumber all remaining columns

PRIVATE FLOOD INSURANCE SUPPLEMENT

GENERAL INSTRUCTIONS – PARTS 2 THROUGH 6

Column 1 – Active Status

Use the following codes to identify the reporting entity's status for each state or territory reported in the schedule as of the end of the reporting period. Enter the code that applies to the reporting entity's status in the state or territory. ~~Each line must have an entry in order to subtotal Footnote (a).~~

L – Licensed or Chartered	(Licensed Insurance Carrier and Domiciled Risk Retention Groups referred to in some states as admitted.)
R – Registered	(Non-domiciled Risk Retention Groups)
E – Eligible	(Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile – see DSLI). In some states referred to as nonadmitted.)
Q – Qualified	(Qualified or Accredited Reinsurer)
D – DSLI	(Domestic Surplus Lines Insurer (DSLI) – Reporting Entities authorized to write Surplus Lines in the state of domicile)
S – Suspended	(State licensing status of final and public suspension)
N – None of the above	(Not allowed to write business in the state or none of the above codes apply)

Column 1 – Direct Written Premium

For Lines 1 through 56, the sum of Parts 2 through 6 should equal Column 1, Line 2.5 of the corresponding Exhibit of Premiums and Losses (State Page) for the state.

For Line 57, the sum of Parts 2 through 6 should equal Column 1, Line 2.5 of the Exhibit of Premiums and Losses (State Page) – Grand Total.

Detail Eliminated To Conserve Space

Drafting Note – Renumber all remaining columns

ANNUAL STATEMENT BLANK - PROPERTY

CYBERSECURITY INSURANCE COVERAGE SUPPLEMENT

PART 5 – CYBERSECURITY COVERAGE BY STATE

State	1 Active Status	~~1~~2 Stand-Alone	~~2~~3 Packaged	~~3~~4 Excess	~~4~~5 Endorsement
1. Alabama AL					
2. Alaska AK					
3. Arizona AZ					
4. Arkansas AR					
5. California CA					
6. Colorado CO					
7. Connecticut CT					
8. Delaware DE					
9. Dist. Columbia DC					
10. Florida FL					
11. Georgia GA					
12. Hawaii HI					
13. Idaho ID					
14. Illinois IL					
15. Indiana IN					
16. Iowa IA					
17. Kansas KS					
18. Kentucky KY					
19. Louisiana LA					
20. Maine ME					
21. Maryland MD					
22. Massachusetts MA					
23. Michigan MI					
24. Minnesota MN					
25. Mississippi MS					
26. Missouri MO					
27. Montana MT					
28. Nebraska NE					
29. Nevada NV					
30. New Hampshire NH					
31. New Jersey NJ					
32. New Mexico NM					
33. New York NY					
34. No. Carolina NC					
35. No. Dakota ND					
36. Ohio OH					
37. Oklahoma OK					
38. Oregon OR					
39. Pennsylvania PA					
40. Rhode Island RI					
41. So. Carolina SC					
42. So. Dakota SD					
43. Tennessee TN					
44. Texas TX					
45. Utah UT					
46. Vermont VT					
47. Virginia VA					
48. Washington WA					
49. West Virginia WV					
50. Wisconsin WI					
51. Wyoming WY					
52. American Samoa AS					
53. Guam GU					
54. Puerto Rico PR					
55. U.S. Virgin Islands VI					
56. Northern Mariana Islands MP					
57. Canada CAN					
58. Aggregate other alien OT					

Attachment 4

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 2

Stand-Alone Residential Private Flood Policies – First-Dollar
Policy and Claims Data

				Direct Losses			Defense and Cost Containment Expense								
States, Etc.	1 Active Status	~~1~~2 Direct Written Premium	~~2~~3 Direct Premium Earned	~~3~~4 Paid (Deducting Salvage)	~~4~~5 Paid + Change in Case Reserves	~~5~~6 Case Reserves	~~6~~7 Paid	~~7~~8 Paid + Change in Case Reserves	~~8~~9 Case Reserves	~~9~~10 Number of Policies In Force End of the Prior Year	~~10~~11 Number of Policies In Force End of the Current Year	~~11~~12 Number of Claims Open Beginning of the Current Year	~~12~~13 Number of Claims Opened During the Reporting Year	~~13~~14 Number of Claims Open the End of Current Year	~~14~~15 Number of Claims Closed with Payment
1. Alabama .... AL														
2. Alaska .... AK														
3. Arizona .... AZ														
4. Arkansas .... AR														
5. California .... CA														
6. Colorado .... CO														
7. Connecticut .... CT														
8. Delaware .... DE														
9. Dist. Columbia .... DC														
10. Florida .... FL														
11. Georgia .... GA														
12. Hawaii .... HI														
13. Idaho .... ID														
14. Illinois IL														
15. Indiana .... IN														
16. Iowa .... IA														
17. Kansas .... KS														
18. Kentucky .... KY														
19. Louisiana .... LA														
20. Maine .... ME														
21. Maryland .... MD														
22. Massachusetts .... MA														
23. Michigan .... MI														
24. Minnesota .... MN														
25. Mississippi .... MS														
26. Missouri .... MO														
27. Montana .... MT														
28. Nebraska .... NE														
29. Nevada .... NV														
30. New Hampshire .... NH														
31. New Jersey .... NJ														
32. New Mexico .... NM														
33. New York .... NY														
34. No. Carolina .... NC														
35. No. Dakota .... ND														
36. Ohio .... OH														
37. Oklahoma .... OK														
38. Oregon .... OR														
39. Pennsylvania .... PA														
40. Rhode Island .... RI														
41. So. Carolina .... SC														
42. So. Dakota .... SD														
43. Tennessee .... TN														
44. Texas .... TX														
45. Utah .... UT														
46. Vermont .... VT														
47. Virginia .... VA														
48. Washington .... WA														
49. West Virginia .... WV														
50. Wisconsin .... WI														
51. Wyoming .... WY														
52. American Samoa .... AS														
53. Guam .... GU														
54. Puerto Rico .... PR														
55. U.S. Virgin Islands VI														
56. Northern Mariana Islands .... MP														
57. Totals														

Attachment 4

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 3

Stand-Alone Residential Private Flood Policies – Excess
Policy and Claims Data

	1	~~1~~2	~~2~~3	Direct Losses			Defense and Cost Containment Expense			~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15
States, Etc.	Active Status	Direct Written Premium	Direct Premium Earned	~~3~~4 Paid (Deducting Salvage)	~~4~~5 Paid + Change in Case Reserves	~~5~~6 Case Reserves	~~6~~7 Paid	~~7~~8 Paid + Change in Case Reserves	~~8~~9 Case Reserves	Number of Policies In Force End of the Prior Year	Number of Policies In Force End of the Current Year	Number of Claims Open Beginning of the Current Year	Number of Claims Opened During the Reporting Year	Number of Claims Open the End of Current Year	Number of Claims Closed with Payment
1. Alabama .... AL															
2. Alaska .... AK															
3. Arizona .... AZ															
4. Arkansas .... AR															
5. California .... CA															
6. Colorado .... CO															
7. Connecticut .... CT															
8. Delaware .... DE															
9. Dist. Columbia .... DC															
10. Florida .... FL															
11. Georgia .... GA															
12. Hawaii .... HI															
13. Idaho .... ID															
14. Illinois IL															
15. Indiana .... IN															
16. Iowa .... IA															
17. Kansas .... KS															
18. Kentucky .... KY															
19. Louisiana .... LA															
20. Maine .... ME															
21. Maryland .... MD															
22. Massachusetts .... MA															
23. Michigan .... MI															
24. Minnesota .... MN															
25. Mississippi .... MS															
26. Missouri .... MO															
27. Montana .... MT															
28. Nebraska .... NE															
29. Nevada .... NV															
30. New Hampshire .... NH															
31. New Jersey .... NJ															
32. New Mexico .... NM															
33. New York .... NY															
34. No. Carolina .... NC															
35. No. Dakota .... ND															
36. Ohio .... OH															
37. Oklahoma .... OK															
38. Oregon .... OR															
39. Pennsylvania .... PA															
40. Rhode Island .... RI															
41. So. Carolina .... SC															
42. So. Dakota .... SD															
43. Tennessee .... TN															
44. Texas .... TX															
45. Utah .... UT															
46. Vermont .... VT															
47. Virginia .... VA															
48. Washington .... WA															
49. West Virginia .... WV															
50. Wisconsin .... WI															
51. Wyoming .... WY															
52. American Samoa .... AS															
53. Guam .... GU															
54. Puerto Rico .... PR															
55. U.S. Virgin Islands VI															
56. Northern Mariana Islands .... MP															
57. Totals															

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 4

Residential Private Flood Policy Endorsements – First-Dollar Policy and Claims Data

	1	~~1~~2	~~2~~3	Direct Losses			Defense and Cost Containment Expense			~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15
States, Etc.	Active Status	Direct Written Premium	Direct Premium Earned	~~3~~4 Paid (Deducting Salvage)	~~4~~5 Paid + Change in Case Reserves	~~5~~6 Case Reserves	~~6~~7 Paid	~~7~~8 Paid + Change in Case Reserves	~~8~~9 Case Reserves	Number of Policies In Force End of the Prior Year	Number of Policies In Force End of the Current Year	Number of Claims Open Beginning of the Current Year	Number of Claims Opened During the Reporting Year	Number of Claims Open the End of Current Year	Number of Claims Closed with Payment
1. Alabama AL															
2. Alaska AK															
3. Arizona AZ															
4. Arkansas AR															
5. California CA															
6. Colorado CO															
7. Connecticut CT															
8. Delaware DE															
9. Dist. Columbia DC															
10. Florida FL															
11. Georgia GA															
12. Hawaii HI															
13. Idaho ID															
14. Illinois IL															
15. Indiana IN															
16. Iowa IA															
17. Kansas KS															
18. Kentucky KY															
19. Louisiana LA															
20. Maine ME															
21. Maryland MD															
22. Massachusetts MA															
23. Michigan MI															
24. Minnesota MN															
25. Mississippi MS															
26. Missouri MO															
27. Montana MT															
28. Nebraska NE															
29. Nevada NV															
30. New Hampshire NH															
31. New Jersey NJ															
32. New Mexico NM															
33. New York NY															
34. No. Carolina NC															
35. No. Dakota ND															
36. Ohio OH															
37. Oklahoma OK															
38. Oregon OR															
39. Pennsylvania PA															
40. Rhode Island RI															
41. So. Carolina SC															
42. So. Dakota SD															
43. Tennessee TN															
44. Texas TX															
45. Utah UT															
46. Vermont VT															
47. Virginia VA															
48. Washington WA															
49. West Virginia WV															
50. Wisconsin WI															
51. Wyoming WY															
52. American Samoa AS															
53. Guam GU															
54. Puerto Rico PR															
55. U.S. Virgin Islands VI															
56. Northern Mariana Islands MP															
57. Totals															

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 5

Residential Private Flood Policy Endorsements – Excess
Policy and Claims Data

				Direct Losses			Defense and Cost Containment Expense								
States, Etc.	1 Active Status	~~1~~2 Direct Written Premium	~~2~~3 Direct Premium Earned	~~3~~4 Paid (Deducting Salvage)	~~4~~5 Paid + Change in Case Reserves	~~5~~6 Case Reserves	~~6~~7 Paid	~~7~~8 Paid + Change in Case Reserves	~~8~~9 Case Reserves	~~9~~10 Number of Policies In Force End of the Prior Year	~~10~~11 Number of Policies In Force End of the Current Year	~~11~~12 Number of Claims Open Beginning of the Current Year	~~12~~13 Number of Claims Opened During the Reporting Year	~~13~~14 Number of Claims Open the End of Current Year	~~14~~15 Number of Claims Closed with Payment
1. Alabama ... AL															
2. Alaska ... AK															
3. Arizona ... AZ															
4. Arkansas ... AR															
5. California ... CA															
6. Colorado ... CO															
7. Connecticut ... CT															
8. Delaware ... DE															
9. Dist. Columbia ... DC															
10. Florida ... FL															
11. Georgia ... GA															
12. Hawaii ... HI															
13. Idaho ... ID															
14. Illinois ... IL															
15. Indiana ... IN															
16. Iowa ... IA															
17. Kansas ... KS															
18. Kentucky ... KY															
19. Louisiana ... LA															
20. Maine ... ME															
21. Maryland ... MD															
22. Massachusetts ... MA															
23. Michigan ... MI															
24. Minnesota ... MN															
25. Mississippi ... MS															
26. Missouri ... MO															
27. Montana ... MT															
28. Nebraska ... NE															
29. Nevada ... NV															
30. New Hampshire ... NH															
31. New Jersey ... NJ															
32. New Mexico ... NM															
33. New York ... NY															
34. No. Carolina ... NC															
35. No. Dakota ... ND															
36. Ohio ... OH															
37. Oklahoma ... OK															
38. Oregon ... OR															
39. Pennsylvania ... PA															
40. Rhode Island ... RI															
41. So. Carolina ... SC															
42. So. Dakota ... SD															
43. Tennessee ... TN															
44. Texas ... TX															
45. Utah ... UT															
46. Vermont ... VT															
47. Virginia ... VA															
48. Washington ... WA															
49. West Virginia ... WV															
50. Wisconsin ... WI															
51. Wyoming ... WY															
52. American Samoa ... AS															
53. Guam ... GU															
54. Puerto Rico ... PR															
55. U.S. Virgin Islands ... VI															
56. Northern Mariana Islands ... MP															
57. Totals															

Attachment 4

PRIVATE FLOOD INSURANCE SUPPLEMENT – PART 6

Commercial Private Flood Policies – First Dollar and Excess
Policy and Claims Data

	1	~~1~~2	~~2~~3	Direct Losses			Defense and Cost Containment Expense			~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15
				~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9						
States, Etc.	Active Status	Direct Written Premium	Direct Premium Earned	Paid (Deducting Salvage)	Paid + Change in Case Reserves	Case Reserves	Paid	Paid + Change in Case Reserves	Case Reserves	Number of Policies In Force End of the Prior Year	Number of Policies In Force End of the Current Year	Number of Claims Open Beginning of the Current Year	Number of Claims Opened During the Reporting Year	Number of Claims Open the End of Current Year	Number of Claims Closed with Payment
1. Alabama .... AL															
2. Alaska .... AK															
3. Arizona .... AZ															
4. Arkansas .... AR															
5. California .... CA															
6. Colorado .... CO															
7. Connecticut .... CT															
8. Delaware .... DE															
9. Dist. Columbia .... DC															
10. Florida .... FL															
11. Georgia .... GA															
12. Hawaii .... HI															
13. Idaho .... ID															
14. Illinois IL															
15. Indiana .... IN															
16. Iowa .... IA															
17. Kansas .... KS															
18. Kentucky .... KY															
19. Louisiana .... LA															
20. Maine .... ME															
21. Maryland .... MD															
22. Massachusetts .... MA															
23. Michigan .... MI															
24. Minnesota .... MN															
25. Mississippi .... MS															
26. Missouri .... MO															
27. Montana .... MT															
28. Nebraska .... NE															
29. Nevada .... NV															
30. New Hampshire .... NH															
31. New Jersey .... NJ															
32. New Mexico .... NM															
33. New York .... NY															
34. No. Carolina .... NC															
35. No. Dakota .... ND															
36. Ohio .... OH															
37. Oklahoma .... OK															
38. Oregon .... OR															
39. Pennsylvania .... PA															
40. Rhode Island .... RI															
41. So. Carolina .... SC															
42. So. Dakota .... SD															
43. Tennessee .... TN															
44. Texas .... TX															
45. Utah .... UT															
46. Vermont .... VT															
47. Virginia .... VA															
48. Washington .... WA															
49. West Virginia .... WV															
50. Wisconsin .... WI															
51. Wyoming .... WY															
52. American Samoa .... AS															
53. Guam .... GU															
54. Puerto Rico .... PR															
55. U.S. Virgin Islands VI															
56. Northern Mariana Islands .... MP															
57. Totals															

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

DATE: 5/13/2026 **CONTACT PERSON:** Kris DeFrain **TELEPHONE:** 816-783-8229 **EMAIL ADDRESS:** kdefrain@naic.org **ON BEHALF OF:** Casualty Actuarial and Statistical (C) Task Force **NAME:** Christian Citarella **TITLE:** Chair of CASTF **AFFILIATION:** New Hampshire Insurance Department **ADDRESS:**	**FOR NAIC USE ONLY** Agenda Item # 2026-14BWG Year 2027 Changes to Existing Reporting [X] New Reporting Requirement [ ] **REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT** No Impact [X] Modifies Required Disclosure [ ] Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [NO] ****If Yes, complete question below**** **DISPOSITION** [ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date ________ [ ] Rejected Date ________ [ ] Deferred Date ________ [ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Schedule P instructions with revisions exposed at the Casualty Actuarial and Statistical (C) Task Force

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

See next page

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: ________

Other Comments:

** **This section must be completed on all forms.** **Revised 11/17/2022**

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

In 2025-07BWG, CASTF proposed editorial revisions to the Schedule P instructions, which were adopted for the 2025 annual statement. The objective was to clarify the instructions, especially the instructions for incurred years prior to the most recent ten. The current proposal continues that project. The proposed changes fall into five categories:

1. **Correcting incorrect information**

   Example: Corrected "Earned premium is on a calendar year basis." in the overview section to "Earned premium is on a calendar year basis in Part 1, an exposure year basis in Part 6, and a policy year basis in Part 7."

2. **Moving content without changing the content**

   Example: Moved the description of the prior row for salvage and subrogation received from the overview section to the Part 1 section because this instruction applies specifically to Part 1.

3. **Making minor improvements**

   Example: Brought the DCC and A&O descriptions into alignment with the current version of SSAP No. 55.

4. **Increasing clarity without changing the meaning**

   Example: Added descriptions for prior year rows and some example exhibits.

5. **Correcting information that used to be true based on old annual statement blanks but is no longer true**

   Example: Deleted "Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported." from this language in the Part 1 section: "Premiums earned and losses paid, unpaid, and incurred should reconcile with the Statement of Income page. Part 1 – Summary is the total of the Schedule P lines. Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported." It looks like the three nonproportional assumed reinsurance lines used to not be shown separately and explicitly in other areas of the annual statement besides Schedule P. (E.g., in the 1994 annual statement blank, the state pages did not have lines for reinsurance, and the Underwriting and Investment Exhibits had four lines for reinsurance [numbered 30A through 30D] that were not further specified beyond "Reinsurance".) But that is no longer true (on, for example, the state pages and the UW&I pages). So it no longer seems necessary to mention summing here.

CASTF exposed the proposed changes for a 45-day comment period ending on 3/26/2026. Five comment letters were received, and changes were made in response to the comments.

SCHEDULE P

1. ~~1.~~ There are seven parts and the interrogatories within Schedule P. Part 1 provides detailed information on losses and loss adjustment expenses. Part 2 provides a history of incurred losses and defense & cost containment (DCC) expenses. Part 3 provides a history of loss and DCC payments. Part 4 provides a history of bulk and incurred but not reported (IBNR) reserves. Part 5 provides a history of claim counts. Part 6 provides a history of premiums earned. Part 7 provides a history of loss sensitive contracts. Schedule P Interrogatories provides for additional calculation and explanation of various amounts.

2. ~~2.~~ Earned premium is on a calendar year basis in Part 1, an exposure year basis in Part 6, and a policy year basis in Part 7. Except in Part 7, which shows policy year experience, l~~L~~osses incurred should be assigned to the year in which the event occurred that triggered coverage under the contract. This may be a date of accident (occurrence policies), a date of report (claims-~~-~~made policies), a policy issue date (tail policies), or a date of discovery (fidelity and surety). Hereafter, this is called the "incurred year."

3. ~~3.~~ Schedule P displays ten years of historical data for all lines of business.

4. ~~4.~~ Report all dollar amounts in Schedule P in thousands of dollars ($000 omitted), by either rounding or truncating. Claim counts should be reported as whole numbers.

5. ~~5.~~ The ~~Except for medical professional liability, other liability and products liability which separately display data for occurrence and claims-made coverages and the reinsurance lines, the~~ lines of business in Schedule P are groupings of the lines of business used on the Exhibit of Premiums and Losses ("state page"). In some cases, the heading of the line of business has been expanded for clarity. Business reported on the Aggregate write-ins for other lines of business line of the ~~Statement of Income and the~~ s~~S~~tate p~~P~~age should be included in the Other Liability sections of Schedule P.

6. ~~6.~~ Data for Annual Statement Line 17.3 – Excess Workers' Compensation should be reported as Other Liability – Occurrence as appropriate for the contractual terms of the policy.

7. ~~7.~~ Schedule P includes only the data for the reporting entity identified on the Jurat page of the Annual Statement. Do not include consolidated data for affiliated companies except in a Combined Annual Statement. If the reporting entity participates in an intercompany pooling agreement, show only its share of the business, not the total for all participants.

8. ~~8.~~ Retroactive reinsurance should not be reflected in Schedule P. The transferor in such an agreement must record, without recognition of the retroactive reinsurance, its loss and loss adjustment expense reserves on a gross basis on its balance sheet and in all schedules and exhibits. The transferee in such an agreement must exclude the retroactive reinsurance from its loss and loss adjustment expense reserves and from its schedules and exhibits.

~~9.~~ 9. Schedule P, Part 1 should be gross of non-tabular discount and net of tabular discount, with the exception of Columns 35 and 36, which are net of all discount. The other parts of Schedule P should be gross of all discounts so that the annual statement user can make effective use of the triangles in Parts 2, 3, and 4. ~~A discount implicit in tabular reserves may be included in Schedule P, Part 1. Schedule P, Part 2 is to be reported gross of ALL discounts. Otherwise, Schedule P is to be presented on a non-discounted basis. Information in Schedule P is to be reported on an undiscounted basis in order to make effective use of the triangles in Parts 2, 3 and 4. The reserves reported are expected to represent the ultimate amounts to be paid, including anticipated inflation. If discounting of loss or loss expense reserves is reflected on any line of Page 3 of this Annual Statement, reconciliation is provided in Schedule P, Part 1.~~ W~~Also, w~~orkpapers relating to any discount amounts must be available for examination upon request. The tabular reserve discount does not need to be shown separately. Discounting is governed by *SSAP No. 65—Property and Casualty Contracts*.

~~10.~~

9.

~~11.~~

~~10. The reserves for unpaid losses and loss adjustment expenses should take into account the explicit or implicit impacts of the various factors affecting claim frequency or ultimate claim cost.~~

10. In those instances where a reporting entity files an amended annual statement as a result of a restatement of previous year earned premium, losses or loss adjustment expenses, Schedule P must be restated and included in the amended annual statement.

