

2024 Principle-Based Reserves (PBR) Review Report

From: Valuation Analysis (E) Working Group

To: Life Insurance Companies Subject to VM-20 and/or VM-21
Interested Regulators

RE: Findings from Review of 2024 PBR Actuarial Reports

I. Executive Summary

The Valuation Analysis (E) Working Group (VAWG) reviewed the 2024 PBR Actuarial Reports, covering life insurance and/or variable annuities. A summary of the main findings, high-level feedback, and additional VM-31 reporting considerations is available. The intent is to provide general feedback to assist companies with future PBR valuations and filings, and to aid state insurance regulators in their PBR reviews.

II. Summary Findings

The American Academy of Actuaries (Academy) hosted a webinar, [PBR: VM-31 as Seen by Regulators](#), on Dec. 12, 2025, where the presenters discussed findings from the review of the 2024 PBR Actuarial Reports, along with other related information. The [slides](#) from this webinar are available on the Academy's website.

III. Applicable Findings from Prior VAWG PBR Review Reports

There were many findings from the review of the 2024 PBR Actuarial Reports that were similar to those from prior years. Please find previous review reports on the [VAWG webpage](#) of the NAIC website to see additional details.

IV. Limitations

The analysis presented relies on the information submitted by companies in their VM-20 Reserves Supplement, Variable Annuities Supplement, and PBR Actuarial Reports. Review of the PBR Actuarial Reports required actuarial judgment. Although the analysis was intended to be based on a clear read of the reports, there is some risk of misinterpretation. Many reports had sections that were not completely clear to the reviewers, and in some cases, relevant information could not be easily found. The webinar slides summarize many, but not all observations and findings from the PBR Actuarial Reports.

V. Background

VAWG was formed to work with the NAIC Resources to support states in the review of PBR and uniformly address questions and issues arising from application of PBR. The term "NAIC Resources" refers to NAIC actuaries responsible for reviewing PBR Actuarial Reports and supporting states and the VAWG as requested.

The slides are a summary of the main findings from the VAWG's review of the 2024 VM-20 Reserves Supplement and Variable Annuities Supplement in the Annual Supplement Blanks, and the 2024 PBR Actuarial Reports. The review of the PBR Actuarial Reports covered life insurance and variable annuities. **The PBR Actuarial Reports are considered to be confidential information under Section 14A of the Standard Valuation Law (Model #820), and may only be disclosed by a commissioner pursuant to Section 14B of Model #820.**

The summary information does not contain any company-specific or other company-identifiable details. It includes findings to aid state insurance regulators in their PBR reviews, and provide companies with feedback intended to assist with the preparation of future PBR Actuarial Reports, VM-20 Reserves Supplements, and Variable Annuities Supplements.