The Prior Row:

~~12.~~ ~~11.~~ The "prior" row contains data for all incurred years prior to the most recent 10 years. The calculation of the prior row differs by Part and Section.

~~13.~~

~~14.~~11. ~~12. For salvage and subrogation received on the "prior" row, report losses and expenses paid in the current year.~~

~~In those instances where a reporting entity files an amended annual statement as a result of a restatement of previous year earned premium, losses or loss adjustment expenses, Schedule P must be restated and included in the amended annual statement.~~

Intercompany Pooling:

~~15.~~12. ~~13.~~ Many insurers have an intercompany pooling arrangement with affiliated companies, approved by the domiciliary commissioner, in which the business written is reallocated among the affiliated companies according to a specified percentage. Some affiliated companies may be part of the intercompany pool and some may not, and some lines may be included, and some may not. The premiums and losses are to be reported in Schedule P after such intercompany pooling arrangements, not before. SSAP No. 63 establishes statutory accounting principles for intercompany pools.

~~16.~~13. ~~14.~~ Pooled business ceded is that which, if retained instead of ceded, would be pooled among the affiliated companies ~~who~~ that are party to the intercompany pooling agreement. Any such business that is ceded by the intercompany pool participants to non-pooled companies before the pooling distribution among the participating companies is considered pooled business ceded. Non-pooled business includes all direct, assumed, and ceded business not subject to intercompany pooling, as well as any pooled business that is ceded after the intercompany pooling distribution has been made.

~~17.~~14. ~~15.~~ Direct and Assumed columns include the participation in any intercompany pool. In addition, all direct business not pooled plus assumed business from other than the intercompany pool is to be included. Ceded columns include the company's participation in the intercompany pool such as any ceding by the company to companies independent of the intercompany pool.

15. ~~16.~~ Claim counts should be reported in accordance with the intercompany pooling arrangement and should reflect the company's proportionate share of the total number of claims. If the company's losses are 40% of the intercompany pool, then 40% of the claim count should be reported.

~~18.~~16. Intercompany pooling may cause the numbers reported in Schedule P to not reconcile to other parts of the annual statement. For example, a 0% pool participant will show nothing in Schedule P but could have significant direct business in the Underwriting and Investment Exhibit.

~~19.~~17. ~~17.~~ The pooling percentage is to reflect the company's participation in the intercompany pool as of year-end. When changes to intercompany pooling agreements impact previous ~~accident~~ incurred years, historical data values in Schedule P Parts~~,~~ 1 through 6 should be restated based on the new pooling percentage. This should be done to present meaningful development patterns in Schedule P. When intercompany pooling changes only impact future ~~accident~~ incurred years, no restatement of historical values should be made. Any significant changes in the intercompany pooling arrangements should be reported in the Schedule P Interrogatories. An illustration for reporting pooled business, Exhibit A, follows.

EXHIBIT A

POOLED BUSINESS – SCHEDULE P REPORTING EXAMPLE

This example has been prepared as a clarification of the NAIC *Annual Statement Instructions* to demonstrate how business subject to pooling among affiliated companies should be incorporated in the "Direct + Assumed" and the "Ceded" columns of Schedule P for each affiliated company.

Company A	–	The ~~Flagship~~ lead company; ~~d,~~ does the pooling and cedes some business before pooling.
Company B	–	Cedes some pool business before ceding to Company A for pooling.
Company C	–	Cedes business after pooling.
Company D	–	Cedes nothing except to the pool.

Sample Situation

	Company A	Company B	Company C	Company D	Total
Pool Business:					
1. Direct & Assumed (a)	90,000	15,000	10,000	5,000	120,000
2. Pool Assembly Assumed (Ceded)	25,000	(10,000)	(10,000)	(5,000)	-
3. (Ceded) Before Pooling Dist. (a)	(15,000)(c)	(5,000)(b)	-	-	(20,000)
4. Net Before Pooling Dist.	100,000	-	-	-	100,000
5. Pooling Dist. Assumed (Ceded)	(25,000)	15,000	7,000	3,000	-
6. Net Retained – Amount	75,000	15,000	7,000	3,000	100,000
– Percent Specified	75%	15%	7%	3%	100%
Non-Pool Business:					
7. Direct & Assumed (e)	5,000	4,000	-	-	9,000
8. (Ceded)	(2,000)(e)	(1,000)(e)	(5,000)(d)	-	(8,000)
9. Net	3,000	3,000	(5,000)	-	1,000
Total Business:					
10. Direct & Assumed Before Pooling	95,000	19,000	10,000	5,000	129,000
11. Pool Assembly Assumed (Ceded)	25,000	(10,000)	(10,000)	(5,000)	-
12. (Ceded) Other Than Pooling	(17,000)	(6,000)	(5,000)	-	(28,000)
13. Pooling Dist. Assumed (Ceded)	(25,000)	15,000	7,000	3,000	-
14. Net	78,000	18,000	2,000	3,000	101,000

(a) ~~–~~	Business which, if retained, would be pooled
(b) ~~–~~	Ceded before pool assembly in ~~(~~Line 2~~)~~
~~(c~~(c) ~~)~~ ~~–~~	Ceded before pooling distribution ~~(~~in Line 5~~)~~, before and/or after pool assembly ~~(~~in Line 2~~)~~
(d) ~~)~~ ~~–~~	Ceded after pooling distribution in ~~(~~Line 5~~)~~
(e) ~~)~~ ~~–~~	Business which, if retained, would not be pooled

Schedule P Reporting

Reporting Principle for Intercompany Pool Business – Each company reports its share/percent of the total pooled "Direct + Assumed" and the total pooled "Ceded" business respectively.

Direct + Assumed							
15.	Pool % of Line 1, Total Col.	90,000	18,000	8,400	3,600	120,000
16.	Non-Pooled (Line 7)	5,000	4,000	-	-	9,000
17.	Total	95,000	22,000	8,400	3,600	129,000
(Ceded)						
18.	Pool % of Line 3, Total Col.	(15,000)	(3,000)	(1,400)	(600)	(20,000)
19.	Non-Pooled (Line 8)	(2,000)	(1,000)	(5,000)	-	(8,000)
20.	Total	(17,000)	(4,000)	(6,400)	(600)	(28,000)
21.	Total Net	78,000	18,000	2,000	3,000	101,000

SCHEDULE P – PART 1

1. ~~1.~~ Premiums earned, ~~and~~ losses ~~paid, unpaid, and~~ incurred, and loss adjustment expenses incurred should reconcile with the Statement of Income page. Part 1 – Summary is the total of the Schedule P lines. ~~. Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported.~~

2. ~~2.~~ The columnar headings provide instructions necessary for completion.

   a. ~~a.~~ "Assumed" means reinsurance assumed, including from ~~affiliated~~ intercompany pooling agreements, but excluding any non-proportional reinsurance assumed reported as a separate line and reported accordingly.
   b. ~~b.~~ "Direct" means as directly written, but not if part of an ~~affiliated~~ intercompany pooling agreement.
   c. ~~c.~~ "Ceded" means reinsurance ceded on business so reported as direct or assumed.

3. The number of claims reported is to be cumulative by incurred year. The number of claims reported in each incurred year is equal to the number of open claims at the end of the current year plus cumulative claims closed with or without payment in current and previous calendar years, possibly with adjustments for reopened claims.

~~3.~~4. If the company changes its method of counting claims, the new method should be disclosed in Schedule P Interrogatories, Interrogatory 7.

5. ~~3.~~ Number of Claims Reported, Column 12, applies to Auto Liability (commercial and private passenger), Workers' Compensation, Medical Professional Liability, Homeowners/Farmowners Multiple Peril, Commercial Multiple Peril, Other Liability, Products Liability, Auto Physical Damage and Warranty only. This column may be left blank in all other lines, including the Summary. Reported claim counts are not shown for lines combining different types of coverage, such as Special Liability, Special Property, International, and Nonproportional Assumed Reinsurance. For each year, this Column should include the cumulative number of claims reported through the annual statement date for business subject to intercompany pooling~~ed~~ and business not subject to intercompany ~~non-pooled business~~pooling.

6. Number of Claims Outstanding, Column 25, must be reported for all lines, except Nonp~~n-p~~roportional A~~a~~ssumed R~~r~~einsurance – Property, Liability and Financial Lines.

7. For nonproportional reinsurance, there is no simple way to determine the number of claims ceded or assumed, since the percentage of a claim that is ceded depends on the size of the claim. For this reason, ceded and net claim counts are not shown for any line of business, and assumed claim counts are not shown for nonproportional reinsurance.

~~4.~~8. For reporting entities reporting on a pooling basis, the pooling percentage should be applied to claim count as well as dollar amounts for the business subject to intercompany pooling. Indicate in the Interrogatories whether claim count information is reported per claim or per claimant.

~~5.~~9. ~~4.~~ Cumulative salvage and subrogation received and losses and loss adjustment expenses paid should be reported for each specified incurred year.

~~5.~~ In Schedule P, Part 1, salvage and subrogation received should be reported net of reinsurance, if any. Loss and loss adjustment expense payments are to be reported net of salvage and subrogation received in Schedule P.
10.

~~6.~~

The workpapers that show a reconciliation explaining reinsurance, discounting, and salvage and subrogation adjustments should be available for examination on request.
~~7.~~11.
~~7. Report cumulative amounts paid or received for specific years.~~

~~8.~~12. ~~8.~~ The loss adjustment expenses from the Underwriting and Investment Exhibit, Part 3, are separated into one of two categories: DCC or A&O. ~~DCC expenses are those that are correlated with the loss amounts, and the A&O are as those expenses that are correlated with claim counts or are general loss adjustment expenses. In projecting the necessary reserves for these expenses, actuaries use a different approach for each of the two types of expenses. It is the character of the expenses that is most important, not whether the expenses were internal or external to the reporting entity.~~

~~9.~~13. ~~9.~~ DCC expenses include defense, litigation and medical cost containment expenses, whether internal or external. DCC include, but are not limited to, the following items: ~~"Defense" means defense by the reporting entity in a contentious situation, whether a first party or a third-party claim. The fees charged for reporting entity employees should include overhead, just as an outside firm's charges would include. The expenses exclude expenses incurred in the determination of coverage. These expenses include the following items:~~

- a. ~~a.~~ Surveillance expenses;
- b. ~~b.~~ Fixed amounts for medical cost containment expenses;
- c. ~~c.~~ Litigation management expenses;
- d. ~~d.~~ Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by accident year;
- e. ~~e.~~ Fees or salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in defense of a claim, and fees or salaries for rehabilitation nurses, if such cost is not included in losses;
- f. ~~f.~~ Attorney fees incurred owing to a duty to defend, even when other coverage does not exist; and
- g. ~~g.~~ The cost of engaging experts.

~~10.~~14. ~~10.~~ A&O expenses are loss adjustment expenses other than DCC~~are the remaining loss adjustment expenses~~. These expenses include, but are not limited to, the following items:

- ~~a.~~ ~~a.~~ Fees and expenses of adjusters and settling agents ~~(but not if engaged in a contentious defense)~~;
- ~~b.~~a.
- ~~c.~~ Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by calendar year;
- ~~d.~~b.
- ~~c.~~ Attorney fees incurred in the determination of coverage, including litigation between the reporting entity and the policyholder; ~~and~~
- c.
- ~~d.~~
- d. ~~d.~~ Fees or salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in the capacity of an adjuster; and~~.~~
- e. Adjustment expenses arising from claims related lawsuits such as extra contractual obligations and bad faith lawsuits.

~~11.~~15. ~~11.~~ The foregoing list is not intended to be all-inclusive. R~~We are relying on the r~~eporting entities are to use reasonable judgment in particular situations.

~~12.~~16. ~~12.~~ Reporting entities should assign the DCC expenses to the incurred year in which the associated losses were assigned. Reporting entities may assign the A&O expenses in any justifiable way among the incurred years. The preferred way is to apportion these expenses in proportion to the number of claims reported, closed, or outstanding each year.

~~13.~~17. **~~13.~~** **Please Note:** This instruction is intended solely to give guidance on reporting loss adjustment expenses in Schedule P in the annual statement. It is not intended to provide guidance on the types of expenses to include in loss adjustment expenses. These definitions of DCC expense and A&O expense are not intended to affect insurance or reinsurance agreements or other contractual agreements.

~~14.~~18. ~~14.~~ Column 24 is equal to Column 13 – Column 14 + Column 15 – Column 16 + Column 17 – Column 18 + Column 19 – Column 20 + Column 21 – Column 22.

~~15.~~19. ~~15.~~ Column 28, "Net," equals Column 26 – Column 27, which equals Column 11 + Column 24.

~~16.~~20. ~~16.~~ Columns 32 and 33 require reporting of the discount, if any, as included on any line in Page 3 on liabilities for unpaid losses and loss adjustment expenses, in regard to non-tabular losses and loss adjustment expenses. (See definition of tabular reserves under Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses in the instructions for the Notes to ~~the~~ Financial Statements.) Columns 35 and 36 are the Column 24 unpaid losses and loss adjustment expenses net of the discount in Columns 32 and 33. Columns 35 and 36 must be completed and should agree with net balance sheet reserves after discount. If the reporting entity participates in an intercompany pool and reports on a pooling basis, then the percentage of that pool reported herein should be entered in Column 34. If some of the business is pooled and some is not, leave Column 34 blank and explain in Interrogatory 7.2 of the Schedule P Interrogatories.

~~17.~~21. ~~17.~~ Report in Column 23 the estimated amount of anticipated salvage and subrogation that has been taken as credit (netted) in the reserves for unpaid losses and loss adjustment expenses reported in Column 24. (Note: Column 23 is a memo column only as the amounts contained therein have already been taken into consideration in Columns 13 through 20.)

~~**a. Non-proportional assumed reinsurance – Property Reinsurance**~~

~~Includes all the following lines: Fire, Allied Lines, Ocean Marine, Inland Marine, Pet Insurance Plans, Earthquake, Group Accident and Health, Credit Accident and Health, Other Accident and Health, Auto Physical Damage, Boiler and Machinery, Burglary and Theft and International (of the foregoing).~~

~~**b. Non-proportional assumed reinsurance – Liability**~~

~~Includes all the following lines: Farmowners Multiperil, Homeowners Multiperil, Commercial Multiperil, Medical Professional Liability, Workers' Compensation, Other Liability, Products Liability, Auto Liability, Aircraft (all peril) and International (of the foregoing).~~

~~**c. Non-proportional assumed reinsurance – Financial**~~

~~Includes all the following lines: Financial Guaranty, Fidelity, Surety, Credit, and International (of the foregoing).~~

~~18.~~22. The definitions of the named~~s~~ lines are the same as used on the s~~S~~tate p~~P~~age~~s~~.

~~19.~~23. ~~19.~~ All proportional reinsurance must be allocated to appropriate lines.

~~20.~~24. ~~20.~~ As used in this instruction "non-proportional reinsurance" means reinsurance in excess of retention by the ceding company, and "proportional reinsurance" means fixed percentage of all losses.

~~21.~~25. ~~21.~~ For contracts that afford both proportional and non-proportional reinsurance, allocate premiums and losses to their component parts.

~~The~~ Prior Row:

~~22. Row 1 "Prior" row, Columns 4 through 11, should only reflect amounts paid or received in the current calendar year.~~

26. In the prior row for losses and loss adjustment expenses paid and salvage and subrogation received (columns 4 through 10), report only losses and loss adjustment expenses paid and salvage and subrogation received in the current calendar year for all incurred years prior to the most recent ten years.

27. Column 4 - 5 + 6 - 7 in the prior row equals column 10 - 9 in the Part 3 prior row.

28. The unpaid losses and loss adjustment expenses on the prior row are the unpaid losses and loss adjustment expenses as of the annual statement date for all incurred years prior to the most recent ten years.

29. The prior row should show the number of claims outstanding in the Summary and for all lines except Nonproportional Assumed Reinsurance – Property, Liability and Financial Lines. This row equals the number of claims outstanding as of the annual statement date for all incurred years prior to the most recent ten years.

~~22.~~30. There is no reporting required on the prior row for earned premiums, incurred loss and loss adjustment expenses, loss and loss adjustment expense percentages, number of claims reported, or the intercompany pooling participation percentages.

SCHEDULE P – PARTS 1H and 1RA ~~THROUGH 1U~~

~~1. Reporting entities should complete Schedule P in thousands only but must report all claim counts in whole numbers.~~

~~2. The number of claims reported is to be cumulative by incurred year. The number of claims reported in each incurred year is equal to the number of open claims at the end of the current year plus cumulative claims closed with or without payment for current and previous calendar years.~~

~~3. If the Company changes its method of counting claims, the new method should be disclosed in Schedule P Interrogatories, Interrogatory 6.~~

~~1. Products Liability must be reported separately from Other Liability throughout the statement. This requires that companies separate and restate amounts previously reported as "Other Liability" into the appropriate parts of Schedule P and fully disclose amounts pertaining to "Products Liability."~~

~~2.~~1. "Claims-made Earned Premiums" shall include earned premiums arising from any policy where the predominant exposure is claims-made, but "Claims-made Earned Premiums" shall not include "Tail Earned Premiums."

~~3.~~2. "Occurrence Earned Premiums" are all premiums~~,~~ which are not claims-made.

~~4.~~3. "Tail Earned Premiums" applicable to a claims-made insurance program are to be included in the occurrence Part for the respective line.

~~5.~~4. The following rules apply to accounting for claims-made losses:

a. The "incurred" date shall be the report date for losses attributable to claims-made (but not "tail" forms).

b. Losses shall be booked to the report year that is consistent with the report year definition contained in the policy.

~~6.~~5. The rule for accounting for losses incurred on tail policies is that such losses must be assigned to the year in which the policy was issued and are to be included in the Occurrence Part for the respective line.

~~10. Report in Column 23 the estimated amount of anticipated salvage and subrogation that has been taken as credit (netted) in the reserves for unpaid losses and loss adjustment expenses reported in Column 24. (Note: Column 23 is a memo column only as the amounts contained therein have already been taken into consideration in Columns 13 through 20.)~~

~~11. In Column 28, "Net," the amount should equal Column 26 – Column 27, which equals Column 11 + Column 24.~~

~~**The Prior Row:**~~

~~12. For the "prior" row, report amounts paid or received in current year only. Report cumulative amounts paid or received for specific years. Report loss payments net of salvage and subrogation received.~~

SCHEDULE P – PARTS 2, 3, AND 4

1. Schedule P, Part 2 provides a summary of the loss and DCC expense values over time and may be used to review the ~~loss and expense development overview to test the~~ adequacy of the reporting entity's reserves. Schedule P, Part 3 shows the payment patterns for cash flow projections, discounting calculations, and actuarial projections. Schedule P, Part 4 is an exhibit showing the historical bulk and IBNR reserves as reported. ~~Part 4 does not show a development of these reserves, and it will not, by itself, provide a test of the adequacy of these reserves.~~

2. Schedule P, Parts 2, 3 and 4 have parallel formats and are the basic exhibits for actuarial and financial analyses. The same Line Titles that applied to Schedule P, Part 1 also apply to Parts 2, 3 and 4.

   a. ~~a.~~ All dollar amounts in Schedule P, Parts 2, 3, and 4 are reported net of reinsurance. Claim count information in Part 3 should be on a direct and assumed basis.

   ~~a.~~b. Parts 2 and 3 show cumulative amounts by incurred year.

   ~~b.~~c. All amounts are to be reported net of salvage and subrogation paid and anticipated.

   ~~c.~~d. All amounts in Parts 2 and 4 must be reported gross of both tabular and non-tabular discounting.

   ~~d.~~e. ~~d.~~ In P~~p~~art 2, the "Development" in Column 11 and 12 should be the current year less the first previous year (for 1-year development) or second previous year (for 2-year development), showing the (redundant) or adverse development.

   ~~e. Report all amounts in thousands of dollars ($000 omitted), by either rounding or truncating.~~

Part 3 Claim Counts:

3. The claim counts in Columns 11 and 12 of Part 3 should be reported for Auto Liability (commercial and private passenger), Workers' Compensation, Medical Professional Liability, Homeowners/Farmowners Multiple Peril, Commercial Multiple Peril, Other Liability, Products Liability, Auto Physical Damage and Warranty only.

Loss Adjustment Expenses:

4~~3~~. The triangles include only the DCC ~~loss adjustment~~ expenses. The reason for this is that DCC ~~adjustment~~ expenses correlate with loss amounts, but the A&O expenses do not.

Bulk and IBNR Reserves:

5~~4~~. The b~~B~~ulk and IBNR reserves for losses and DCC expenses in Part 4 are intended to include reserves for incurred but not reported claims, ~~for~~ reopened claims, ~~for~~ development on case reserves of reported claims, and ~~for~~ aggregate reserves on newly reported claims without specific case reserves. The b~~B~~ulk and IBNR reserves in Part 4 are ~~the actuarially determined reserves and are~~ included in the losses unpaid and ~~loss~~ DCC expenses unpaid reported in Schedule P, Parts 1 and 2. The bulk and IBNR reserves do not include case reserves established on individual claims.

6~~5~~. The bulk and IBNR~~se~~ reserves in Part 4 include ~~provision for~~ DCC expenses, unlike the reserves reported in the Underwriting and Investment Exhibit, Part 2A.

~~The~~ Prior Row:

7. ~~6. In~~ Part 2, Line 1, Column 1~~,~~ should show ~~include~~ the loss and DCC expense reserves (case + bulk + IBNR) as of December 31 of the year in the column heading for all incurred years prior to the year in the column heading. For example, if the year in Column 1 is 20XX, Line 1 of Column 1 should show the loss and DCC expense reserves as of December 31, 20XX for incurred years 20XX-1 and prior. ~~previously reported at year-end of the last year for all accident years before the last year.~~

The subsequent development each year across Line 1 ~~will~~ relates to these~~se~~ reserves. For example, Column 2 of Line 1 shows the loss and DCC expense payments in calendar year 20XX+1 on incurred years 20XX-1 and prior plus the reserves (case + bulk + IBNR) as of year-end 20XX+1 on incurred years 20XX-1 and prior. Column 3 shows the payments in calendar years 20XX+1 and 20XX+2 on incurred years 20XX-1 and prior plus the reserves (case + bulk + IBNR) as of year-end 20XX+2 on incurred years 20XX-1 and prior. ~~and will show the subsequent payments and outstanding reserves.~~

This example shows how to calculate the Part 2, Line 1, Column 1 value for the 2024 annual statement. This calculation uses information from Parts 2 through 4 of the 2023 annual statement.

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 2
Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End ($000 Omitted)

Years in Which Losses Were Incurred	1 2014	2 2015	3 2016	4 2017	5 2018	6 2019	7 2020	8 2021	9 2022	10 2023
1. Prior		830,000								
2. 2014		430,000								

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 3
Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year End ($000 Omitted)

Years in Which Losses Were Incurred	1 2014	2 2015	3 2016	4 2017	5 2018	6 2019	7 2020	8 2021	9 2022	10 2023
1. Prior		180,000								
2. 2014		150,000								

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 4
Bulk and IBNR Reserves on Net Losses and Defense and Cost Containment Expenses Reported at Year End ($000 Omitted)

Years in Which Losses Were Incurred	1 2014	2 2015	3 2016	4 2017	5 2018	6 2019	7 2020	8 2021	9 2022	10 2023
1. Prior		420,000								
2. 2014		210,000								

Annual Statement for the Year 2024 of the XYZ Insurance Company
Schedule P – Part 2
Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End ($000 Omitted)

Years in Which Losses Were Incurred	1 2015	2 2016	3 2017	4 2018	5 2019	6 2020	7 2021	8 2022	9 2023	10 2024
1. Prior	**930,000**									
2. 2015										

Case reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
830,000 + 430,000 – (180,000 + 150,000) – (420,000 + 210,000) = 300,000

Bulk and IBNR reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
420,000 + 210,000 = 630,000

Case and bulk and IBNR reserves on net losses and DCC expenses for incurred years 2014 and prior as of 12/31/15:
300,000 + 630,000 = **930,000**

The Part 2, Line 1, Column 1 value in the current year's annual statement (930,000) equals:
Part 2, Line 1, Column 2 in the prior year's annual statement (830,000)
\+ Part 2, Line 2, Column 2 in the prior year's annual statement (430,000)

- Part 3, Line 1, Column 2 in the prior year's annual statement (180,000)
- Part 3, Line 2, Column 2 in the prior year's annual statement (150,000).

~~7.~~

8. In Part 3, Line 1, Column 1, the amount entered should always be ~~"~~zero.*~~"~~ In Line 1, Column 2, the amount should be the loss and DCC expense payments made in that calendar year on the reserves reported in Part 2, Line 1, Column 1. (These payments ~~should~~ are also ~~have been~~ included in Part 2, Line 1, Column 2.) For example, if the year in Column 1 is 20XX, Column 2 of Line 1 shows the loss and DCC expense payments in calendar year 20XX+1 on incurred years 20XX-1 and prior. Column 3 shows the payments in calendar years 20XX+1 and 20XX+2 on incurred years 20XX-1 and prior. ~~In Line 1, Column 3, the amount should be the loss and expense payments made in that year and the preceding year on the reserves reported in Part 2, Line 1, Column 2.~~ (These payments ~~should~~ are also ~~have been~~ included in Part 2, Line 1, Column 3.) Columns 4 through 10 should continue to cumulate the payments in the same way and tie into the Part 2 "prior" row.

**Line 1 only shows payments made subsequent to the establishment of reserves as of the earliest evaluation date in the table. For example, in the 2024 annual statement, the earliest evaluation date is year-end 2015, and Part 3 only shows payments made subsequent to the establishment of reserves as of year-end 2015. This explains why the amount in Line 1, Column 1 of Part 3 has to be zero, since there can be no payments made in 2015 subsequent to the establishment of reserves as of year-end 2015.*

~~8.~~

~~7.~~9. Part 4, Line 1 shows the bulk and IBNR reserves at each year-end (using the year in the column heading) for all incurred years prior to the most recent 10. For example, if the year in Column 1 is 20XX, Line 1 of Column 1 should show the loss and DCC expense bulk and IBNR reserves as of December 31, 20XX for incurred years 20XX-1 and prior.~~In Part 4, Row 1, Column 1, the amount entered should be the bulk and IBNR that was included in Part 2, Row 1, Column 1, (which should equal the case reserves plus the bulk and IBNR). In fact, the entire Row 1 should be the bulk and IBNR included in Part 2, Row 1.~~

~~9. The "prior" row can be reconciled with the immediately preceding year's Annual Statement by breaking down the accident years in the preceding Annual Statement and properly summing the parts.~~

SCHEDULE P – PART 5

1. ~~1. Part 5 is a reporting of claim count information in one location, all of which should have been reported in the current or previous Annual Statements.~~ Part 5, Section 1 shows the cumulative number of claims closed with loss payment. Column 10 of Part 5, Section 1 ties to Column 11 of Part 3, except for the values in the Prior Row~~, as previously reported in Part 3, Column 11~~. Lines 3 through 11 of Column 11 of Part 3 of the prior year's Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 1 of the current Schedule P. Similarly, Part 3 of older years' Schedule P maps to Columns 1 through 8 of the current year's Part 5, Section 1.

2. Part 5, Section 2 shows the number of claims outstanding as of the year-end in the column header. Column 10 of Part 5, Section 2 ties to Column 25 of Part 1. Lines 3 through 11 of Column 25 of Part 1 of the prior year's Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 2 of the current Schedule P. Similarly, Column 25 of Part 1 of older years' Schedule P maps to Columns 1 through 8 of the current year's Part 5, Section 2.~~, as previously reported in Part 1, Column 25, for all years, since this information has always been required in Schedule P.~~

~~1.~~3. Part 5, Section 3 shows the cumulative number of claims reported. Column 10 of Part 5, Section 3 ties to Column 12 of Part 1, except for the Prior Row. Lines 3 through 11 of Column 12 of Part 1 of the prior year's Schedule P tie to Lines 2 through 10 of Column 9 of Part 5, Section 3 of the current Schedule P. Similarly, Part 1 of older years' Schedule P maps to Columns 1 through 8 of the current year's Part 5, Section 3.~~, as previously reported in Part 1, Column 12.~~

~~2.~~4. All claim count information reported in Schedule P should be on a "direct and assumed" basis~~ and should reconcile~~. "Direct and assumed" means direct business not subject to intercompany pooling, plus the company's proportionate share ~~proportion of a pool~~of the total number of pooled claims, plus assumed from other than the intercompany pool

~~plus proportional reinsurance assumed~~. Assumed claim counts on proportional reinsurance arrangements should use the same proportion as losses.~~The same percentage used for dollar amounts should also be used for the claim counts.~~

~~The~~ Prior Row:

~~3.~~5. ~~3.~~ In Section 1, the Prior Row should show the number of claims closed with loss payment in the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years.
~~each respective year for prior years.~~

~~4.~~6. ~~4.~~ In Section 2, the Prior Row should show the number of claims outstanding as of the year-end in the column header~~in each respective year for prior years~~ for all incurred years prior to the most recent 10 years.~~.~~

~~5.~~7. In Section 3, the Prior Row should show the number of claims reported in the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years. ~~in each respective year for prior years.~~ Even though Schedule P, Part 1, Column 12, does not require prior row information, reporting entities should have this information available. If not, reasonable estimates should be made.

SCHEDULE P – PART 6

1. ~~1.~~ For Schedule P, Part 6, the premiums to be reported are exposure or coverage year cumulative earned premiums, recalculated each subsequent year to reflect audits, retrospective adjustments based on loss experience, accounting lags, etc. Mechanically, the written premium file would be restated and the earned premium calculation repeated each year. Premium adjustments for policy periods that cover more than one calendar year should be proportionately distributed between the calendar years covered by the policy period.

For example (adapted from Feldblum's "Completing and Using Schedule P," eighth edition, June 2003), suppose that a retrospectively rated workers' compensation policy is issued on October 1, 2013, for a one-year term and $10,000 premium. On December 15, 2014, the payroll audit calls for an additional $1,000 of premium. On July 1, 2015, the first retrospective adjustment calls for no additional or return premium. On July 1, 2016, the second retrospective adjustment calls for an additional premium of $5,500. Part 6 for this policy, through December 31, 2016, would be completed as follows:

Annual Statement for the Year 2022 of the XYZ Insurance Company
Schedule P – Part 6
Cumulative Premiums Earned Direct and Assumed at Year End

Years in Which Premiums Were Earned and Losses Were Incurred	1 2013	2 2014	3 2015	4 2016	…
1. Prior					
2. 2013	2,500	2,750	2,750	4,125	
3. 2014		8,250	8,250	12,375	
…					
13. Earned Premiums (Sch P-Pt. 1)	2,500	8,500	0	5,500	

- At December 31, 2013, the exposure year 2013 earned premium is $2,500 (=$10,000 x 0.25).
- At September 30, 2014, the exposure year 2013 earned premium is $2,500, and the exposure year 2014 earned premium is $7,500 (=$10,000 x 0.75).
- The payroll audit is distributed over the policy term, so on December 31, 2014, the exposure year 2013 earned premium is $2,750 (=$2,500 + 0.25 x $1,000) and the exposure year 2014 earned premium is $8,250 (=$7,500 + 0.75 x $1,000).

- The retrospective premiums are allocated to exposure years in proportion to the coverage period. At December 31, 2016, the exposure year 2013 earned premium is $4,125 (=$2,750 + 0.25 x $5,500) and the exposure year 2014 earned premium is $12,375 (=$8,250 + 0.75 x $5,500).

2. The objective is to develop earned premiums by ~~calendar~~ exposure year of coverage consistent with the loss and DCC expense by incurred year. ~~Only accident years 1993 and subsequent must be reported.~~ The difference between Sections 1 and 2 should equal the total net earned premiums.

3. A further objective is to determine a more accurate loss and DCC expense ratio and to be able to project the earned but unbilled premiums, which may be an asset or liability. The reporting entity may use any method to recalculate the premiums~~,~~ which will achieve this objective.

4. Column 11 is for informational purposes and shows the distribution of premiums earned during the current year ~~for the prior years~~. Premiums as reported in Schedule P, Part 1, Columns 1 or 2, are also shown at the bottom of the exhibit to demonstrate the relationship and to show how Part 6 reconciles with Part 1.

5. The layout of Sections 1 and 2 is the same. Section 1 shows direct and assumed premiums, while Section 2 shows ceded. ~~same features are applicable for Section 2 on ceded business.~~

6. NOTE: Purchased tail coverage policies are issued in the year that the coverage is effective. Free extended tail coverage is issued in the year the coverage is triggered.

~~The~~ Prior Row:

7. The Prior Row should show the incremental earned premium adjustment in ~~each~~ the calendar year corresponding to the column header for all incurred years prior to the most recent 10 years~~respective year for prior years~~. For Columns 1 through 9, the value in Row 1 for the column corresponding to year 20XX can be determined from the previous year's Schedule P, Part 6 as the sum of Rows 1 and 2 for the column corresponding to year 20XX minus Row 2 for the column corresponding to year 20XX-1.~~prior experience years (columns), Row 1 for a particular year of experience (x) can be determined from the prior year's Schedule P, Part 6, as the sum of Rows 1 plus 2 for experience year (x) (column) minus Row 2 for the preceding year (x-1).~~

SCHEDULE P – PART 7

1. Only the experience on contracts that meet the following definition should be included in Part 7.

   Loss sensitive contracts shall meet the following criteria:

   a. Contracts where an increase in losses on a policy can cause an increase in net payment (by the insured) for that policy.

   b. The amount of additional payment (by the insured) must be at least 75% (50% for reinsurance contracts) of the additional losses, before application of aggregate and per accident/claimant limits or caps.

   c. The net amount paid (by the insured) must also be able to differ by at least 20% (10% for reinsurance contracts), from highest to lowest possible charge in reaction to the loss experience.

   d. The maximum possible payment by the insured should also be at least 15% (7.5% for reinsurance contracts) above what the insured would pay based on expected loss experience. In other words, the maximum charge should not approximate the expected charge.

   e. The additional payment shall be in the form of additional premiums or additional commissions.

   f. The additional losses and corresponding payments must flow through the income and balance sheets and cannot be "off-balance sheet." For example, a deductible feature does not make a contract "loss sensitive" under this definition, as neither the losses under the deductible nor the reimbursements for these losses flow through the income statement.

2. Part 7 is only required of reporting entities who claim a reduction in their Risk-Based Capital for Loss Sensitive Contracts. Such reporting entities must complete the entire schedule in each year that they claim such credit.

3. Part 7A provides experience on primary contracts. Part 7B provides experience on reinsurance contracts.

Section 1: Current Year Loss and LAE Reserves and Net Written Premium:

4. Column (1) should agree with the net loss and loss adjustment expense reserves (undiscounted) reported in the corresponding Part 1 of Schedule P.

5. Column (2) should reflect the corresponding values for Loss Sensitive Contracts only. Primary Loss Sensitive should include direct losses and expenses unpaid less reinsurance on those direct losses and expenses. Reinsurance Loss Sensitive should include unpaid assumed losses and expenses less any retrocessions on those losses and expenses.

6. Column (4) x 1000 should agree with the net written premiums reported in the ~~Statement of Income page~~Underwriting and Investment Exhibit.

7. Column (5) should reflect the corresponding premium for Loss Sensitive Contracts only. Primary Loss Sensitive should include direct premiums written on loss sensitive contracts less reinsurance on those direct premiums. Reinsurance Loss Sensitive should include assumed loss sensitive premiums less any retroceded premiums.

8. Columns (3) and (6) are ratios of (2) to (1) and (5) to (4), respectively. Express as percentages showing one decimal place (e.g., 24.2%).

Sections 2 and 3: Loss Development:

9. In each row of Section 2 display the reported estimate of ultimate losses and DCC expense on all Loss Sensitive Contracts issued (i.e., with inception dates) in that year. Each reported estimate should be the estimate of cumulative ultimate loss and DCC e~~E~~xpense as of ~~each~~ the calendar year-end corresponding to the column header, not the incremental amounts incurred during each calendar year. The resulting data should display the reported estimate of ultimate losses and DCC e~~E~~xpense on a p~~P~~olicy y~~Y~~ear basis.

   One reasonability benchmark that can be used to verify that the data is presented on a p~~P~~olicy y~~Y~~ear basis is to compare the magnitude of an issue year's ultimate loss and DCC e~~E~~xpense estimates as of twelve months and as of twenty-four months. The valuation as of twenty-four months should be approximately twice as great as the valuation as of twelve months. (For example, the Issue Y~~y~~ear 2004 estimate of ultimate losses and DCC e~~E~~xpense at year-end 2005 should be approximately twice as great as the estimate of Issue Year 2004 ultimate losses and DCC e~~E~~xpense at year-end 2004.) This reasonability benchmark assumes roughly even policy writings throughout the year. If a company's writings are proportionately greater in the first half of the year than the second half of the year, the valuation as of twelve months can reasonably be expected to be greater than 50% of the twenty-four-month valuation.

10. In each row of Section 3 show the bulk and IBNR reserves included in Section 2.

Sections 4 and 5: Premium Development:

11. In Section 4 of Schedule P for each year of issue, display the net earned premiums reported as of the calendar year-end corresponding to the column header~~at the end of each calendar year~~. Each reported estimate should be the estimate of cumulative net earned premium as of each year-end, not the incremental amounts earned during each calendar year. The resulting data should display the reported estimate of net earned premium on a p~~P~~olicy y~~Y~~ear basis.

    One reasonability benchmark that can be used to verify that the data is presented on a p~~P~~olicy y~~Y~~ear basis is to compare the magnitude of an issue year's net earned premium as of twelve months and as of twenty-four months. The valuation as of twenty-four months should be approximately twice as great as the valuation as of twelve months. This reasonability benchmark assumes roughly even policy writings throughout the year. If a company's writings are proportionately greater in the first half of the year than the second half of the year, the valuation as of twelve months can reasonably be expected to be greater than 50% of the twenty-four-month valuation.

    A second reasonability benchmark that can be used to verify the data presentation is to examine the ratio of Section 2 incurred loss and allocated expenses to Section 4 net earned premiums. The ratio of incurred losses to net earned premiums should all be similar at each valuation date. If Section 2 data is not on a policy year basis, but Section 4 is, or ~~vice-versa~~vice versa, the ratios as of twelve months will look very different than the ratios as of twenty-four months.

12. In Section 5 show separately any bulk assets or liabilities for future additional premiums or return of premiums included in the earned premium in Section 4. An entry denoting the expectation of future additional premiums should be displayed as a positive value. An entry denoting the expectation of future return premiums should be displayed as a negative value.

13. (Part 7B only): Loss Sensitive Reinsurance Contracts must be segmented between those on which premium is the adjustable element, and those on which commissions paid to the cedant are adjustable with losses. The premium development schedule (Sections 4 and 5, Part 7B~~ of Schedule P~~) should only include the experience of contracts with a variable premium.

Sections 6 and 7 (Part 7B only): Commission Development:

14. For all reinsurance contracts where the commission paid to the cedant varies with losses, display the development of that commission in Section 6 and display any assets or liabilities accrued in respect of the commission in Section 7. An entry denoting the expectation of future additional commissions to be paid should be displayed as a negative value. An entry denoting the expectation of future return commissions should be displayed as a positive value.

~~The~~ Prior Row:

15. The "Prior" row in Sections 2 and 3 should display the reported estimate of ultimate losses and DCC e~~E~~xpense on a p~~P~~olicy y~~Y~~ear basis for all policy years ten or more years older than the current policy year.

16. The "Prior" row in Sections 4 and 5 should display the reported estimate of net earned premium on a p~~P~~olicy y~~Y~~ear basis for all policy years ten or more years older than the current policy year.

Formulas for Schedule P, Parts 2-4

Schedule P – Part 2 – Incurred Net Losses and Defense and Cost Containment Reported at Year-End

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Prior	Case + Bulk + IBNR rsvs on <2016 @ Ye 2016	paid in 2017 + rsvs on < 2016 @ ye 2017	paid 2017 thru 2018 + rsvs on < 2016 @ ye 2018	paid 2017 thru 2019 + rsvs on < 2016 @ ye 2019	paid 2017 thru 2020 + rsvs on < 2016 @ ye 2020	paid 2017 thru 2021 + rsvs on < 2016 @ ye 2021	paid 2017 thru 2022 + rsvs on < 2016 @ ye 2022	paid 2017 thru 2023 + rsvs on < 2016 @ ye 2023	paid 2017 thru 2024 + rsvs on < 2016 @ ye 2024	paid 2017 thru 2025 + rsvs on < 2016 @ ye 2025
2016	paid in 2016 + rsvs on 2016 @ ye 2016	paid thru 2017 + rsvs on 2016 @ ye 2017	paid thru 2018 + rsvs on 2016 @ ye 2018	paid thru 2019 + rsvs on 2016 @ ye 2019	paid thru 2020 + rsvs on 2016 @ ye 2020	paid thru 2021 + rsvs on 2016 @ ye 2021	paid thru 2022 + rsvs on 2016 @ ye 2022	paid thru 2023 + rsvs on 2016 @ ye 2023	paid thru 2024 + rsvs on 2016 @ ye 2024	paid thru 2025 + rsvs on 2016 @ ye 2025
2017		paid in 2017 + rsvs on 2017 @ ye 2017	paid thru 2018 + rsvs on 2017 @ ye 2018	paid thru 2019 + rsvs on 2017@ ye 2019	paid thru 2020 + rsvs on 2017 @ ye 2020	paid thru 2021 + rsvs on 2017 @ ye 2021	paid thru 2022 + rsvs on 2017 @ ye 2022	paid thru 2023 + rsvs on 2017 @ ye 2023	paid thru 2024 + rsvs on 2017 @ ye 2024	paid thru 2025 + rsvs on 2017 @ ye 2025
2018			paid in 2018 + rsvs on 2018 @ ye 2018	paid thru 2019 + rsvs on 2018 @ ye 2019	paid thru 2020 + rsvs on 2018 @ ye 2020	paid thru 2021 + rsvs on 2018 @ ye 2021	paid thru 2022 + rsvs on 2018 @ ye 2022	paid thru 2023 + rsvs on 2018 @ ye 2023	paid thru 2024 + rsvs on 2018 @ ye 2024	paid thru 2025 + rsvs on 2018 @ ye 2025
2019				paid in 2019 + rsvs on 2019 @ ye 2019	paid thru 2020 + rsvs on 2019 @ ye 2020	paid thru 2021 + rsvs on 2019 @ ye 2021	paid thru 2022 + rsvs on 2019 @ ye 2022	paid thru 2023 + rsvs on 2019 @ ye 2023	paid thru 2024 + rsvs on 2019 @ ye 2024	paid thru 2025 + rsvs on 2019 @ ye 2025
2020					paid in 2020 + rsvs on 2020 @ ye 2020	paid thru 2021 + rsvs on 2020 @ ye 2021	paid thru 2022 + rsvs on 2020 @ ye 2022	paid thru 2023 + rsvs on 2020 @ ye 2023	paid thru 2024 + rsvs on 2020 @ ye 2024	paid thru 2025 + rsvs on 2020 @ ye 2025
2021						paid in 2021 + rsvs on 2021 @ ye 2021	paid thru 2022 + rsvs on 2021 @ ye 2022	paid thru 2023 + rsvs on 2021 @ ye 2023	paid thru 2024 + rsvs on 2021 @ ye 2024	paid thru 2025 + rsvs on 2021 @ ye 2025
2022							paid in 2022 + rsvs on 2022 @ ye 2022	paid thru 2023 + rsvs on 2022 @ ye 2023	paid thru 2024 + rsvs on 2022 @ ye 2024	paid thru 2025 + rsvs on 2022 @ ye 2025
2023								paid in 2023 + rsvs on 2023 @ ye 2023	paid thru 2024 + rsvs on 2023 @ ye 2024	paid thru 2025 + rsvs on 2023 @ ye 2025
2024									paid in 2024 + rsvs on 2024 @ ye 2024	paid thru 2025 + rsvs on 2024 @ ye 2025
2025										paid in 2025 + rsvs on 2025 @ ye 2025

Notes Figures are net of reinsurance, subrogation, and salvage.

(dark shading)	Reserves Only. Subsequent development relates only to subsequent payments and reserves.
(light shading)	From Part 1: Column 11 - (Column 8 - Column 9) + Column 24 - (Column 21 - Column 22), plus any tabular discount netted from the loss reserves in Column 24

Schedule P–- Part 3 – Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year-End

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Number of Claims Closed With Loss Payment	Number of Claims Closed Without Loss Payment
Prior	000	paid in 2017 on < 2016*	paid 2017 thru 2018 on < 2016	paid 2017 thru 2019 on < 2016	paid 2017 thru 2020 on < 2016	paid 2017 thru 2021 on < 2016	paid 2017 thru 2022 on < 2016	paid 2017 thru 2023 on < 2016	paid 2017 thru 2024 on < 2016	paid 2017 thru 2025 on < 2016		
2016	paid in 2016 on 2016	paid thru 2017 on 2016	paid thru 2018 on 2016	paid thru 2019 on 2016	paid thru 2020 on 2016	paid thru 2021 on 2016	paid thru 2022 on 2016	paid thru 2023 on 2016	paid thru 2024 on 2016	paid thru 2025 on 2016		
2017		paid in 2017 on 2017	paid thru 2018 on 2017	paid thru 2019 on 2017	paid thru 2020 on 2017	paid thru 2021 on 2017	paid thru 2022 on 2017	paid thru 2023 on 2017	paid thru 2024 on 2017	paid thru 2025 on 2017		
2018			paid in 2018 on 2018	paid thru 2019 on 2018	paid thru 2020 on 2018	paid thru 2021 on 2018	paid thru 2022 on 2018	paid thru 2023 on 2018	paid thru 2024 on 2018	paid thru 2025 on 2018		
2019				paid in 2019 on 2019	paid thru 2020 on 2019	paid thru 2021 on 2019	paid thru 2022 on 2019	paid thru 2023 on 2019	paid thru 2024 on 2019	paid thru 2025 on 2019		
2020					paid in 2020 on 2020	paid thru 2021 on 2020	paid thru 2022 on 2020	paid thru 2023 on 2020	paid thru 2024 on 2020	paid thru 2025 on 2020		
2021						paid in 2021 on 2021	paid thru 2022 on 2021	paid thru 2023 on 2021	paid thru 2024 on 2021	paid thru 2025 on 2021		
2022							paid in 2022 on 2022	paid thru 2023 on 2022	paid thru 2024 on 2022	paid thru 2025 on 2022		
2023								paid in 2023 on 2023	paid thru 2024 on 2023	paid thru 2025 on 2023		
2024									paid in 2024 on 2024	paid thru 2025 on 2024		
2025										paid in 2025 on 2025		

Notes: Figures are net of reinsurance.
Figures are net of salvage and subrogation received.
* "on < 2016" here means "on net loss and DCC expense reserves established by the company as of 12/31/16 for incurred years prior to 2016"

[shaded box] From Part 1: Column 4 - Column 5 + Column 6 - Column 7 (or Column 11 - (Column 8 - Column 9))

Schedule P - Part 4 - Bulk and INBR Reserves on Net Losses and DCC Expenses
Reported at Year End

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Prior	rsvs ye 2016 on < 2016	rsvs ye 2017 on < 2016	rsvs ye 2018 on < 2016	rsvs ye 2019 on < 2016	rsvs ye 2020 on < 2016	rsvs ye 2021 on < 2016	rsvs ye 2022 on < 2016	rsvs ye 2023 on < 2016	rsvs ye 2024 on < 2016	rsvs ye 2025 on < 2016
2016	rsvs ye 2016 on 2016 ~~ay~~	rsvs ye 2017 on 2016 ~~ay~~	rsvs ye 2018 on 2016 ~~ay~~	rsvs ye 2019 on 2016 ~~ay~~	rsvs ye 2020 on 2016 ~~ay~~	rsvs ye 2021 on 2016 ~~ay~~	rsvs ye 2022 on 2016 ~~ay~~	rsvs ye 2023 on 2016 ~~ay~~	rsvs ye 2024 on 2016 ~~ay~~	rsvs ye 2025 on 2016 ~~ay~~
2017		rsvs ye 2017 on 2017 ~~ay~~	rsvs ye 2018 on 2017 ~~ay~~	rsvs ye 2019 on 2017 ~~ay~~	rsvs ye 2020 on 2017 ~~ay~~	rsvs ye 2021 on 2017 ~~ay~~	rsvs ye 2022 on 2017 ~~ay~~	rsvs ye 2023 on 2017 ~~ay~~	rsvs ye 2024 on 2017 ~~ay~~	rsvs ye 2025 on 2017 ~~ay~~
2018			rsvs ye 2018 on 2018 ~~ay~~	rsvs ye 2019 on 2018 ~~ay~~	rsvs ye 2020 on 2018 ~~ay~~	rsvs ye 2021 on 2018 ~~ay~~	rsvs ye 2022 on 2018 ~~ay~~	rsvs ye 2023 on 2018 ~~ay~~	rsvs ye 2024 on 2018 ~~ay~~	rsvs ye 2025 on 2018 ~~ay~~
2019				rsvs ye 2019 on 2019 ~~ay~~	rsvs ye 2020 on 2019 ~~ay~~	rsvs ye 2021 on 2019 ~~ay~~	rsvs ye 2022 on 2019 ~~ay~~	rsvs ye 2023 on 2019 ~~ay~~	rsvs ye 2024 on 2019 ~~ay~~	rsvs ye 2025 on 2019 ~~ay~~
2020					rsvs ye 2020 on 2020 ~~ay~~	rsvs ye 2021 on 2020 ~~ay~~	rsvs ye 2022 on 2020 ~~ay~~	rsvs ye 2023 on 2020 ~~ay~~	rsvs ye 2024 on 2020 ~~ay~~	rsvs ye 2025 on 2020 ~~ay~~
2021						rsvs ye 2021 on 2021 ~~ay~~	rsvs ye 2022 on 2021 ~~ay~~	rsvs ye 2023 on 2021 ~~ay~~	rsvs ye 2024 on 2021 ~~ay~~	rsvs ye 2025 on 2021 ~~ay~~
2022							rsvs ye 2022 on 2022 ~~ay~~	rsvs ye 2023 on 2022 ~~ay~~	rsvs ye 2024 on 2022 ~~ay~~	rsvs ye 2025 on 2022 ~~ay~~
2023								rsvs ye 2023 on 2023 ~~ay~~	rsvs ye 2024 on 2023 ~~ay~~	rsvs ye 2025 on 2023 ~~ay~~
2024									rsvs ye 2024 on 2024 ~~ay~~	rsvs ye 2025 on 2024 ~~ay~~
2025										rsvs ye 2025 on 2025 ~~ay~~

Notes: Figures are net of reinsurance.

From Part 1: Column 15 - Column 16 + Column 19 - Column 20, plus any tabular discount netted from the reserves in Part 1

Earned Premium Development for Schedule P, Part 6

Example

Rows 1 and 2 of the 2023 Part 6 are shown because these rows can be used to calculate Row 1 of the 2024 Part 6.

Annual Statement for the Year 2023 of the XYZ Insurance Company
Schedule P – Part 6
Cumulative Premiums Earned Direct and Assumed at Year End

Year in Which Premiums Were Earned and Losses Were Incurred	CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END ($000 0MITTED)										
	1 2014	2 2015	3 2016	4 2017	5 2018	6 2019	7 2020	8 2021	9 2022	10 2023	11 Current Year Premiums Earned
1. Prior	9,900	1,900	1,200	(1,500)	(2,400)	2,100	(300)	(1,100)	0	0	0
2. 2014	112,000	121,000	126,100	126,600	126,000	127,500	126,300	124,500	124,500	124,400	(100)
…											

Annual Statement for the Year 2024 of the XYZ Insurance Company
Schedule P – Part 6
Cumulative Premiums Earned Direct and Assumed at Year End

Year in Which Premiums Were Earned and Losses Were Incurred	CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END ($000 0MITTED)										
	1 2015~~6~~	2 2016~~7~~	3 2017~~8~~	4 2018~~9~~	5 2019~~20~~	6 2020~~1~~	7 2021~~2~~	8 2022~~3~~	9 2023~~4~~	10 2024~~5~~	11 Current Year Premiums Earned
1. Prior	10,900~~000~~	6,300~~000~~	(1,000) ~~4,000~~	~~3,000~~(3,000)	~~2,200~~3,600	~~1,500~~(1,500)	~~1,000~~(2,900)	~~600~~0	~~300~~(100)	~~100~~0	0~~100~~
2. 2015~~6~~	130,000 ~~350,000~~	~~354,000~~ 139,000	~~356,000~~ 146,000	~~357,000~~ 146,000	~~357,800~~ 146,000	~~358,500~~ 144,000	~~359,000~~ 142,000	~~359,400~~ 142,000	~~359,700~~ 143,000	143,000 ~~359,900~~	0~~200~~
3. 2016~~7~~	~~XXXX~~	164,000 ~~355,000~~	~~359,000~~ 181,000	~~361,000~~ 187,000	~~362,000~~ 187,000	~~362,800~~ 186,000	~~363,500~~ 185,000	~~364,000~~ 182,000	182,000 ~~364,400~~	182,000 ~~364,700~~	0~~300~~
4. 2017~~8~~		~~XXXX~~	213,000 ~~360,000~~	~~364,000~~ 234,000	~~366,000~~ 239,000	~~367,000~~ 241,000	~~367,800~~ 240,000	~~368,500~~ 235,000	~~369,000~~ 233,000	~~369,400~~ 233,000	~~400~~0
5. 2018~~9~~			~~XXXX~~	217,000 ~~365,000~~	~~369,000~~ 225,000	~~371,000~~ 229,000	~~372,000~~ 229,000	~~372,800~~ 227,000	~~373,500~~ 222,000	~~374,000~~ 222,000	~~500~~0
6. 2019~~20~~				~~XXXX~~	239,000 ~~370,000~~	~~374,000~~ 252,000	~~376,000~~ 256,000	~~377,000~~ 258,000	~~377,800~~ 255,000	~~378,500~~ 253,000	~~600~~(2,000)
7. 2020~~1~~					~~XXXX~~	253,000 ~~375,000~~	~~379,000~~ 256,000	~~381,000~~ 259,000	~~382,000~~ 259,000	~~382,800~~ 255,000	~~700~~(4,000)
8. 2021~~2~~						~~XXXX~~	258,000 ~~380,000~~	~~384,000~~ 280,000	~~386,000~~ 285,000	~~387,000~~ 284,000	~~1,000~~(1,000)
9. 2022~~3~~							~~XXXX~~	263,000 ~~385,000~~	~~389,000~~ 285,000	~~391,000~~ 289,000	4,000~~2,000~~
10. 2023~~4~~								~~XXXX~~	279,000 ~~390,000~~	~~394,000~~ 294,000	~~4,000~~15,000
11. 2024~~5~~									~~XXXX~~	305,000 ~~395,000~~	~~395,000~~305,000
12. Totals										~~XXXX~~	317,000~~405,000~~

13. Earned Premiums (Sch P-Pt. 1)	140,900	179,300	236,000	241,000	255,600	267,500	258,100	280,000	296,900	317,000	

~~Schedule P Part 1 EP~~	~~360,000~~	~~365,000~~	~~370,000~~	~~375,000~~	~~380,000~~	~~385,000~~	~~390,000~~	~~395,000~~	~~400,000~~	~~405,000~~	~~XXXX~~

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		FOR NAIC USE ONLY
	DATE: 5/13/2026	Agenda Item # 2026-15BWG MOD Year 2027 Changes to Existing Reporting [X] New Reporting Requirement [ ]
CONTACT PERSON:	Charles Therriault	
TELEPHONE:	212-386-1920	
EMAIL ADDRESS:	ctherriault@naic.org	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
ON BEHALF OF:	Investment Designation Analysis (E) Working Group (IDAWG)	No Impact [X] Modifies Required Disclosure [ ]
NAME:	Ken Cotrone	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
TITLE:	Chair IDAWG	
AFFILIATION:	Connecticut DOI	**DISPOSITION**
ADDRESS:		[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date ________ [ ] Rejected Date ________ [ ] Deferred Date ________ [ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the "CUSIP" column throughout the annual and quarterly investment schedules to be a "Security Identifier" column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. Also add a Security ID Type column to the investment schedules to identify what security identifier is being used. Remove electronic only ISIN column because the ISIN will now be reported in the Security Identifier column. Update references to CUSIP throughout the annual and quarterly statement to be Security Identifier when the instructions are not specifically referring to CUSIP.

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

The purpose of this proposal is to improve investment security identification and integration with other NAIC systems, data, and reporting.

IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:

Other Comments:

**** This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

The following definitions apply to the investment schedules.

SAP Book Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

Original Cost, including capitalized acquisition costs and accumulated depreciation, unamortized premium and discount, deferred origination and commitment fees, direct write-downs, and increase/(decrease) by adjustment.

SAP Carrying Value (Defined in Glossary of *Accounting Practices and Procedures Manual)*:

The SAP Book Value plus accrued interest and reduced by any valuation allowance (IF APPLICABLE) and any nonadmitted adjustment applied to the individual investment. Carrying Value is used in the determination of impairment.

Adjusted Carrying Value:

Carrying Value amount adjusted to remove any accrued interest and to add back any of the following amounts: individual nonadmitted amounts, individual valuation allowances (IF APPLICABLE), and aggregate valuation allowance (IF APPLICABLE). In effect, this is equivalent to the definition of SAP Book Value (not to be confused with the old "Book Value" reported in the annual statement blanks for data years 2000 and prior).

Recorded Investment:

The SAP Book Value (Adjusted Carrying Value) plus accrued interest.

The information included in the investment schedules shall be broken down to the level of detail as required when all columns and rows are considered together unless otherwise addressed in specific instructions. For example, on Schedule D Part 4, a reporting entity is required to list the ~~CUSIP~~ security identifier book/adjusted carrying value, among other things. The reporting entity would only be required to break this information down to a lower level of detail if the information was inaccurate if reported in the aggregate. Thus, the reporting entity would not be required to break the information down by lot (information for each individual purchase) and could utilize the information for book/adjusted carrying value using an average cost basis, or some other method, provided the underlying data reported in that cell was calculated in accordance with the *Accounting Practices and Procedures Manual*. However, reporting entities are not precluded from reporting the information at a more detailed level (by lot) if not opposed by their domiciliary commissioner.

"To Be Announced" securities (commonly referred to as TBAs) are to be reported in Schedule D unless the structure of the security more closely resembles a derivative, as defined within *SSAP No. 86—Derivatives*, in which case the security should be reported on Schedule DB. The exact placement of TBAs in the investment schedules depends upon how a company uses TBA. (For example, if a reporting entity was to acquire a TBA with the intent to take possession of a Schedule D, Part 1, Section 2 qualifying mortgage-backed security, the TBA shall be reported on the Schedule D, Part 1, Section 2 at acquisition. If a reporting entity was to acquire a TBA, with the intent to roll the TBA, this acquisition is more characteristic of a forward derivative and shall be captured on Schedule DB.)

For Rabbi Trusts, refer to *SSAP No. 104—Share-Based Payments* for accounting guidance.

For the Security Identifier columns, the following hierarchy should be used to report the security identifiers:

1. CUSIP
2. CINS

3. ISIN
4. PPN
5. LXID
6. FIGI
7. ICEID

Detail Eliminated To Conserve Space

SCHEDULE BA – PART 1

OTHER LONG-TERM INVESTED ASSETS OWNED DECEMBER 31 OF CURRENT YEAR

Refer to *SSAP No. 23—Foreign Currency Transactions and Translations* for accounting guidance.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".
~~If no CUSIP number exists, the CUSIP field should be zero-filled.~~

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier. ***Drafting Note: Renumber all remaining columns***

SCHEDULE BA – PART 2

OTHER LONG-TERM INVESTED ASSETS ACQUIRED AND ADDITIONS MADE DURING THE YEAR

This schedule should reflect not only those newly acquired long-term invested assets, but also any increases or additions to long-term invested assets acquired in the current and prior periods, including, for example, capital calls from existing limited partnerships.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no CUSIP number exists, the CUSIP field should be zero-filled.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

SCHEDULE BA – PART 3

OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAID DURING THE YEAR

This schedule should reflect not only disposals of an entire "other invested asset" but should also include partial disposals and amounts received during the year on investments still held, including, for example, return of capital distributions from limited partnerships.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no CUSIP number exists, the CUSIP field should be zero-filled.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier. ***Drafting Note: Renumber all remaining columns***

SCHEDULE D – PART 1- SECTION 1

LONG-TERM BONDS – ISSUER CREDIT OBLIGATIONS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

The security identifier reported ~~(Column 1 for CUSIP, CINS, PPN or Column 36 for ISIN)~~ must be the same as the identifier used when filing securities with the NAIC pursuant to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* instructions.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 36.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

Column ~~33~~34 – PIK Interest

Include the amount of reported interest in which the terms of the investment permit paid "in kind" (PIK) instead of cash.

The amount captured shall reflect the cumulative amount of PIK interest included in the current principal balance.

In disclosing the cumulative amount of PIK interest, identify the specific amounts of PIK interest by lot and aggregate the amounts by ~~CUSIP/PPN~~security identifier that have a net increase to the original par value. The net increase includes PIK interest added to the par value less disposals (i.e., repayments; sales) that are first applied to any PIK interest outstanding. As a practical expedient, an insurer may calculate the cumulative amount of PIK interest on a bond by subtracting the original principal / par value from the current principal / par value, but not less than $0.

Detail Eliminated To Conserve Space

~~Column 36 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 1 – SECTION 2

ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

The security identifier reported ~~(Column 1 for CUSIP, CINS, PPN or Column 37 for ISIN)~~ must be the same as the identifier used when filing securities with the NAIC pursuant to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* instructions.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 37.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

Column ~~34~~35 – PIK Interest

Include the amount of reported interest in which the terms of the investment permit paid "in kind" (PIK) instead of cash.

The amount captured shall reflect the cumulative amount of PIK interest included in the current principal balance.

In disclosing the cumulative amount of PIK interest, identify the specific amounts of PIK interest by lot and aggregate the amounts by ~~CUSIP/PPN~~security identifier that have a net increase to the original par value. The net increase includes PIK interest added to the par value less disposals (i.e., repayments; sales) that are first applied to any PIK interest outstanding. As a practical expedient, an insurer may calculate the cumulative amount of PIK interest on a bond by subtracting the original principal / par value from the current principal / par value, but not less than $0.

Detail Eliminated To Conserve Space

~~Column 37 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 2 – SECTION 1

PREFERRED STOCKS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 27.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 27 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 2 – SECTION 2

COMMON STOCKS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 25.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 25 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 3

LONG-TERM BONDS AND STOCKS ACQUIRED DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were purchased/acquired during the current reporting year that are still owned as of the end of the current reporting year (amounts purchased and sold during the current reporting year are reported in detail on Schedule D, Part 5 and only in subtotal in Schedule D, Part 3). This should include all transactions that adjust the cost basis of the securities. Thus, it should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or other situations such as ~~CUSIP number~~security identifier changes. The following list of items provides examples of the items that should be included:

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 14.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 14 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 4

LONG-TERM BONDS AND STOCKS SOLD, REDEEMED OR OTHERWISE DISPOSED OF DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were sold/disposed of during the current reporting year that were owned as of the beginning of the current reporting year (amounts purchased and sold during the current reporting year are reported in detail on Schedule D, Part 5 and only in subtotal in Schedule D, Part 4). This should include all transactions that adjust the cost basis of the securities (except other-than-temporary impairments that are not part of a disposal transaction). This schedule should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or situations that only involve ~~CUSIP number~~security identifier changes. The following list of items provides examples (not all inclusive) of the items that should be included:

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 26.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 26 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 5

LONG-TERM BONDS AND STOCKS ACQUIRED DURING THE YEAR AND FULLY DISPOSED OF DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were both purchased/acquired and sold/disposed of during the current reporting year (amounts purchased and sold during the current reporting year are also reported in subtotals in Schedule D, Parts 3 and 4).

Reporting entities should track information separately for securities purchased in different lots rather than using some type of averaging for the issue in aggregate. Thus, this schedule should only be used when an entire lot of a security has been purchased and sold during the current reporting year (even when different lots of the same security still exist on the reporting entity's books).

As with Schedule D, Parts 3 and 4, this schedule should be used for transactions that affect the cost basis of the securities. This schedule should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or situations that only involve ~~CUSIP number~~security identifier changes. Refer to the examples on Schedule D, Part 4 of transactions that should be captured.

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 26.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 26 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 6 – SECTION 1

VALUATION OF SHARES OF SUBSIDIARY, CONTROLLED OR AFFILIATED COMPANIES

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 14.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 14 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE DB – PART A – SECTION 1

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS, AND FORWARDS OPEN
DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 2 – Description of Item(s) Hedged, Used for Income Generation or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, "Bond Portfolio Hedge," "VAGLB Hedge," "Fixed Annuity Hedge," "Investment in Foreign Operations," etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART A – SECTION 2

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS, AND FORWARDS TERMINATED DURING CURRENT YEAR

Detail Eliminated To Conserve Space

Column 2 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, "Bond Portfolio Hedge," "VAGLB Hedge," "Fixed Annuity Hedge," "Investment in Foreign Operations," etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 1

FUTURES CONTRACTS OPEN
DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 2

FUTURES CONTRACTS TERMINATED DURING CURRENT YEAR

Detail Eliminated To Conserve Space

Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, "Bond Portfolio Hedge," "VAGLB Hedge," "Fixed Annuity Hedge," "Investment in Foreign Operations," etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART C – SECTION 1

REPLICATION (SYNTHETIC ASSET) TRANSACTIONS (RSAT) OPEN ON DECEMBER 31 OF CURRENT YEAR

Include all RSATs owned December 31 of current year, including those open on December 31 of the previous year, and those acquired during the current year.

Column 1 – RSAT Number

Enter the RSAT Number Security ID that was filed with the NAIC's Securities Valuation Office (SVO) pursuant to the instructions in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual).~~as administered by the CUSIP Division of Standard & Poor's.~~

Detail Eliminated To Conserve Space

Column 12 – ~~CUSIP~~ Security Identifier of Cash Instrument(s) Held

Enter the ~~CUSIP~~ security identifier or Investment Number of the Cash Instrument(s) used in the RSAT as the instrument appears on the appropriate investment schedule.

~~(a) CUSIP digits 1-6: Issuer number~~
~~(b) CUSIP digits 7-8: Exact issue sequence~~
~~(c) CUSIP digit 9: Check digit~~

Column 13 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

SCHEDULE DB – PART D – SECTION 2

COLLATERAL FOR DERIVATIVE INSTRUMENTS OPEN
DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 3 – ~~CUSIP Identification~~Security Identifier

Enter the ~~CUSIP/PPN/CINS~~security identifier number of the asset pledged or received as collateral, when appropriate. If no ~~CUSIP/PPN/CINS~~security identifier number exists, the field should be zero-filled.

Column 4 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS
Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets reported in aggregate on Line 10 of the Asset page
(Line 9 for Separate Accounts) and not included on Schedules A, B, BA, D, DB, and E)

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in (Column 12).~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

The ~~CUSIP~~ security identifier reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0019999999 through 0509999999	Schedule D, Part 1, Section 1, Column 1
Lines 1019999999 through 1909999999	Schedule D, Part 1, Section 2, Column 1
Lines 4019999999 through 4509999999	Schedule D, Part 2, Section 1, Column 1
Lines 5019999999 through 5989999999	Schedule D, Part 2, Section 2, Column 1
Line 9409999999	Schedule BA, Part 1, Column 1
Line 9709999999	Schedule E, Part 2, Column 1

The ~~CUSIP number~~security identifier should be zero-filled for the following lines:

Real Estate (Schedule A type)	9209999999
Mortgage Loans on Real Estate (Schedule B type)	9309999999
Short-Term Invested Assets (Schedule DA, Part 1 type)	9509999999
Cash (Schedule E, Part 1 type)	9609999999
Other Assets	9809999999

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

******Drafting Note: Renumber all remaining columns******

Detail Eliminated To Conserve Space

~~Column 12 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

~~The ISIN reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:~~

~~Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 36~~
~~Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 37~~
~~Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 27~~
~~Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 25~~

~~The ISIN number should be zero-filled for the following lines:~~

~~Real Estate (Schedule A type) .... 9209999999~~
~~Mortgage Loans on Real Estate (Schedule B type) .... 9309999999~~
~~Other Invested Assets (Schedule BA type) .... 9409999999~~
~~Short-Term Invested Assets (Schedule DA, Part 1 type) .... 9509999999~~
~~Cash (Schedule E, Part 1 type) .... 9609999999~~
~~Cash Equivalents (Schedule E, Part 2 type) .... 9709999999~~
~~Other Assets .... 9809999999~~

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB, and E
and not reported in aggregate on Line 10 of the Asset page (Line 9 for Separate Accounts))

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the CUSIP Global Services. For foreign securities, use a CINS that is assigned by the CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in (Column 12).~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

The ~~CUSIP~~ security identifier reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 1
Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 1
Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 1
Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 1
Line 9409999999.. Schedule BA, Part 1, Column 1
Line 9709999999.. Schedule E, Part 2, Column 1

The ~~CUSIP number~~security identifier should be zero-filled for the following lines:

Real Estate (Schedule A) 9209999999
Mortgage Loans on Real Estate (Schedule B) 9309999999
Short-Term Invested Assets (Schedule DA, Part 1) 9509999999
Cash (Schedule E, Part 1) 9609999999
Other Assets.. 9809999999

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 12 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

~~The ISIN reported for this column should be same for the security as reported in other schedules for the lines shown below:~~

~~Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 36~~
~~Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 37~~
~~Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 27~~
~~Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 25~~

~~The ISIN number should be zero-filled for the following lines:~~

~~Real Estate (Schedule A) .... 9209999999~~
~~Mortgage Loans on Real Estate (Schedule B) .... 9309999999~~
~~Other Invested Assets (Schedule BA)........ 9409999999~~
~~Short-Term Invested Assets (Schedule DA, Part 1) .... 9509999999~~
~~Cash (Schedule E, Part 1) .... 9609999999~~
~~Cash Equivalents (Schedule E, Part 2)........ 9709999999~~
~~Other Assets........ 9809999999~~

SCHEDULE E – PART 2 – CASH EQUIVALENTS

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

~~CUSIP identification~~A security identifier is **required and valid only** for Exempt Money Market Mutual Funds – as Identified by SVO (Line 8209999999) and All Other Money Market Mutual Funds (Line 8309999999).

SUPPLEMENTAL INVESTMENT RISKS INTERROGATORIES

Detail Eliminated To Conserve Space

Line 2 – Report the single 10 largest exposures to a single issuer/borrower/investment.

Determine the ten largest exposures by first, aggregating investments from all investment categories (except the excluded categories) by ~~issuer~~issuing entity. ~~The first six digits of the CUSIP number can be used as a starting point; however, please note that the same issuer may have more than one unique series of the first six digits of the CUSIP.~~ Report the aggregate exposure to the same issuing entity. For example, the reporting entity owns bonds issued by the XYZ Company of $500,000 and common stock of the XYZ Company of $600,000. In addition, the reporting entity has a mortgage loan to the XYZ Company of $300,000. The total exposure to Issuer XYZ Company is $1.4 million ($500,000+$600,000+$300,000).

For funds that are not diversified within the meaning of the Investment Company Act of 1940, insurance reporting entities are required to identify actual exposures and aggregate those exposures with directly held investments to determine the 10 largest exposures. For example, if a reporting entity directly holds a significant number of investments in Exxon Mobil and holds a non-diversified closed-end fund with a high concentration of Exxon Mobil, the reporting entity shall aggregate the direct investments with the investments in the closed-end funds to determine the aggregate investment risk to Exxon Mobil.

SEC registered investment funds are required by law to disclose holdings within 60 days following the fund's fiscal quarter end. Insurers who own funds classified as "non-diversified" are to use the last publicly available fund holding disclosure to account for holdings that should be included in their Top 10 holdings.

Exclude:

U.S. Government and U. S. Government Agency securities listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* as "Securities That Are Considered "Exempt Obligations" For Purposes of Determining The Asset Valuation Reserve and The Risk-Based Capital Calculation";

Those U.S. Government money market funds listed on "NAIC U.S. Direct Obligations/Full Faith and Credit Exemption List Money Market Fund List" found on the Securities Valuation Office Web page (*https://www.naic.org/svo.htm*);

Property occupied by the company

Policy loans

All SEC and foreign registered funds (open-end, closed end, UIT, and ETFs) and common trust funds that are diversified within the meaning of the Investment Company Act of 1940 [Section 5(b) (1)].

In Column 2, list the categories of securities that are included in the total for each issuer (e.g., bonds, mortgage loans, etc.)

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL & SEPARATE ACCOUNTS

ASSET VALUATION RESERVE

REPLICATION (SYNTHETIC) ASSETS –
BASIC CONTRIBUTION, RESERVE OBJECTIVE, AND MAXIMUM RESERVE CALCULATIONS

This worksheet should contain a line for each replicated (synthetic) asset and each cash instrument component of all replication (synthetic asset) transactions undertaken by the reporting entity. The assets should be sorted first by RSAT number, next by type (replicated assets first then cash instruments) and finally by ~~CUSIP~~Security Identifier and Security ID Type.

Column 1 – RSAT Number

The RSAT number for each transaction should be that used in Schedule DB, Part C, Section 1.

Column 2 – Type

Enter:

“R” For replicated asset, if the line describes one of the replicated (synthetic) assets,

“CW” For cash instrument with credit, if the line describes one of the cash instruments constituting the transaction and the transaction either:

(1) Is a swap of prospectively determined interest rates or

(2) Eliminates the asset risk associated with the cash instrument

“CN” For cash instrument with no credit, if the line describes one of the cash instruments constituting the transaction and the transaction does not eliminate the reporting entity’s exposure to the asset risk associated with the instrument.

Column 3 – ~~CUSIP~~Security Identifier

Show the ~~CUSIP~~ security identifier for all cash instruments that are securities.

Column 4 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

QUARTERLY STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

INVESTMENT SCHEDULES GENERAL INSTRUCTIONS
(Applies to all investment schedules)

The following definitions apply to the investment schedules.

SAP Book Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

Original Cost, including capitalized acquisition costs and accumulated depreciation, unamortized premium and discount, deferred origination and commitment fees, direct write-downs and increase/decrease by adjustment.

SAP Carrying Value (Defined in Glossary of *Accounting Practices and Procedures Manual*):

The SAP Book Value plus accrued interest and reduced by any valuation allowance (IF APPLICABLE) and any nonadmitted adjustment applied to the individual investment. Carrying Value is used in the determination of impairment.

Adjusted Carrying Value:

Carrying Value amount adjusted to remove any accrued interest and to add back any of the following amounts: individual nonadmitted amounts, individual valuation allowances (IF APPLICABLE), and aggregate valuation allowance (IF APPLICABLE). In effect, this is equivalent to the definition of SAP Book Value (not to be confused with the old "Book Value" reported in the annual statement blanks for data years 2000 and prior).

Recorded Investment:

The SAP Book Value (Adjusted Carrying Value) plus accrued interest.

The information included in the investment schedules shall be broken down to the level of detail as required when all columns and rows are considered together unless otherwise addressed in specific instructions. For example, on Schedule D, Part 4, a reporting entity is required to list the ~~CUSIP~~ security identifier book/adjusted carrying value, among other things. The reporting entity would only be required to break this information down to a lower level of detail if the information were inaccurate if reported in the aggregate. Thus, the reporting entity would not be required to break the information down by lot (information for each individual purchase) and could utilize the information for book/adjusted carrying value using an average cost basis, or some other method, provided the underlying data reported in that cell was calculated in accordance with the *Accounting Practices and Procedures Manual*. However, reporting entities are not precluded from reporting the information at a more detailed level (by lot) if not opposed by their domiciliary commissioner.

"To Be Announced" securities (commonly referred to as TBAs) are to be reported in Schedule D unless the structure of the security more closely resembles a derivative, as defined within *SSAP No. 86—Derivatives* in which case the security should be reported on Schedule DB. The exact placement of TBAs in the investment schedules depends upon how a company uses TBA. (For example, if a reporting entity was to acquire a TBA with the intent to take possession of a Schedule D, Part 1, Section 2 qualifying mortgage-backed security, the TBA shall be reported on the Schedule D, Part 1, Section 2 at acquisition. If a reporting entity was to acquire a TBA, with the intent to roll the TBA, this acquisition is more characteristic of a forward derivative and shall be captured on Schedule DB.)

For Rabbi Trusts, refer to *SSAP No. 104—Share-Based Payments*, for accounting guidance.

For the Security Identifier columns, the following hierarchy should be used to report the security identifiers:

1. CUSIP
2. CINS

3. ISIN
4. PPN
5. LXID
6. FIGI
7. ICEID

Detail Eliminated To Conserve Space

SCHEDULE BA – PART 2

OTHER LONG-TERM INVESTED ASSETS ACQUIRED AND ADDITIONS MADE DURING THE CURRENT QUARTER

This schedule should reflect not only those newly acquired long-term invested assets, but also any increases or additions to long-term invested assets acquired in the current and prior periods, including, for example, capital calls from existing limited partnerships.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no CUSIP number exists, the CUSIP field should be zero-filled.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

SCHEDULE BA – PART 3

OTHER LONG-TERM INVESTED ASSETS DISPOSED, TRANSFERRED OR REPAID DURING THE CURRENT QUARTER

This schedule should reflect not only disposals of an entire "other invested asset" but should also include partial disposals and amounts received during the year on investments still held, including, for example, return of capital distributions from limited partnerships.

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~If no CUSIP number exists, the CUSIP field should be zero-filled.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

SCHEDULE D – PART 3

LONG-TERM BONDS AND STOCKS ACQUIRED DURING THE CURRENT QUARTER

This schedule should include a detail listing of all securities that were purchased/acquired during the current reporting quarter. Detailed information for investments that are acquired and disposed of during the current reporting quarter should be included in this schedule and in Schedule D, Part 4. Note that this is not a detailed listing of items for the Year-to-Date. This should include all transactions that adjust the cost basis of the securities. Thus, it should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3, or other situations such as ~~CUSIP number~~security identifier changes. The following list of items provides examples of the items that should be included:

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services:

www.cusip.com/cusip/index.htm

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 15.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 15 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE D – PART 4

LONG-TERM BONDS AND STOCKS SOLD, REDEEMED OR OTHERWISE DISPOSED OF DURING THE CURRENT QUARTER

This schedule should include a detail listing of all securities that were sold/disposed of during the current quarter that were owned as of the beginning of the current quarter. Detailed information for investments that are acquired and disposed of during the current reporting quarter should be included in this schedule and in Schedule D, Part 3. Note that this is not a detailed listing of items for the Year-to-Date. This should include all transactions that adjust the cost basis of the securities (except other-than-temporary impairments that are not part of a disposal transaction). This schedule should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3, or situations that only involve ~~CUSIP number~~security identifier changes. The following list of items provides examples (not all inclusive) of the items that should be included:

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services:

www.cusip.com/cusip/index.htm

~~If no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 27.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

Column ~~21~~22 – NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol

Provide the appropriate combination of the NAIC Designation (1 through 6), NAIC Designation Modifier (A through G) and SVO Administrative Symbol (see below) at date of disposal for each security shown. The list of valid SVO Administrative Symbols is shown below.

Where multiple disposal transactions occurred for the same ~~CUSIP~~security identifier, and those transactions are summarized on one line, enter the appropriate combination of NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol for the last disposal using the last available designation.

Detail Eliminated To Conserve Space

~~Column 27 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

SCHEDULE DB – PART A – SECTION 1

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS AND FORWARDS OPEN

Detail Eliminated To Conserve Space

Column 2 – Description of Items Hedged or Used for Income Generation or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART B – SECTION 1

FUTURES CONTRACTS OPEN

Detail Eliminated To Conserve Space

Column 5 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including ~~CUSIP(s)~~security identifier(s), when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the ~~CUSIP~~ security identifier and a complete and accurate description of the bond; if multiple ~~CUSIPs~~security identifiers, note that there are multiple ~~CUSIPs~~ security identifiers and report the equity ticker or name of the ultimate parent, as applicable.

SCHEDULE DB – PART C – SECTION 1

REPLICATION (SYNTHETIC ASSET) TRANSACTIONS (RSATs) OPEN AT CURRENT STATEMENT DATE

Include all RSATs owned as of the current statement date, including those that were open on December 31 of the previous year, and those acquired during the current year.

Column 1 – RSAT Number

Enter the RSAT Number Security ID that was filed with the NAIC's Securities Valuation Office (SVO) pursuant to the instructions in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual).

Detail Eliminated To Conserve Space

Column 12 – ~~CUSIP~~ Security Identifier of Cash Instrument(s) Held

Enter the ~~CUSIP~~ security identifier or Investment Number of the Cash Instrument(s) used in the RSAT as the instrument appears on the appropriate investment schedule.

~~(a) CUSIP digits 1-6: Issuer number~~
~~(b) CUSIP digits 7-8: Exact issue sequence~~
~~(c) CUSIP digit 9: check digit~~

Column 13 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

*****Drafting Note: Renumber all remaining columns*****

SCHEDULE DB – PART D – SECTION 2

COLLATERAL FOR DERIVATIVE INSTRUMENTS OPEN AS OF CURRENT STATEMENT DATE

Detail Eliminated To Conserve Space

Column 3 – ~~CUSIP Identification~~Security Identifier

Enter the ~~CUSIP/PPN/CINS~~security identifier number of the asset pledged or received as collateral, when appropriate. If no ~~CUSIP/PPN/CINS~~security identifier number exists, the field should be zero-filled.

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
(Securities lending collateral assets reported in aggregate on Line 10 of the asset page
(Line 9 for Separate Accounts) and not included on Schedules A, B, BA, D, DB and E.)

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 11.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

The ~~CUSIP~~ security identifier reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0019999999 through 0509999999	Schedule D, Part 1, Section 1, Column 1
Lines 1019999999 through 1909999999	Schedule D, Part 1, Section 2, Column 1
Lines 4019999999 through 4509999999	Schedule D, Part 2, Section 1, Column 1
Lines 5019999999 through 5989999999	Schedule D, Part 2, Section 2, Column 1
Line 9409999999	Schedule BA, Part 1, Column 1
Line 9709999999	Schedule E, Part 2, Column 1

The ~~CUSIP~~ security identifier number should be zero-filled for the following lines:

Real Estate (Schedule A type)	9209999999
Mortgage Loans on Real Estate (Schedule B type)	9309999999
Short-Term Invested Assets (Schedule DA, Part 1 type)	9509999999
Cash (Schedule E, Part 1 type)	9609999999
Other Assets	9809999999

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 10 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

~~The ISIN reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:~~

~~Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 35~~
~~Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 37~~
~~Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 27~~
~~Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 25~~

~~The ISIN number should be zero-filled for the following lines:~~

~~Real Estate (Schedule A type) .... 9209999999~~
~~Mortgage Loans on Real Estate (Schedule B type) .... 9309999999~~
~~Other Invested Assets (Schedule BA type) .... 9409999999~~
~~Short-Term Invested Assets (Schedule DA, Part 1 type) .... 9509999999~~
~~Cash (Schedule E, Part 1 type) .... 9609999999~~
~~Cash Equivalents (Schedule E, Part 2 type) .... 9709999999~~
~~Other Assets .... 9809999999~~

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned Current Statement Date
(Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
(Line 9 for Separate Accounts) and not reported in aggregate on Line 10 of the asset page.)

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

Enter a valid security identifier: CUSIP, CINS, PPN, LXID, ~~or~~ ISIN, FIGI, or ICEID. For identifier reporting hierarchy refer to the Investment Schedules General Instructions.

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by CUSIP Global Services. For foreign securities, use a CINS that is assigned by CUSIP Global Services: *www.cusip.com/cusip/index.htm*.

~~For Lines 0019999999 through 1909999999, if no valid CUSIP, CINS or PPN number exists, then the CUSIP field should be zero-filled and a valid ISIN security number should be reported in Column 11.~~ LXID numbers (S&P Global's LoanX ID) are unique identifiers developed to track individual loans, borrowers, and lenders in the syndicated loan and private credit markets.

ISIN numbers (International Securities Identification Numbering) are an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options, and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities.

FIGI numbers (Financial Instrument Global Identifier) are identifiers issued by the Object Management Group (OMG) approved certified providers.

ICEID numbers (Intercontinental Exchange, Inc. (ICE) Identifier) are permanently unique identifiers developed by ICE Private Credit Intelligence, LLC, to track individual securities and loans in the private markets.

For securities acquired within initial reporting year end of the financial statement reporting date that have not yet been issued an NAIC recognized security identifier but there was one requested, the security identifier field should be zero filled "000000000". This is a temporary security identifier of "000000000" that could only be used one time, in the initial reporting year, but would need to be changed to an identifier of "999999999" in any subsequent reporting year end if an NAIC recognized security identifier was ultimately not able to be obtained.

For securities that the insurer does not expect to receive a security identifier, the security identifier field should be nine filled "999999999".

The ~~CUSIP~~ security identifier reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 1
Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 1
Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 1
Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 1
Line 9409999999.. Schedule BA, Part 1, Column 1
Line 9709999999.. Schedule E, Part 2, Column 1

The ~~CUSIP number~~security identifier should be zero-filled for the following lines:

Real Estate (Schedule A) 9209999999
Mortgage Loans on Real Estate (Schedule B) 9309999999
Short-Term Invested Assets (Schedule DA, Part 1) 9509999999
Cash (Schedule E, Part 1) 9609999999
Other Assets.. 9809999999

Column 2 – Security ID Code

Enter one of the following codes to identify the type of security identifier:

C - CUSIP and CINS (including syndicated loans with a CUSIP)
P - PPN
L - LXID
I - ISIN (including syndicated loans with an ISIN)
F - FIGI
E - ICEID

Leave the Security ID Code blank if using zero filled for newly acquired securities or nine filled for not expecting an identifier.

Drafting Note: Renumber all remaining columns

Detail Eliminated To Conserve Space

~~Column 10 – ISIN Identification~~

~~The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.~~

~~The ISIN reported for this column should be same for the security as reported in other schedules for the lines shown below:~~

~~Lines 0019999999 through 0509999999 .... Schedule D, Part 1, Section 1, Column 35~~
~~Lines 1019999999 through 1909999999 .... Schedule D, Part 1, Section 2, Column 37~~
~~Lines 4019999999 through 4509999999 .... Schedule D, Part 2, Section 1, Column 27~~
~~Lines 5019999999 through 5989999999 .... Schedule D, Part 2, Section 2, Column 25~~

~~The ISIN number should be zero-filled for the following lines:~~

~~Real Estate (Schedule A) .... 9209999999~~
~~Mortgage Loans on Real Estate (Schedule B) .... 9309999999~~
~~Other Invested Assets (Schedule BA).. 9409999999~~
~~Short-Term Invested Assets (Schedule DA, Part 1) .... 9409999999~~
~~Cash (Schedule E, Part 1) .... 9609999999~~
~~Cash Equivalents (Schedule E, Part 2) .... 9709999999~~
~~Other Assets.. 9809999999~~

SCHEDULE E – PART 2 – CASH EQUIVALENTS

INVESTMENTS OWNED END OF CURRENT QUARTER

Detail Eliminated To Conserve Space

Column 1 – ~~CUSIP Identification~~Security Identifier

~~CUSIP identification~~A security identifier is **required and valid only** for Exempt Money Market Mutual Funds –as Identified by SVO (Line 8209999999) and All Other Money Market Mutual Funds (Line 8309999999).

DRAFTING NOTE: Update all references of CUSIP in the Annual/Quarterly Statement Instructions that refer to a security identifier and not specifically to a CUSIP number.

See below for a list of schedules/exhibits/notes with updates:

- Note 1C(2) Instruction
    - Health, Life/Fraternal, Property, and Title
    - Annual

- Note 5D(3) Instruction and Illustration
    - Health, Life/Fraternal, Property, and Title
    - Annual and Quarterly

- Note 5Q Instruction and Illustration
    - Health, Life/Fraternal, Property, and Title
    - Annual

- Interest Maintenance Reserve (IMR), Line 2
    - Life/Fraternal
    - Annual

ANNUAL STATEMENT BLANK –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

SCHEDULE BA – PART 1

Showing Other Long-Term Invested Assets OWNED December 31 of Current Year

1	2	~~2~~3	~~3~~4	Location		~~6~~7	~~7~~8	~~8~~9	~~9~~10	~~10~~11	~~11~~12	~~12~~13	Change in Book/Adjusted Carrying Value					~~18~~19	~~19~~20	~~20~~21
				~~4~~5	~~5~~6								~~13~~14	~~14~~15	~~15~~16	~~16~~17	~~17~~18			
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Name or Description	Restricted Asset Code	City	State	Name of Vendor or General Partner	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Date Originally Acquired	Type and Strategy	Actual Cost	Fair Value	Book/ Adjusted Carrying Value Less Encumbrances	Unrealized Valuation Increase/ (Decrease)	Current Year's (Depreciation) or (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Capitalized Deferred Interest and Other	Total Foreign Exchange Change in B./A.C.V.	Investment Income	Commitment for Additional Investment	Percentage of Ownership

SCHEDULE BA – PART 2

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE December 31 of Current Year

1	2	~~2~~3	Location		~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10	~~10~~11	~~11~~12
			~~3~~4	~~4~~5							
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Name or Description	City	State	Name of Vendor or General Partner	Date Originally Acquired	Type and Strategy	Actual Cost at Time of Acquisition	Additional Investment Made After Acquisition	Amount of Encumbrances	Percentage of Ownership

SCHEDULE BA – PART 3

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Year

1	2	~~2~~3	Location		~~5~~6	~~6~~7	~~7~~8	~~8~~9	Change in Book/Adjusted Carrying Value						~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20	~~20~~21
			~~3~~4	~~4~~5					~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15						
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Name or Description	City	State	Name of Purchaser or Nature of Disposal	Date Originally Acquired	Disposal Date	Book/Adjusted Carrying Value Less Encumbrances, Prior Year	Unrealized Valuation Increase/ (Decrease)	Current Year's (Depreciation) or (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Capitalized Deferred Interest and Other	Total Change in B./A.C.V. (9+10-11+12)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value Less Encumbrances on Disposal	Consideration	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Investment Income

SCHEDULE D – PART 1 – SECTION 1

Showing All Long-Term **BONDS – ISSUER CREDIT OBLIGATIONS** Owned December 31 of Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	Change in Book/Adjusted Carrying Value				Interest					Dates		~~20~~21
									~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15	~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20	
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Description	Restricted Asset Code	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Actual Cost	Par Value	Fair Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Foreign Exchange Change in B./A.C.V.	Stated Rate of	Effective Rate of	When Paid	Interest Income Due & Accrued	Interest Received During Year	Acquired	Stated Contractual Maturity Date	Payment Due at Maturity

SCHEDULE D – PART 1 – SECTION 2

Showing All Long-Term **BONDS – ASSET-BACKED SECURITIES** Owned December 31 of Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	Change in Book/Adjusted Carrying Value				Interest					Dates		~~20~~21	~~21~~22
									~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15	~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20		
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Description	Restricted Asset Code	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Actual Cost	Par Value	Fair Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Foreign Exchange Change in B./A.C.V.	Stated Rate of	Effective Rate Of	When Paid	Interest Income Due & Accrued	Interest Received During Year	Acquired	Stated Contractual Maturity Date	Payment Due at Maturity	Origination Balloon Payment %

SCHEDULE D – PART 2 – SECTION 1

Showing All **PREFERRED STOCKS** Owned December 31 of Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	Fair Value		~~9~~10	Dividends				Change in Book/Adjusted Carrying Value					~~19~~20	~~20~~ 21
							~~7~~8	~~8~~9		~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15	~~15~~16	~~16~~17	~~17~~18	~~18~~19		
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Description	Restricted Asset Code	Number of Shares	Par Value Per Share	Book/ Adjusted Carrying Value	Rate per Share Used to Obtain Fair Value	Fair Value	Actual Cost	Amount Received During Year	Declared But Unpaid	Nonadmitted Declared But Unpaid	Cumulative Undeclared	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Change in B./A.C.V. (14+15-16)	Total Foreign Exchange Change in B./A.C.V.	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Date Acquired

SCHEDULE D – PART 2 – SECTION 2

Showing all **COMMON STOCKS** Owned December 31 of Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	Fair Value		~~8~~9	Dividends			Change in Book/Adjusted Carrying Value				~~16~~17	~~17~~18
						~~6~~7	~~7~~8		~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15	~~15~~16		
~~CUSIP~~ Security ~~Identification~~ Identifier	Security ID Type	Description	Restricted Asset Code	Number of Shares	Book/Adjusted Carrying Value	Rate per Share Used to Obtain Fair Value	Fair Value	Actual Cost	Declared but Unpaid	Amount Received During Year	Nonadmitted Declared But Unpaid	Unrealized Valuation Increase/ (Decrease)	Current Year's Other-Than-Temporary Impairment Recognized	Total Change in B./A.C.V. (12-13)	Total Foreign Exchange Change in B./A.C.V.	Date Acquired	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol

SCHEDULE D – PART 3

Showing all Long-Term Bonds and Stocks **ACQUIRED** During Current Year

1 ~~CUSIP~~Security ~~Identification~~Identifier	2 Security ID Type	~~2~~3 Description	~~3~~4 Date Acquired	~~4~~5 Name of Vendor	~~5~~6 Number of Shares of Stock	~~6~~7 Actual Cost	~~7~~8 Par Value	~~8~~9 Paid for Accrued Interest and Dividends

SCHEDULE D – PART 4

Showing all Long-Term Bonds and Stocks **SOLD, REDEEMED** or Otherwise **DISPOSED OF** During Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10	Change In Book/Adjusted Carrying Value					~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20	~~20~~21
~~CUSIP~~ Security ~~Identifica-tion~~Identifier	Security ID Type	Description	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	~~10~~11 Unrealized Valuation Increase/ (Decrease)	~~11~~12 Current Year's (Amortization)/ Accretion	~~12~~13 Current Year's Other-Than-Temporary Impairment Recognized	~~13~~14 Total Change in B./A.C.V. (10+11-12)	~~14~~15 Total Foreign Exchange Change in B./A.C.V.	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Stated Contractual Maturity Date

SCHEDULE D – PART 5

Showing all Long-Term Bonds and Stocks **ACQUIRED** During Year and Fully **DISPOSED OF** During Current Year

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10	~~10~~11	Change in Book/Adjusted Carrying Value					~~16~~17	~~17~~18	~~18~~19	~~19~~20	~~20~~21
~~CUSIP~~Security ~~Identification~~Identifier	Security ID Type	Description	Date Acquired	Name of Vendor	Disposal Date	Name of Purchaser	Par Value (Bonds) or Number of Shares (Stock)	Actual Cost	Consideration	Book/ Adjusted Carrying Value at Disposal	~~11~~12 Unrealized Valuation Increase/ (Decrease)	~~12~~13 Current Year's (Amortization)/ Accretion	~~13~~14 Current Year's Other-Than-Temporary Impairment Recognized	~~14~~15 Total Change in B./A.C.V. (11+12-13)	~~15~~16 Total Foreign Exchange Change in B./A.C.V.	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Interest and Dividends Received During Year	Paid for Accrued Interest and Dividends

SCHEDULE D – PART 6 – SECTION 1

Valuation of Shares of Subsidiary, Controlled or Affiliated Companies

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	Stock of Such Company Owned by Insurer on Statement Date	
~~CUSIP Identification~~Security Identifier	Security ID Type	Description Name of Subsidiary, Controlled or Affiliated Company	NAIC Company Code	ID Number	NAIC Valuation Method	Book/Adjusted Carrying Value	Total Amount of Goodwill Included in Book/Adjusted Carrying Value	Nonadmitted Amount	~~9~~10 Number of Shares	~~10~~11 % of Outstanding

SCHEDULE D – PART 6 – SECTION 2

1	2	~~2~~3	~~3~~4	~~4~~5	Stock in Lower-Tier Company Owned Indirectly by Insurer on Statement Date	
~~CUSIP Identification~~Security Identifier	Security ID Type	Name of Lower-Tier Company	Name of Company Listed in Section 1 Which Controls Lower-Tier Company	Total Amount of Goodwill Included in Amount Shown in Column 7, Section 1	~~5~~6 Number of Shares	~~6~~7 % of Outstanding

SCHEDULE DB – PART C – SECTION 1

Replication (Synthetic Asset) Transactions Open as of December 31 of Current Year

Replication (Synthetic Asset) Transactions								Components of the Replication (Synthetic Asset) Transactions								
1	2	3	4	5	6	7	8	Derivative Instrument(s) Open			Cash Instrument(s) Held					
								9	10	11	12	13	~~13~~14	~~14~~15	~~15~~16	~~16~~17
Number	Description	NAIC Designation or Other Description	Notional Amount	Book/Adjusted Carrying Value	Fair Value	Effective Date	Maturity Date	Description	Book/Adjusted Carrying Value	Fair Value	~~CUSIP~~Security Identifier	Security ID Type	Description	NAIC Designation or Other Description	Book/Adjusted Carrying Value	Fair Value

SCHEDULE DB – PART D – SECTION 2

Collateral for Derivative Instruments Open December 31 of Current Year

Collateral Pledged by Reporting Entity

1	2	3	4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10
Exchange, Counterparty or Central Clearinghouse	Type of Asset Pledged	~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Fair Value	Par Value	Book/Adjusted Carrying Value	Maturity Date	Type of Margin (I, V or IV)

Collateral Pledged to Reporting Entity

1	2	3	4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10
Exchange, Counterparty or Central Clearinghouse	Type of Asset Pledged	~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Fair Value	Par Value	Book/Adjusted Carrying Value	Maturity Date	Type of Margin (I, V or IV)

SCHEDULE DL – PART 1
SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets reported in aggregate on Line 10 of the Assets page (Line 9 for Separate Accounts)
and not included on Schedules A, B, BA, D, DB and E)

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8
~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Restricted Asset Code	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Fair Value	Book/Adjusted Carrying Value	Maturity Date

SCHEDULE DL – PART 2
SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
and not reported in aggregate on Line 10 of the Assets page (Line 9 for Separate Accounts))

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8
~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Restricted Asset Code	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Fair Value	Book/Adjusted Carrying Value	Maturity Date

SCHEDULE E – PART 2 – CASH EQUIVALENTS

Show Investments Owned December 31 of Current Year

1 ~~CUSIP~~Security Identifier	2 Security ID Type	~~2~~3 Description	~~3~~4 Restricted Asset Code	~~4~~5 Date Acquired	~~5~~6 Rate of Interest	~~6~~7 Maturity Date	~~7~~8 Book/Adjusted Carrying Value	~~8~~9 Amount of Interest Due & Accrued	~~9~~10 Amount Received During Year

GENERAL INTERROGATORIES

30.2 If yes, complete the following schedule:

1 ~~CUSIP~~ Security Identifier#	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
30.2999 TOTAL		

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL & SEPARATE ACCOUNT

ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
REPLICATIONS (SYNTHETIC) ASSETS

1 RSAT Number	2 Type	3 ~~CUSIP~~Security Identifier	4 Security ID Type	~~4~~5 Description of Asset(s)	~~5~~6 NAIC Designation or Other Description of Asset	~~6~~7 Value of Asset	~~7~~8 AVR Basic Contribution	~~8~~9 AVR Reserve Objective	~~9~~10 AVR Maximum Reserve

QUARTERLY STATEMENT BLANK – HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

SCHEDULE BA – PART 2

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE During the Current Quarter

1	2	~~2~~3	Location		~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14
			~~3~~4	~~4~~5									
~~CUSIP Identification~~ Security Identifier	Security ID Type	Name or Description	City	State	Name of Vendor or General Partner	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	Date Originally Acquired	Type and Strategy	Actual Cost at Time of Acquisition	Additional Investment Made After Acquisition	Amount of Encumbrances	Commitment for Additional Investment	Percentage of Ownership

SCHEDULE BA – PART 3

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Quarter

1	2	~~2~~3	Location		~~5~~6	~~6~~7	~~7~~8	~~8~~9	Change in Book/Adjusted Carrying Value						~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20	~~20~~21
			~~3~~4	~~4~~5					~~9~~10	~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15						
~~CUSIP Identi-fication~~Security Identifier	Security ID Type	Name or Description	City	State	Name of Purchaser or Nature of Disposal	Date Originally Acquired	Disposal Date	Book/Adjusted Carrying Value Less Encumbrances, Prior Year	Unrealized Valuation Increase/ (Decrease)	Current Year's (Depreciation) or (Amortization) /Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Capitalized Deferred Interest and Other	Total Change in B./A.C.V. (9+10-11+12)	Total Foreign Exchange Change in B./A.C.V.	Book/ Adjusted Carrying Value Less Encumbrances on Disposal	Consi-deration	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Investment Income

SCHEDULE D – PART 3

Show All Long-Term Bonds and Stocks Acquired During the Current Quarter

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10
~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol

SCHEDULE D – PART 4

Show All Long-Term Bonds and Stocks Sold, Redeemed or Otherwise Disposed of
During the Current Quarter

1	2	~~2~~3	~~3~~4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10	Change In Book/Adjusted Carrying Value					~~15~~16	~~16~~17	~~17~~18	~~18~~19	~~19~~20	~~20~~21	~~21~~22
										~~10~~11	~~11~~12	~~12~~13	~~13~~14	~~14~~15							
~~CUSIP Identification~~Security Identifier	Security ID Type	Des-cription	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consider-ation	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Change in B./A.C.V. (10+11-12)	Total Foreign Exchange Change in B./A.C.V.	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol

SCHEDULE DB – PART C – SECTION 1

Replication (Synthetic Asset) Transactions Open as of Current Statement Date

Replication (Synthetic Asset) Transactions								Components of the Replication (Synthetic Asset) Transactions								
								Derivative Instrument(s) Open			Cash Instrument(s) Held					
1	2	3	4	5	6	7	8	9	10	11	12	13	~~13~~14	~~14~~15	~~15~~16	~~16~~17
Number	Description	NAIC Designation or Other Description	Notional Amount	Book/Adjusted Carrying Value	Fair Value	Effective Date	Maturity Date	Description	Book/Adjusted Carrying Value	Fair Value	~~CUSIP~~Security Identifier	Security ID Type	Description	NAIC Designation or Other Description	Book/Adjusted Carrying Value	Fair Value

SCHEDULE DB – PART D – SECTION 2

Collateral for Derivative Instruments Open as of Current Statement Date

Collateral Pledged by Reporting Entity

1	2	3	4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10
Exchange, Counterparty or Central Clearinghouse	Type of Asset Pledged	~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Fair Value	Par Value	Book/Adjusted Carrying Value	Maturity Date	Type of Margin (I, V or IV)

Collateral Pledged to Reporting Entity

1	2	3	4	~~4~~5	~~5~~6	~~6~~7	~~7~~8	~~8~~9	~~9~~10
Exchange, Counterparty or Central Clearinghouse	Type of Asset Pledged	~~CUSIP Identification~~Security Identifier	Security ID Type	Description	Fair Value	Par Value	Book/Adjusted Carrying Value	Maturity Date	Type of Margin (I, V or IV)

SCHEDULE DL – PART 1
SECURITIES LENDING COLLATERAL ASSETS
Reinvested Collateral Assets Owned Current Statement Date
(Securities lending collateral assets reported in aggregate on Line 10 of the Assets page
and not included on Schedules A, B, BA, D, DB and E)

1 ~~CUSIP Identification~~Security Identifier	2 Security ID Type	~~2~~3 Description	~~3~~4 Restricted Asset Code	~~4~~5 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	~~5~~6 Fair Value	~~6~~7 Book/Adjusted Carrying Value	~~7~~8 Maturity Dates

SCHEDULE DL – PART 2
SECURITIES LENDING COLLATERAL ASSETS
Reinvested Collateral Assets Owned Current Statement Date
(Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
and not reported in aggregate on Line 10 of the Assets page)

1 ~~CUSIP Identification~~Security Identifier	2 Security ID Type	~~2~~3 Description	~~3~~4 Restricted Asset Code	~~4~~5 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	~~5~~6 Fair Value	~~6~~7 Book/Adjusted Carrying Value	~~7~~8 Maturity Dates

SCHEDULE E – PART 2 – CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1 ~~CUSIP~~<u>Security Identifier</u>	<u>2</u> <u>Security ID Type</u>	~~2~~<u>3</u> Description	~~3~~<u>4</u> Restricted Asset Code	~~4~~<u>5</u> Date Acquired	~~5~~<u>6</u> Stated Rate Of Interest	~~6~~<u>7</u> Maturity Date	~~7~~<u>8</u> Book/Adjusted Carrying Value	~~8~~<u>9</u> Amount of Interest Due & Accrued	~~9~~<u>10</u> Amount Received During Year

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

DATE: 5/13/2026	**FOR NAIC USE ONLY**
CONTACT PERSON:	Agenda Item # 2026-16BWG
TELEPHONE:	Year 2027
EMAIL ADDRESS:	Changes to Existing Reporting [X]
ON BEHALF OF:	New Reporting Requirement [ ]
NAME: Kevin Clark	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT** No Impact [X] Modifies Required Disclosure [ ]
TITLE: Chair SAPWG	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
AFFILIATION: Iowa Insurance Division	**DISPOSITION**
ADDRESS:	[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date ________ [ ] Rejected Date ________ [ ] Deferred Date ________ [ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update the list of disclosure exclusions for Notes to Financial Statement Note 20C to remove investments accounted for under the equity method. Although the annual statement instruction change will not be reflected until 2027, it is anticipated that a SAPWG memo will be provided to the Blanks (E) Working Group to inform of this disclosure change for year-end 2026. As the current fair value disclosure for financial instruments has variable lines, reporting entities can incorporate the change to the disclosure, and include equity investments previously excluded for year-end 2026.

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

The purpose of this proposal is to eliminate the disclosure exclusion for “equity method investments” from the aggregate disclosure on financial instruments captured in *SSAP No. 100 – Fair Value*. (SAPWG Ref. 2026-06)

IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:________________

Other Comments:

**** This section must be completed on all forms.** **Revised 11/17/2022**

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 20 - Fair Value Measurements

Note 20C – Instruction:

C. A reporting entity shall disclose in the notes to the financial statements, as of each date for which a statement of financial position is presented in the quarterly or annual financial statements, the aggregate fair value or NAV for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall. This disclosure shall be summarized by the type of financial instrument for which it is practicable to estimate fair value, except for certain financial instruments identified below.

The disclosures about fair value prescribed in the paragraph above are not required for the following: (Note: These exclusions are specific to Note 20C and do not impact the reporting of fair value that may be required in other SSAPs or statutory accounting schedules.)

- Employers' and plans' obligations for pension benefits, other postretirement benefits (see scope paragraph of *SSAP No. 92—Postretirement Benefits Other Than Pensions*), postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements, as defined in *SSAP No. 12—Employee Stock Ownership Plans*, *SSAP No. 104—Share-Based Payments*, *SSAP No. 92—Postretirement Benefits Other Than Pensions* and *SSAP No. 102—Pensions*.
- Substantively extinguished debt subject to the disclosure requirements of *SSAP No. 103—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*.
- Insurance contracts, other than financial guarantees and deposit-type contracts
- Lease contracts as defined in *SSAP No. 22—Leases*.
- Warranty obligations and rights.
- ~~Investments accounted for under the equity method.~~
- Equity instruments issued by the entity.
- Deposit liabilities with no defined or contractual maturities.

Detail Eliminated To Conserve Space

Note 20C – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

C.

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Issuer Credit Obligations	$	$	$	$	$	$	$ ....
Asset-Backed Securities	....	....	....	....	....	....	....
Common Stock	....	....	....	....	....	....	....
Perpetual Preferred Stock	....	....	....	....	....	....	....
Mortgage Loans	....	....	....	....	....	....	....
Joint Ventures, LLCs, & Partnerships	....	....	....	....	....	....	....
SSAP No. 97 Equity Investments	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
Total	$	$	$	$	$	$	$

NOTE: Type of Financial Instrument Column shows examples of types of financial instruments that can be disclosed.

QUARTERLY STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 20 - Fair Value Measurements

C. A reporting entity shall disclose in the notes to the financial statements, as of each date for which a statement of financial position is presented in the quarterly or annual financial statements, the aggregate fair value or NAV for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall. This disclosure shall be summarized by the type of financial instrument for which it is practicable to estimate fair value, except for certain financial instruments identified below.

The disclosures about fair value prescribed in the preceding paragraph are not required for the following. (Note: These exclusions are specific to Note 20C and do not impact the reporting of fair value that may be required in other SSAPs or statutory accounting schedules.)

- Employers' and plans' obligations for pension benefits, other postretirement benefits (see scope paragraph of *SSAP No. 92—Postretirement Benefits Other Than Pensions*), postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements, as defined in *SSAP No. 12—Employee Stock Ownership Plans; SSAP No. 104—Share-Based Payments; SSAP No. 92—Postretirement Benefits Other Than Pensions;* and *SSAP No. 102—Pensions*.
- Substantively extinguished debt subject to the disclosure requirements of *SSAP No. 103—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*.
- Insurance contracts, other than financial guarantees and deposit-type contracts
- Lease contracts as defined in *SSAP No. 22—Leases*.
- Warranty obligations and rights.
- ~~Investments accounted for under the equity method.~~
- Equity instruments issued by the entity.
- Deposit liabilities with no defined or contractual maturities.

Detail Eliminated To Conserve Space

Note 20C – Illustration:

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR THE TABLE BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

C.

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Issuer Credit Obligations	$	$	$	$	$	$	$ ....
Asset-Backed Securities	....	....	....	....	....	....	....
Common Stock	....	....	....	....	....	....	....
Perpetual Preferred Stock	....	....	....	....	....	....	....
Mortgage Loans	....	....	....	....	....	....	....
Joint Ventures, LLCs, & Partnerships	....	....	....	....	....	....	....
SSAP No. 97 Equity Investments	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
....	....	....	....	....	....	....	....
Total	$	$	$	$	$	$	$

NOTE: Type of Financial Instrument Column shows examples of types of financial instruments that can be disclosed.

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		FOR NAIC USE ONLY
	DATE: **5/13/2026**	Agenda Item # 2026-17BWG
CONTACT PERSON:		Year 2027
		Changes to Existing Reporting [X]
TELEPHONE:		New Reporting Requirement [ ]
EMAIL ADDRESS:		**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
ON BEHALF OF:		No Impact [X] Modifies Required Disclosure [ ]
NAME:	**Kevin Clark**	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
TITLE:	**Chair SAPWG**	
AFFILIATION:	**Iowa Insurance Division**	**DISPOSITION**
ADDRESS:		[ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [X] Received For Public Comment [ ] Adopted Date ________ [ ] Rejected Date ________ [ ] Deferred Date ________ [ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: 1st Quarter 2027 / Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Update Annual General Interrogatory 25.04 & 25.05 to update “amount of collateral” to “assets lent”. Also update Note to Financial Note 5L(1) category “Collateral held under security lending agreements” to “Assets lent under security lending agreements”.

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

The purpose of this proposal is to clarify restricted asset reporting for securities lending transactions to prevent potential double-counting that could occur based on existing guidance and multiple references to “collateral”. For securities lending, the security lent (which is retained on the investment schedules) shall be identified as restricted. Then, the collateral received, if the collateral is reported on balance sheet, shall be identified as restricted. (SAPWG Ref. 2026-05)

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:________________

Other Comments:

** **This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

Detail Eliminated To Conserve Space

INVESTMENT

25. For the purposes of this interrogatory, "exclusive control" means that the company has the exclusive right to dispose of the investment at will, without the necessity of making a substitution thereof. For purposes of this interrogatory, securities in transit and awaiting collection, held by a custodian pursuant to a custody arrangement or securities issued subject to a book entry system are considered to be in actual possession of the company.

If bonds, stocks and other securities owned December 31 of the current year, over which the company has exclusive control are: (1) securities purchased for delayed settlement, or (2) loaned to others, the company should respond "NO" to 25.01 and "YES" to 26.1.

25.03 Describe the company's securities lending program, including value for collateral and amount of loaned securities, and whether the collateral is held on- or off-balance sheet. Note 17 of Notes to Financial Statement provides a full description of the program.

25.04 Report ~~amount of collateral for~~assets lent under security lending conforming programs as outlined in the Risk-Based Capital Instructions.

25.05 Report ~~amount of collateral~~assets lent for other (non-conforming) programs.

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

Restricted Asset Category	1 Total Gross (Admitted & Nonadmitted) Restricted from Current Year	2 Total Gross (Admitted & Nonadmitted) Restricted from Prior Year	3 Increase/ (Decrease) (1 minus 2)	4 Total Current Year Nonadmitted Restricted	5 Total Current Year Admitted Restricted (1 minus 4)	6 Gross (Admitted & Nonadmitted) Restricted to Total Assets (a)	7 Admitted Restricted to Total Admitted Assets (b)	8 Amount Reported in General Interrogatories	9 Difference from Note and GI	10 Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements										25.04 + 25.05
c. Subject to repurchase agreements										26.21

Detail Eliminated To Conserve Space

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted						
	Current Year					6	7
	1 Total General Account (G/A)	2 G/A Supporting S/A Activity (a)	3 Total Separate Account (S/A) Restricted Assets	4 S/A Assets Supporting G/A Activity (b)	5 Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	$	$
b. ~~Collateral held~~Assets lent under security lending agreements							
c. Subject to repurchase agreements							

Detail Eliminated To Conserve Space

Restricted Asset Category	Current Year						
	8	9	Percentage		12	13	14
	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	11 Admitted Restricted to Total Admitted Assets (d)	Amount Reported in General Interrogatories	Difference from Note and GI	Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements							25.04+25.05
c. Subject to repurchase agreements							26.21

Detail Eliminated To Conserve Space

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

This illustration includes the presentation of all restricted assets reported on the financial statements for a total comparison to total assets. This includes the items captured in SSAP No. 1, paragraphs 23.b. and 23.c. (Items captured in paragraph 23.c. should have a corresponding liability recognized, therefore there is no capture within the general interrogatories or capture as a noncontrolled asset in the RBC formula.)

(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted						
	Current Year					6	7
	1	2	3	4	5		
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Cell Account Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	$	$
b. ~~Collateral held~~Assets lent under security lending agreements							
c. Subject to repurchase agreements							

Detail Eliminated To Conserve Space

Restricted Asset Category	Current Year						
	8	9	Percentage		12	13	14
			10	11			
	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)	Amount Reported in General Interrogatories	Difference from Note and GI	Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements							25.04+25.05
c. Subject to repurchase agreements							26.21

ANNUAL STATEMENT BLANK – HEALTH, LIFE/FRATERNAL, PROPERTY, & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

Detail Eliminated To Conserve Space

INVESTMENT

25.01 Were all the stocks, bonds, and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 25.03) Yes [ ] No [ ]

25.02 If no, give full and complete information, relating thereto.

25.03 For securities lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 17 where this information is also provided)

25.04 For the reporting entity's securities lending program, report ~~amount of collateral for~~assets lent under security lending conforming programs as outlined in the risk- based capital instructions. $

25.05 For the reporting entity's securities lending program, report ~~amount of collateral~~assets lent for other (non-conforming) programs. $

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the total gross amount of restricted assets (current year, prior year, and the change between years), the total admitted of restricted assets, and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

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(1) Restricted Assets (Including Pledged)

	1	2	3	4	5	6	7	8	9	10
Restricted Asset Category	Total Gross (Admitted & Nonadmitted) Restricted from Current Year	Total Gross (Admitted & Nonadmitted) Restricted from Prior Year	Increase/ (Decrease) (1 minus 2)	Total Current Year Nonadmitted Restricted	Total Current Year Admitted Restricted (1 minus 4)	Gross (Admitted & Nonadmitted) Restricted to Total Assets (a)	Admitted Restricted to Total Admitted Assets (b)	Amount Reported in Annual General Interrogatories	Difference from Note and Annual GI	Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements										25.04 + 25.05
c. Subject to repurchase agreements										26.21

Detail Eliminated To Conserve Space

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting separate account activity, total separate account, separate account assets supporting general account activity and sum of the general account and the separate account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

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(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted						
	Current Year					6	7
	1 Total General Account (G/A)	2 G/A Supporting S/A Activity (a)	3 Total Separate Account (S/A) Restricted Assets	4 S/A Assets Supporting G/A Activity (b)	5 Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	$	$
b. ~~Collateral held~~Assets lent under security lending agreements							
c. Subject to repurchase agreements							

Detail Eliminated To Conserve Space

Restricted Asset Category	Current Year						
	8	9	Percentage		12	13	14
	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	11 Admitted Restricted to Total Admitted Assets (d)	Amount Reported in Annual General Interrogatories	Difference from Note and Annual GI	Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements							25.04+25.05
c. Subject to repurchase agreements							26.21

Detail Eliminated To Conserve Space

NOTES TO FINANCIAL STATEMENTS

Detail Eliminated To Conserve Space

Note 5L - Instruction:

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Disclose the total gross (admitted and nonadmitted) book/adjusted carrying value amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) by the reporting entity. Provide the gross amount of restricted assets (total general account, general account assets supporting protected cell account activity, total protected cell account, protected cell account assets supporting general account activity and sum of the general account and the protected cell account for current year, prior year, and the change between years), the total admitted of restricted assets and the percentage the restricted asset amount (gross and admitted) is of the reporting entity's total assets amount reported on Line 28 of the asset page (gross and admitted respectively) by the following categories:

a. Subject to contractual obligation for which liability is not shown

b. ~~Collateral held~~Assets lent under security lending agreements

c. Subject to repurchase agreements

Detail Eliminated To Conserve Space

Note 5L - Illustration:

L. Restricted Assets

THIS EXACT FORMAT MUST BE USED IN THE PREPARATION OF THIS NOTE FOR TABLES 5L(1) THROUGH 5L(5) BELOW. REPORTING ENTITIES ARE NOT PRECLUDED FROM PROVIDING CLARIFYING DISCLOSURE BEFORE OR AFTER THIS ILLUSTRATION.

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(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted						
	Current Year					6	7
	1	2	3	4	5		
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Cell Account Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	$	$	$	$	$	$	$
b. ~~Collateral held~~Assets lent under security lending agreements							
c. Subject to repurchase agreements							

Detail Eliminated To Conserve Space

Restricted Asset Category	Current Year						
	8	9	Percentage		12	13	14
			10	11			
	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)	Amount Reported in Annual General Interrogatories	Difference from Note and Annual GI	Annual GI Ref
a. Subject to contractual obligation for which liability is not shown	$	$	%	%	XXX	XXX	XXX
b. ~~Collateral held~~Assets lent under security lending agreements							25.04+25.05
c. Subject to repurchase agreements							26.21

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

<table>
<tr><td>

DATE: 7/15/2026

CONTACT PERSON: Charles Therriault

TELEPHONE: 212-386-1920

EMAIL ADDRESS: ctherriault@naic.org

ON BEHALF OF: Investment Designation Analysis (E) Working Group (IDAWG)

NAME: Ken Cotrone

TITLE: Chair IDAWG

AFFILIATION: Connecticut DOI

ADDRESS:

</td><td>

FOR NAIC USE ONLY

Agenda Item # 2026-18BWG
Year 2027
Changes to Existing Reporting [X]
New Reporting Requirement [ ]

REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT

No Impact [X]
Modifies Required Disclosure [ ]

Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]
****If Yes, complete question below****

DISPOSITION

[ ] Rejected For Public Comment
[ ] Referred To Another NAIC Group
[ ] Received For Public Comment
[ ] Adopted Date
[ ] Rejected Date
[ ] Deferred Date
[ ] Other (Specify)

</td></tr>
</table>

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Add an investment characteristic code on Schedule, D, Part 2, Sections 1 and 2 to identify investments that have a rating from a CRP that is an SVO Excluded Rating (ER).

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

The purpose of this proposal is to identify investments whose otherwise Filing Exempt (FE)-eligible NAIC Credit Rating Provider (CRP) rating was excluded from FE pursuant to NAIC discretion, by displaying an identifier in the investment characteristic column and not the NAIC Designation column. Although an investment's NAIC Designation could have initially been based on an excluded rating, its NAIC Designation could subsequently be based on other non-excluded CRP ratings also assigned to the investments. This separation of the investment characteristic identifier from the NAIC Designation will allow the source of the NAIC designation (FE, PLR, etc.) to be populated without being influenced by the excluded rating. Information on whether an excluded rating exists would then be identifiable via the investment characteristic column.

IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:

Other Comments:

**** This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

SCHEDULE D – PART 1- SECTION 1

LONG-TERM BONDS – ISSUER CREDIT OBLIGATIONS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 4 – NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol

Provide the appropriate NAIC Designation (1 through 6), NAIC Designation Modifier (A through G), and SVO Administrative Symbol combination for each security.

The listing of valid NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol combinations can be found on the NAIC's website for the Securities Valuation Office (*www.naic.org/svo.htm*).

The NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol will be shown as one column on the printed schedule but will be three sub-columns in the data table.

On the printed page the sub-columns should be displayed with a "." between the NAIC Designation and the NAIC Designation Modifier with a space between the NAIC Designation Modifier and the SVO Administrative Symbol (e.g., "1.A YE").

NAIC Designation Modifier:

The NAIC Designation Modifier should only be used for bonds eligible to receive one, as defined in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual), otherwise, the field should be left blank.

As defined in the P&P Manual, there is not an NAIC Designation Modifier for investments reporting an NAIC Designation 6, therefore, the NAIC Designation Modifier field should be left blank.

Refer to the P&P Manual for the application of these modifiers.

SVO Administrative Symbol:

Following are valid SVO Administrative Symbols for bonds. Refer to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* for the application of these symbols.

FE Filing Exempt

~~ER Securities with an excluded otherwise Eligible NAIC CRP Credit Rating(s)~~

FM Financially Modeled RMBS/CMBS subject to SSAP No. 43

Detail Eliminated To Conserve Space

Column 22 – Investment Characteristics

If an investment has one or more of the following characteristics, then list the appropriate number(s) separated by commas. If none of the characteristics apply, then leave the column blank.

1. Investment terms permit interest to be received in a form other than cash.

2. Investment terms permit payment of interest to be deferred without being considered past due.

3. Interest due and accrued has been written off as uncollectible and/or nonadmitted.

4. Investment has a current year or prior year recognized other-than-temporary impairment.

5. Investment is an interest-only strip

6. Investment is a principal-only strip

7. Investment reflects a To-Be-Announced (TBA) security that will qualify as an issuer credit obligation at the time the reporting entity takes possession of the issued security.

8. Investment has a rating from a CRP that is an SVO Excluded Rating (ER).

SCHEDULE D – PART 1 – SECTION 2

ASSET-BACKED SECURITIES OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 4 – NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol

Provide the appropriate NAIC Designation (1 through 6), NAIC Designation Modifier (A through G), and SVO Administrative Symbol combination for each security.

The listing of valid NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol combinations can be found on the NAIC's website for the Securities Valuation Office (*www.naic.org/svo.htm*).

The NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol will be shown as one column on the printed schedule but will be three sub-columns in the data table.

On the printed page the sub-columns should be displayed with a "." between the NAIC Designation and the NAIC Designation Modifier with a space between the NAIC Designation Modifier and the SVO Administrative Symbol (e.g., "1.A YE").

NAIC Designation Modifier:

The NAIC Designation Modifier should only be used for bonds eligible to receive one, as defined in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual), otherwise, the field should be left blank.

As defined in the P&P Manual, there is not an NAIC Designation Modifier for investments reporting an NAIC Designation 6, therefore, the NAIC Designation Modifier field should be left blank.

Refer to the P&P Manual for the application of these modifiers.

SVO Administrative Symbol:

Following are valid SVO Administrative Symbols for bonds. Refer to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* for the application of these symbols.

FE	Filing Exempt
~~ER~~	~~Securities with an excluded otherwise Eligible NAIC CRP Credit Rating(s)~~
FM	Financially Modeled RMBS/CMBS subject to SSAP No. 43

Detail Eliminated To Conserve Space

Column 23 – Investment Characteristics

If an investment has one or more of the following characteristics, then list the appropriate number(s) separated by commas. If none of the characteristics apply, then leave the column blank.

1. Investment terms permit interest to be received in a form other than cash.

2. Investment terms permit payment of interest to be deferred without being considered past due.

3. Interest due and accrued has been written off as uncollectible and/or nonadmitted.

4. Investment has a current year or prior year recognized other-than-temporary impairment.

5. Investment is an interest-only strip

6. Investment is a principal-only strip

7. Investment reflects a To-Be-Announced (TBA) security that will qualify as an issuer credit obligation or asset-backed security at the time the reporting entity takes possession of the issued security.

8. Investment has a rating from a CRP that is an SVO Excluded Rating (ER).

SCHEDULE D – PART 2 – SECTION 1

PREFERRED STOCKS OWNED DECEMBER 31 OF CURRENT YEAR

Detail Eliminated To Conserve Space

Column 19 – NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol

Provide the appropriate combination of NAIC Designation (1 through 6), NAIC Designation Modifier (A through G), and SVO Administrative Symbol for each security. The list of valid Administrative Symbols is shown below.

The listing of valid NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol combinations can be found on the NAIC's website for the Securities Valuation Office (*www.naic.org/svo.htm*).

Exchange Traded Funds should be reported as perpetual securities.

The NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol will be shown as one column on the printed schedule but will be three sub-columns in the data table.

On the printed page the sub-columns should be displayed with a "." between the NAIC Designation and the NAIC Designation Modifier with a space between the NAIC Designation Modifier and the SVO Administrative Symbol (e.g., "1.A YE").

Designation Modifier:

The NAIC Designation Modifier should only be used for securities eligible to receive one, as defined in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual), otherwise, the field should be left blank.

As defined in the P&P Manual, there is not an NAIC Designation Modifier for investments reporting an NAIC Designation 6, therefore, the NAIC Designation Modifier field should be left blank.

Refer to the P&P Manual for the application of these modifiers.

Following are valid administrative symbols for preferred stock. Refer to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* for the application of these symbols.

FE	Filing Exempt assigned by the SVO
~~ER~~	~~Securities with an excluded otherwise Eligible NAIC CRP Credit Rating(s)~~
YE	Year-end carry over assigned by the SVO

Detail Eliminated To Conserve Space

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

DATE: 7/30/2026	**FOR NAIC USE ONLY**
CONTACT PERSON: Eric King	Agenda Item # 2026-19BWG
TELEPHONE: 816-783-8234	Year 2027
EMAIL ADDRESS: eking@naic.org	Changes to Existing Reporting [X]
ON BEHALF OF:	New Reporting Requirement [ ]
NAME: Kevin Dyke	**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
TITLE: Chair, Health Actuarial (B) Task Force	No Impact [X] Modifies Required Disclosure [ ]
AFFILIATION: MI DIFS	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No] ****If Yes, complete question below****
ADDRESS: PO Box 30220 Lansing, MI 48909-7720	**DISPOSITION** [ ] Rejected For Public Comment [ ] Referred To Another NAIC Group [ ] Received For Public Comment [ ] Adopted Date ________ [ ] Rejected Date ________ [ ] Deferred Date ________ [ ] Other (Specify) ________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

The definition of "qualified health actuary" in the first paragraph of the Actuarial Opinion section of the Official NAIC Annual Statement Instructions Health For the 2027 reporting year.

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

To align the skills and knowledge needed to meet the criteria needed to be considered a qualified actuary as it relates to signing the Health Annual Statement Actuarial Opinion with the revised Society of Actuaries Fellow curriculum.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:

Other Comments:

**** This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS –HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

ACTUARIAL OPINION

1. There is to be included on or attached to Page 1 of the annual statement, the statement of the appointed actuary setting forth his or her opinion relating to claim reserves and any other actuarial items. The appointed actuary must be a qualified health actuary appointed by the board of directors, or its equivalent, or by a committee of the board, by December 31 of the calendar year for which the opinion is rendered. Within five business days of the appointment, the company shall notify the domiciliary commissioner of the name, title (and, in the case of a consulting actuary, the name of the firm) and manner of appointment or retention of each person appointed or retained by the company as an appointed actuary and shall state in the notice that the person meets the requirements of a qualified health actuary. Once these notices are furnished, no further notice is required with respect to this person unless the actuary ceases to be appointed or retained or ceases to meet the requirements of a qualified health actuary. "Qualified health actuary," as used herein means a member in good standing of the American Academy of Actuaries, or a person recognized by the American Academy of Actuaries as qualified for such actuarial valuation, and an actuary who meets the requirements in the Knowledge Statements for Appointed Actuary for Health Blank. The Knowledge Statements for Appointed Actuary for the Health Blank can be found at https://content.naic.org/sites/default/files/inline-files/Health%20Knowledge%20Statements%20adopted%20by%20HATF%204.20.26.pdf.

Detail Eliminated To Conserve Space

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NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		FOR NAIC USE ONLY
	DATE: 8/11/2026	Agenda Item # 2026-20BWG
		Year 2027
CONTACT PERSON:		Changes to Existing Reporting [X]
TELEPHONE:		New Reporting Requirement [ ]
EMAIL ADDRESS:		**REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT**
ON BEHALF OF:		No Impact [X]
		Modifies Required Disclosure [ ]
NAME:	Mary Caswell and Jill Youtsey	Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? [No]
TITLE:		****If Yes, complete question below****
AFFILIATION:	NAIC	**DISPOSITION**
ADDRESS:		[ ] Rejected For Public Comment
		[ ] Referred To Another NAIC Group
		[ ] Received For Public Comment
		[ ] Adopted Date ________________
		[ ] Rejected Date ________________
		[ ] Deferred Date ________________
		[ ] Other (Specify) ________________

BLANK(S) TO WHICH PROPOSAL APPLIES

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

Anticipated Effective Date: Annual 2027

IDENTIFICATION OF ITEM(S) TO CHANGE

Add an interrogatory question to General Interrogatory #40 to ask if a reporting entity has residuals or not.

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

The purpose of this proposal is to clarify if a reporting entity has residuals or not. The current interrogatory #40 could be left blank and the assumption would be that the reporting entity did not hold residuals, but it could also mean the reporting entity forgot to answer interrogatory #40. The new question will be a Yes or No question if the reporting entity holds residuals and will help clarify the reporting of the other questions for interrogatory #40.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date:______________________________

Other Comments:

** **This section must be completed on all forms.** **Revised 11/17/2022**

ANNUAL STATEMENT INSTRUCTIONS – HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

INVESTMENT

Detail Eliminated To Conserve Space

40.~~1~~2 Indicate whether the reporting entity utilizes the Practical Expedient (PE) or Allowable Earned Yield (AEY) method for residuals, or if the reporting entity is transitioning (T) from PE to AEY. All residuals held by a company shall follow the same measurement method unless the company is transitioning from the PE to AEY method. See *SSAP No. 21—Other Admitted Assets*. Leaving the interrogatory blank is an acceptable response only if Interrogatory 40.1 was answered NO.

40.~~2~~3 If the company is transitioning from the Practical Expedient (PE) to Allowable Earned Yield (AEY) method, what is the transition date to apply the AEY method? (Under SSAP No. 21, residuals acquired prior to the transition date shall continue the PE method, whereas residuals acquired after the transition date shall follow the AEY method.)

ANNUAL STATEMENT BLANK – HEALTH, LIFE/FRATERNAL, PROPERTY & TITLE

GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

INVESTMENT

Detail Eliminated To Conserve Space

40.1 Does the reporting entity have residuals? Yes [ ] No [ ]

40.2~~1~~ If yes, ~~For residuals,~~ does the company utilize the Practical Expedient or Allowable Earned Yield method for residuals? (Enter PE or AEY for the method the company utilizes, unless the company is transitioning from the PE to AEY method, then enter T.)

40.3~~2~~ If the answer to 40.2 is T, (i.e., the company is transitioning from the Practical Expedient (PE) to Allowable Earned Yield (AEY) method), what is the transition date to apply the AEY method? (Under SSAP No. 21, residuals acquired prior to the transition date shall continue the PE method, whereas residuals after the transition date shall follow the AEY method.) ________________

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Blanks (E) Working Group
Editorial Revisions to the Blanks and Instructions
(presented at the August 26, 2026, Meeting)

Statement Type:
H = Health; **L/F** = Life/Fraternal Combined; **P/C** = Property/Casualty; **SA** = Separate Accounts; **T** = Title

Effective	Table Name	Description	Statement Type	Filing Type
2026	Life Supplement to the Health Annual Statement	**CHANGE TO INSTRUCTION** Update Column 1 on Exhibit 5 in the Life Supplement to match Life/Fraternal Exhibit 5. Column 1 – Valuation Standard **** Detail Eliminated to Conserve Space**** **Mortality and Morbidity** **** Detail Eliminated to Conserve Space**** 2001 CSO ....Commissioners 2001 Standard Ordinary Table or any modification of such table adopted by the NAIC. 2017 CSO ....Commissioners 2017 Standard Ordinary Table or any modification of such table adopted by the NAIC. 2017 CSGI ....Commissioners 2017 Standard Guaranteed Issue Table or any modification of such table adopted by the NAIC. **** Detail Eliminated to Conserve Space**** 2012 IAR ....2012 Individual Annuity Reserve Mortality Table **Valuation Method** **** Detail Eliminated to Conserve Space**** VM-20NPR ....Net Premium Reserve Component of VM-20 Reserve. VM-20DET/STO ....Deterministic/Stochastic Reserve Component of VM-20 Reserve (Excess over Net Premium Reserve).	H	Annual

Effective	Table Name	Description	Statement Type	Filing Type
		VM-V ....Any CARVM Reserve Calculated Using Valuation Interest Rates Defined in Section VM-V of the *Valuation Manual*. VM-22CSV ....Cash surrender component of VM-22 reserve. VM-22DET/STO ....Deterministic/Stochastic Reserve Component Using Section VM-22 of the *Valuation Manual*. (Reported reserve excess over CSV. If there is no CSV, report the full reported reserve.		
2026	Life Supplement to the Health Annual Statement	**CHANGE TO INSTRUCTION** Update the Life Insurance definition on Exhibit 5 in the Life Supplement to match Life/Fraternal Exhibit 5. **Life Insurance** Include the reserve for future transfers of unaccrued tabular net premiums to the end of the current contract year for variable life insurance contracts. For any life insurance business valued under Section VM-20 of the *Valuation Manual*, include the total CRVM reserve required by VM-20 split into the following components with each component on a separate line: The Net Premium Reserve identifying the valuation basis The balance of the total required (Excess over Net Premium)	H	Annual

Effective	Table Name	Description	Statement Type	Filing Type
2026	Life Supplement to the Health Annual Statement	**CHANGE TO INSTRUCTION** Add the Annuities definition on Exhibit 5 in the Life Supplement to match Life/Fraternal Exhibit 5. **Annuities** For any annuity contracts valued using valuation interest rates defined in Section VM-22 of the *Valuation Manual,* include the reserve for Jumbo and Non-Jumbo contracts on separate lines in 50 basis point valuation interest rate intervals. For example, typical entries in Exhibit 5 might be: 1. 2012 IAR VM-V Jumbo 2% - 2.49%....................... …2018 – 20XX 2. 2012 IAR VM-V Jumbo 2.5% - 2.99%….................. …2018 – 20XX 3. 2012 IAR VM-V Non-Jumbo 2% - 2.49%............... …2018 – 20XX 4. 2012 IAR VM-V Non-Jumbo 2.5% - 2.99%............ …2018 – 20XX	H	Annual

<table>
<tr><th>Effective</th><th>Table Name</th><th>Description</th><th>Statement Type</th><th>Filing Type</th></tr>
<tr><td>2026</td><td>Schedule BA, General Instructions</td><td>CHANGE TO INSTRUCTION

Add a clarification to the Schedule BA, Part 1 instructions to clarify that securities in the NAIC Designation Assigned by the Securities Valuation Office (SVO) line categories should not be using FE Administrative Symbols.

<u>SCHEDULE BA – PARTS 1, 2, AND 3</u>

<u>OTHER LONG-TERM INVESTED ASSETS – GENERAL INSTRUCTIONS</u>

Include only those classes of invested assets not clearly or normally includable in any other invested asset schedule, or that have been specifically identified for reporting on Schedule BA: Other Long-Term Invested Assets. Investments shall be reported in the designated reporting category and reporting line that represents the investment. Investments that do not fit within any specific reporting line shall be captured as an “Any Other Class of Asset”.

For accounting guidance related to foreign currency transactions and translations, refer to SSAP No. 23—Foreign Currency Transactions and Translations.

If a reporting entity has any detail lines reported for any of the following required groups, categories, or subcategories, it shall report the subtotal amount of the corresponding group, category, or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

<u>Note: Line categories “NAIC Designations Assigned by the SVO” are specifically assigned by that office and do not include investments with designation suffixes of FE, RT, F, Z*, ND*, IF, PL, PLGI, Z, FMC, and FMR.</u></td><td>H, L/F, P/C, T, SA</td><td>Annual</td></tr>
</table>

<table>
<tr><th>Effective</th><th>Table Name</th><th>Description</th><th>Statement Type</th><th>Filing Type</th></tr>
<tr><td>2026</td><td>Schedule BA, Part 1</td><td>CHANGE TO INSTRUCTION

Add a clarification to the Schedule BA, Part 1 instructions to clarify that securities in the NAIC Designation Assigned by the Securities Valuation Office (SVO) line categories should not be using FE Administrative Symbols.

Column 7 – NAIC Designation, NAIC Designation Modifier, and SVO Administrative Symbol
Detail Eliminated to Conserve Space
SVO Administrative Symbol:

Following are valid SVO Administrative Symbols for bonds and preferred stock. Refer to the P&P Manual for the application of these symbols.

<u>Note: Line categories “NAIC Designations Assigned by the SVO” are specifically assigned by that office and do not include investments with designation suffixes of FE, RT, F, Z*, ND*, IF, PL, PLGI, Z, FMC, and FMR.</u>

YE Year-end carry over
FE Filing Exempt (Limited use on this schedule. See P&P Manual for details)
RT Regulatory Transaction
RTS Regulatory Transaction - SVO Reviewed
RTIF Regulatory Transaction - Initial Filing Submitted to SVO
RTSYE Regulatory Transaction - SVO Reviewed - Year-end carry over
F Sub-paragraph D Company – insurer self-designated
Z* Regulatory review initiated by either the SVO Director, Financial Condition (E) Committee, Executive (EX) Committee or VOSTF.
ND* Regulatory review for an assessment of regulatory policy for the investment or regulatory reporting instructions to implement applicable policy.</td><td>H, L/F, P/C, T, SA</td><td>Annual</td></tr>
</table>

<table>
<tr><th>Effective</th><th>Table Name</th><th>Description</th><th>Statement Type</th><th>Filing Type</th></tr>
<tr><td>2026</td><td>Asset Valuation Reserve</td><td>

CHANGE TO BLANK

Update columns 2 and 3, line A07 to block entry as there are no amount to summarize.

<table>
<tr><th>Line Number</th><th>NAIC Desig-nation</th><th>Description</th><th>1
Book/ Adjusted Carrying Value</th><th>2
Reclassify Related Party Encumbrances</th><th>3
Add Third Party Encumbrances</th></tr>
<tr><td>SECTION A</td><td></td><td>COMMON STOCK</td><td></td><td></td><td></td></tr>
<tr><td>1</td><td></td><td>Unaffiliated public</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>2</td><td></td><td>Unaffiliated private</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>3</td><td></td><td>Federal Home Loan Bank</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>4</td><td></td><td>Affiliated life with AVR</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>5</td><td></td><td>Affiliated - certain other (See SVO Purposes & Procedures Manual)</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>6</td><td></td><td>Affiliated - all other</td><td></td><td>XXX</td><td>XXX</td></tr>
<tr><td>7</td><td></td><td>Total common stock (Sum of Lines A1 through A6)</td><td></td><td>XXX</td><td>XXX</td></tr>
</table>

</td><td>L/F, SA</td><td>Annual</td></tr>
<tr><td>2026 / 2027</td><td>Notes to Financial Statement</td><td>

CHANGE TO INSTRUCTION

Update Note 1C6 illustration because the stated value is different for asset-backed securities and non-bond debt securities. This is a narrative illustration to Note 1C6 so the wording in the instructions is an example.

(6) Asset-backed securities (ABS) ~~and non-bond debt securities~~ are stated at either amortized cost or the lower of amortized cost or fair value. ~~The retrospective adjustment method is used to value all securities, except for interest only securities or securities where the yield had become negative, that are valued using the prospective method~~The company has elected use of the prospective method for all ABS. Non-bond debt securities are reported at the lower of amortized cost or fair value.

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

Effective	Table Name	Description	Statement Type	Filing Type
2027	General Interrogatory Part 1	**CHANGE TO BLANK** Add Cash Equivalents to quarterly general interrogatory #13.2. In adopted proposal 2026-09BWG cash equivalents were added to the Five Year Historical. There is a crosscheck between the Five Year Historical and Quarterly General Interrogatory, so cash equivalents need to be added to the quarterly general interrogatory.	H, L/F, P/C, T	Quarterly

13.2 If yes, please complete the following:

		1 Prior Year-End Book/Adjusted Carrying Value
13.21	Bonds	$
13.22	Preferred stock	$
13.23	Common stock	$
13.24	Short-term investments & Cash Equivalents	$
13.25	Mortgage loans on real estate	$
13.26	All other	$
13.27	Total investment in parent, subsidiaries and affiliates (subtotal lines 13.21to 13.26)	$
13.28	Total investment in parent included in lines 13.21 to 13.26 above)	$

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Blanks (E) Working Group
Summary of Comments for August 26, 2026
National Meeting

ITEMS RECEIVED FOR COMMENT

Reference Number	Description	
2025-29BWG	Update Investment Schedules General Instructions restricted asset codes to add codes that were previously added to Notes to Financial Statements Note 5L – Restricted Assets for reporting funds withheld and modified coinsurance (modco) arrangements.	
Comment #1 – Industry Interested Parties	Attachment 14	Page 1 of 7
	IPs recommend deferring proposal until sponsor’s agenda item is adopted. See full comment letter for details.	

2026-10BWG	Update Life/Fraternal Liability lines 24.03 and 24.07 to add reference to use the BACV and an annual crosscheck to Schedule S. Add reference to use the BACV value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20.	
Comment #1 – Industry Interested Parties	Attachment 14	Page 1 of 7
	IPs recommend deferring proposal until sponsor’s agenda item is adopted. They also suggest adding Health and Health (Life Supplement) to the statement types with updates. See full comment letter for details.	

2026-13BWG Modified	Add an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state.	
Comment #1 – Industry Interested Parties	Attachment 14	Page 1 of 7
	IPs have no comment.	

2026-14BWG	Update Schedule P instructions with revisions exposed at the Casualty Actuarial and Statistical (C) Task Force.	
Comment #1 – Industry Interested Parties	Attachment 14	Page 1 of 7
	IPs have no comment.	

Reference Number	Description		
2026-15BWG Modified	Update the "CUSIP" column throughout the annual and quarterly investment schedules to be a "Security Identifier" column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. Add a Security ID Type column to the investment schedules to identify what security identifier is being used. Update references to CUSIP throughout the annual and quarterly statements to the security identifier when the instructions are not specifically referring to CUSIP.		
Comment #1 – Industry Interested Parties		Attachment 14	Page 2 of 7
	IPs suggest updating CUSIP to Security Identifier in the Notes to Financial Statements and General Interrogatories. See full comment letter for details.		
Comment # 2 – Intercontinental Exchange, Inc (ICE)		Attachment 14	Page 3-5 of 7
	IP suggests adding the ICEID number to the list of security identifiers. See full comment letter for details.		
Comment # 3 – Open Symbology & FIGI		Attachment 14	Page 6-7 of 7
	IP suggests adding the FIGI number to the list of security identifiers. See full comment letter for details.		

2026-16BWG	Update the list of disclosure exclusions for Notes to Financial Statements Note #20C to remove investments accounted for under the equity method.		
Comment #1 – Industry Interested Parties		Attachment 14	Page 2 of 7
	IPs recommend deferring proposal until sponsor's agenda item is adopted. See full comment letter for details.		

2026-17BWG	Update Annual General Interrogatory 25.04 and 25.05 changing "amount of collateral" to "assets lent." Update Notes to Financial Statements Note #5L(1) category "Collateral held under security lending agreements" to "Assets lent under security lending agreements."		
Comment #1 – Industry Interested Parties		Attachment 14	Page 2 of 7
	IPs recommend deferring proposal until sponsor's agenda item is adopted. See full comment letter for details.		

NAIC Blanks Working Group – Interested Parties

July 27, 2026

Mr. Roy Eft, Chair
Blanks (E) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000
Kansas City, MO 64106-2197

SUBJECT: Blanks (E) Working Group ("BWG") proposals exposed, re-exposed or deferred during the conference call on Thursday, May 28, 2026

Dear Mr. Eft:

Interested Parties ("IPs") appreciate the opportunity to review and comment on the 7 items that were exposed or re-exposed/deferred during the conference call held by BWG on Thursday, May 28, 2026, with a comment deadline of Monday, July 27, 2026.

2025-29BWG [Updates include revising the Investment Schedules General Instructions for the Restricted Asset Code column to add codes that were previously added to Notes to Financials, Note 5L – Restricted Assets, for reporting funds withheld and Modco arrangements. This item is sponsored by SAPWG Ref #2025-27 – *SSAP No. 1 Modco & FWH Code*. Anticipated effective date is Annual 2027 / 1st Quarter 2028.]

IPs recommend continuing deferral of this item until SAPWG has adopted the sponsoring item Ref #2025-27.

2026-10BWG [Updates include modifying the Life/Fraternal Liability Lines 24.03 and 24.07 to add reference to use the book/adjusted carrying value and an annual crosscheck to Schedule S. Also, add reference to use the book/adjusted carrying value to Schedule S, Part 3, Section 1, Column 15; Schedule S, Part 3, Section 2, Column 14; Schedule S, Part 4, Column 12; and Schedule S, Part 5, Column 20. This item is sponsored by SAPWG Ref #2026-02 – *SSAP No. 61 (Valuation of Funds Withheld Liability)*. Anticipated effective date is Annual 2027.]

IPs recommend continuing deferral of this item until SAPWG has adopted the sponsoring item Ref #2026-02. Also, IPs believe that the boxes for the 'Health' and 'Health (Life Supplement)' blanks should be checked for their respective pages.

2026-13BWG [Updates include adding an active status code column to Cybersecurity Insurance Coverage Supplement Part 5 and to Private Flood Insurance Supplement Parts 2 through 6 to identify the active status for each state. The purpose of the addition of the "Active Status" column is to allow a user to determine if the policies are being written in the admitted or nonadmitted market. Anticipated effective date is Annual 2027.]

IPs have no comment.

2026-14BWG [Updates include revising the Schedule P instructions which is a continuation of the project that adopted items in 2025-07BWG – *Update Schedule P with editorial revisions*. This item is sponsored by the Casualty Actuarial and Statistical (C) Task Force. Anticipated effective date is Annual 2027.]

IPs have no comment.

2026-15BWG [Updates include revising the "CUSIP" column throughout the annual and quarterly investment schedules to be a "Security Identifier" column to allow for different types of identifiers, such as CUSIP, CINS, PPN, ISIN, and LXID. The purpose of this proposal is to improve investment security identification and integration with other NAIC systems, data, and reporting. This item is sponsored by the Investment Designation Analysis (E) Working Group. Anticipated effective date is 1st Quarter 2027 / Annual 2027.]

IPs recommend including changing "CUSIP" to "Security Identifier" in the Notes to Financial Statements and General Interrogatories where needed.

2026-16BWG [Updates include revising the list of disclosure exclusions for Notes to Financial Statement Note 20C to remove investments accounted for under the equity method. Although the annual statement instruction change will not be reflected until 2027, it is anticipated that a SAPWG memo will be provided to BWG to inform of this disclosure change for year-end 2026. As the current fair value disclosure for financial instruments has variable lines, reporting entities can incorporate the change to the disclosure, and include equity investments previously excluded for year-end 2026. The purpose of this proposal is to eliminate the disclosure exclusion for "equity method investments" from the aggregate disclosure on financial instruments captured in SSAP No. 100 – Fair Value. This item is sponsored by SAPWG Ref #2026-06 – *Fair Value Disclosures*. Anticipated effective date is 1st Quarter 2027 / Annual 2027.]

IPs recommend deferring this item until SAPWG has adopted the sponsoring item Ref #2026-06 as significant issues need to be evaluated and resolved on the SAPWG proposal before the reporting changes can be effective.

2026-17BWG [Updates include revising Annual General Interrogatory 25.04 & 25.05 to update "amount of collateral" to "assets lent". Also, revise Notes to Financial Statement 5L(1) category "Collateral held under security lending agreements" to "Assets lent under security lending agreements". The purpose of this proposal is to clarify restricted asset reporting for securities lending transactions to prevent potential double-counting that could occur based on existing guidance and multiple references to "collateral". This item is sponsored by SAPWG Ref #2026-05 – *Securities Lending – Restricted Assets*. Anticipated effective date is 1st Quarter 2027 / Annual 2027.]

IPs recommend deferring this item until SAPWG has adopted the sponsoring item Ref #2026-05.

* * * *

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

Tip Tipton, CPA
VP – Accounting Policy
American Council of Life Insurers
TipTipton@acli.com
202-624-2015

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

July 27, 2026

Mr. Roy Eft
Chair, Blanks (E) Working Group
National Association of Insurance Commissioners

Subject: NAIC Blanks (E) Working Group 2026-15BWG Exposure

Dear Mr. Eft,

We are writing to provide our comments on the Blanks Working Group's proposed amendments allowing for additional security identifiers to be used in quarterly and annual filings.

Intercontinental Exchange, Inc. (ICE) has a longstanding relationship with the NAIC as a provider of financial data and services. Our comments concern the ICE ID, a new identifier from ICE Private Credit Intelligence (IPCI), an initiative ICE launched in partnership with Apollo, and why we believe its acceptance as a security identifier for insurance company regulatory filings would be beneficial.

IPCI is an industry-wide initiative to bring more transparency and increased liquidity to the private credit market. A foundational aspect of this initiative is the ICE ID, a permanently unique, anonymous identifier assigned to each private credit deal at inception. The ICE ID allows for consistent tracking of a private credit instrument across its entire lifecycle, improving transparency and ease of transfer for all investors in the private credit market, including insurance companies regulated by the NAIC's member commissioners.

Using the ICE ID, IPCI provides structured terms & conditions for private credit instruments along with permissioned sharing of that information. With the ICE ID, investors can easily track a private credit instrument from inception through each lifecycle event all the way to maturity. It also allows the terms and conditions of an instrument to be provided to permissioned, potential investors, in a standardized, easy to ingest format, streamlining the exchange of information in the secondary market.

The ICE ID will also ease the regulatory reporting burden for investors, as structured, up to date terms and conditions for an instrument can efficiently be pulled via the ICE ID for use in regulatory filings. Ultimately, the ICE ID is laying the ground work for secondary trading capability, enabling enhanced liquidity for the asset class, which will directly benefit insurance companies and other market participants.

To allow insurance companies to benefit from these enhancements as soon as possible, IPCI requests that the ICE ID be included as an additional eligible Security Identifier Type in the BLANKS proposed amendments with an anticipated effective date of 1st Quarter 2027 / Annual 2027. Attached is a mark-up of the proposed amendments, which shows the minor updates that would need to be made in order to include the ICE ID.

Accepting the ICE ID for regulatory filing purposes will bring the SVO into the standardization ecosystem and further solidify the continued move towards transparency for the asset class.

ICE Data Services
1345 Avenue of the Americas
7th Floor
New York, NY 10105
Tel: +1 212.748.4000 I Fax: +1 212.748.4005
ice.com

With the benefit of SVO acceptance, IPCI will be able to provide insurance companies with the ability to fully integrate the ICE ID into their systems. Further, because ICE IDs will be assigned at instrument inception, following the ICE ID implementation we expect the SVO to see a meaningful reduction in the number of private credit investments with a missing assigned identifier.

Currently, approximately 3,000 private credit instruments totaling approximately $1 trillion in notional outstanding have been assigned an ICE ID, with over 200 insurance companies holding one or more of those instruments on their balance sheets, meaning that insurance company investors in those instruments could begin using the ICE ID in their filings immediately upon adoption by the SVO.

The benefits of the ICE ID extend well beyond the efficiency of any single filing. Private credit has drawn sustained attention from domestic and international supervisors alike, including the NAIC, the Financial Stability Board, and the International Monetary Fund, much of it centered on a single recurring concern: that the asset class has grown faster than the data infrastructure available to observe it. The ICE ID helps address that concern on its own terms, supplying a consistent, lifecycle-long identifier where none previously existed and converting a frequently cited transparency gap into standardized, machine-readable information available to regulators and market participants alike. By adopting it, the SVO and the NAIC's member commissioners would demonstrate that the transparency of private credit can be advanced through the combination of a mature, state-based regulatory framework and market-led infrastructure, rather than through prescriptive mandates imposed from outside that system. That is a distinctively American answer to a question global standard-setters are still framing, and it would keep the NAIC and the United States at the forefront of a debate that supervisors in Europe and Asia are watching closely.

In order to ensure that the SVO is able to confirm the ICE ID provided in a filing is correctly associated with the applicable instrument, IPCI is able to provide a data feed to the SVO with the ICE IDs and instrument identifying information directly or through a third-party vendor. Likewise, IPCI is working with the NRSROs to include the ICE ID in their feeds and can work directly with the SVO to ensure that data feeds are in place by the time the amendments take effect. Further, IPCI can work with the SVO to create custom data feeds that would be helpful for the SVO’s use of the ICE IDs.

Thank you for your time and consideration. We would be happy to answer any questions or supply additional materials in support of our request.

Sincerely,

Varun V Pawar

Varun V Pawar (Jul 27, 2026 14:11:32 EDT)

Varun Pawar
Chief Product Officer, Data Services

ICE Data Services
1345 Avenue of the Americas
7th Floor
New York, NY 10105
Tel: +1 212.748.4000 I Fax: +1 212.748.4005
ice.com

Enclosure: Proposed Amendments, Exposure Draft 2026-15BWG

cc: Mr. Charles Therriault, Director, Securities Valuation Office

From: Caswell, Mary
To: Youtsey, Jill
Subject: FW: Introduction to FIGI and Potential Relevance to the Blanks Working Group
Date: Wednesday, August 5, 2026 9:17:16 AM
Attachments: NAIC_FIGI_examples.xlsx

From: Karen Cacella (BLOOMBERG/ PRINCETON) <kcacella@bloomberg.net>
Sent: Tuesday, August 4, 2026 8:56 AM
To: Caswell, Mary <MCaswell@naic.org>
Subject: Introduction to FIGI and Potential Relevance to the Blanks Working Group

Hi Mary,

I hope you're doing well. I had previously reached out regarding the Blanks Working Group proposal but wasn't sure if my message reached the appropriate contact. I came across your name and thought I'd introduce myself directly.

My name is Karen Cacella, and I work with the Financial Instrument Global Identifier (FIGI) standard. I recently had the opportunity to review the Blanks Working Group proposal regarding the transition from a CUSIP-specific field to a more flexible **"Security Identifier"** field supporting multiple identifier types. The proposal's objective of improving investment security identification and integration across NAIC systems immediately caught my attention.

FIGI is an open, global financial instrument identifier standard governed by the Object Management Group (OMG), which operates as a Standards Development Organization under the Enterprise Data Management (EDM) Association. Bloomberg serves as the Registration Authority, and FIGIs are issued by OMG-approved Certified Providers, currently Bloomberg and Kaiko. FIGIs are freely available through OpenFIGI.com and the OpenFIGI API at no cost and may be freely used and redistributed.

Given the Working Group's focus on improving security identification, data quality, and interoperability, I thought FIGI might be of interest as a complementary identifier. FIGI provides persistent, instrument-level identifiers across global asset classes and can help facilitate consistent identification and integration across reporting systems, reference data, and operational workflows.

To illustrate the breadth of FIGI coverage, I've attached a spreadsheet with examples of FIGIs for a variety of fund types relevant to insurance investment reporting.

If it would be helpful, I'd welcome the opportunity to schedule a brief call to introduce FIGI and discuss whether it could support the Working Group's objectives or future initiatives.

Thank you for your time, and I look forward to hearing from you.

Best regards,
Karen Cacella

Karen Cacella
Open Symbology & FIGI
Tel: 1-609-279-3678
Email: kcacella@bloomberg.net
To learn more about FIGI:
https://www.openfigi.com/

The Financial Instrument Global Identifier (FIGI), is owned by the non-profit Object Management Group (OMG), which operates as a Standards Development Organization under the Enterprise Data Management (EDM) Association. It is available as a free, open standard for identifying financial instruments under the MIT open standard license.

The FIGI standard is a metadata rich identification system that integrates with older, legacy symbologies to address data fragmentation and foster interoperability across capital markets through a single, consistent format for all global asset classes. FIGIs are issued by Certified Providers under the standard, currently Bloomberg and Kaiko as approved by OMG.

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