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Original exposure of 13 considerations: March 16, 2022

## Tracking for the List of 13 MWG Considerations – PE Related and Other

1. Holding Company Structures:	7075 Full Undate				Fireface Date	Endate Date	Endate Date	Lindute Date		
	, W. / Fill 1988	20.2 30.07 10.20	AND THE PARTY OF THE PARTY	2024 String National Streeting Country	12/11/2023	712/2023	6152023	3/22/2023	3/22/2023	842022
Regulators may not be obtaining clear pictures of risk due to holding	Closed-term considered and address ed.	RFSWG Update: 04-04-25 Closed	RFSWG Update: 7-16-24	RFSWG Update: 7-29-24	GSIWG Update: B. Jenson 12-11-23 In November 2023, the GSIWG adorted regulator-only sound tractics		GSIWG Update: The GSIWG formed a drafting group to develop		GSIWG Update: The GSIWG plans to discuss this issue at its Dec. 14 meeting to determine next	Sent a referral for new work to the Group Solvency Issues (E) Working Group.
companies structuring contractual agreements in a manner to avoid regulatory disclosures and requirements. Additionally, affiliated telated		Assenses guarance see use in reviewing Change of Control (Form A) and Duclaimer of Affiliation flings for complex organizational structures and transactions was adopted into the 12/31/24 Financial Analysis, Handbook.	The Re SWC ness an open call on 71724 to discuss proposed guidance for use in reviewing investment advisory services provided by an affiliate, which was then exposed for a 45-day reable comment period	The RFSWG finalized updated guidance on regulator review and monitoring of affiliated services at the NAIC's 2023 Summer National	guidance for use in reviewing complex ownership structures of insurer		best practices for regulatory review in this area. The drafting group ha met multiple times and continues to work on the development of	1	steps in addressing the referral.	
party agreements impacting the insurer's risks may be structured to			ending Aug. 30.	Meeting. This guidance was subsequently adopted for inclusion in the	(see attached PDF). The Sound Practices document has been posted		written best practices. After the best practices are developed, the			
avoid disclosure (for example, by not including the insurer as a party to the assument)				2024 publications of the NAIC's Financial Analysis Handbook and Financial Condition Examiners Handbook. At that same meeting, the	to StateNet for regulator review and use.		drafting group will consider whether any should be proposed for inclusion in NAIC Handbooks or other action should be considered.			
				RESWG formed an Affiliated Investment Management Agreement	In addition, the CSIWG referred proposed additions to the NAIC's					
				drafting group to develop more specific guidance for use in reviewin	Financial Analysis Handbook to the Financial Analysis Solvency Tools (E) Working Group for further consideration in 2024. These odds	•				
				Group plans to present proposed handbook guidance to the RFSW	include additional Form A (Change of Control) review procedures, as					
				for neview at the NAIC's Spring 2024 National Meeting.	well as new guidance for use by regulators in evaluating Dischaimer of Courtol/Affiliation filings. See the attached Word docs for the referral					
					Control Affiliation filings. See the attached Word docs for the referral to FASTWG, as well as the proposed Handbook edits. These					
					documents will be exposed for public comment by FASTWG in 2024					
					and then adopted for inclusion in the 2025 FAH.					
					Finally, the Risk-Focused Surveillance (E) Working Group has formed					
					an Affiliated IMA Drafting Group to discuss the development of additional guidance related to regulator review of affiliated investment					
					management agreements and related services. The Drafting Group is					
					currently developing additional guidance for consideration in both the NAIC's Financial Analysis Handbook and the Financial Condition					
					Examiners Handbook that should be exposed in 2024 and then					
					adopted for inclusion in the 2025 editions.					
2. Ownership and Control:						<u> </u>				
Control is presumed to exist where ownership is >-10%, but control	Closed-term considered and addressed.	R25WG Update: 04-04-25 Closed	RESWG Update: 7-47-24  The RESWG held an open call on 313724 to discuss proposed guidance for use in reviewing investment advisory services provided by an afflinte, which was then exposed for a 45-day public comment period ending Aug. 30.	See update on #1 above that covers this topic as well.	See update above that covers this topic as well.		GSIWG Update: The GSIWG formed a drafting group to develop		GSIWG Update: The GSIWG plans to discuss this issue at its Dec. 14 meeting to determine next	Sent a referral for new work to the Group Solvency Issues (E) Working Group.
and conflict of interest considerations may exist with less than 10% convention. For example, a party may expecte a controlling inflamore		Additional guidance for use in reviewing Change of Control (Form A) and Disclaimer of Affiliation filings for complex commitational attactions and transactions was advanted into the 12/31/34 Financial Analysis Huntbook: Additional midures	The RFSWG held an open call on 7/17/24 to discuss proposed guidance for use in reviewing invoviment whiteney arrains provided by an affiliate which was then exposed for a 45-day rightly construct period.				bost tractions for regulatory review in this area. The drafting group has met multiple times and continues to work on the development of written best practices. After the best practices are developed, the	*	steps in addressing the referral.	
over an insurer through Board and management representation or		for use in reviewing and monitoring affiliated related-purty investment management services was adopted into both the	ending Aug. 30.				written best practices. After the best practices are developed, the			
contractual arrangements, including non-customary minority		12/31/24 Financial Analysis Handbook and the 12/31/24 Financial Condition Examiners Handbook.					drafting group will consider whether any should be proposed for inclusion in NAIC Handbooks or other action should be considered.			
(IMA) provisions such as onerous or costly IMA termination							action is view managed to their action name to consider.			
provisions, or encousive control or discretion given over the investmen										
to be distinguished from ownership when assessing and considering						I	1		i	1
Cismod is presented to exist when remarding is 7–10°F, but central and conflict of interest considerations may perior with low than 15°F was remardly. For examplic, a party may exactive a controlling influence over an interest threating bloom and an assument representation or controlled an analysis. It is also that the controlled an analysis is a controlled an analysis and a controlled an analysis and a controlled an analysis and a controlled and analysis and a controlled an analysis and a controlled and analysis and a controlled analysis and a controlled analysis and considering controlled and controlled analysis and considering controlled analysis and considering controlled analysis.						1	1		1	
1						1			1	
I bearing Manager Language (IML)						1			1	
<ol> <li>Investment Management Appearants (IMAs):</li> <li>The material terms of the IMA and whether they are arm's length or</li> </ol>	Closed-term considered and addressed.	RESWG Undate: 04-04-25 Closed	RESWG Undate: 7-16-24	RFSWG Undate: 7-29-24		<del>†</del>	RFSWG Undate: The RFSWG is nearing the convolution of its	İ	RFSWG Under: The RFSWG received and discussed this referral during its New 1 interior	Sent a referral to the Rink-Focused Surveillance (E) Working Gross to sold this
		Additional guidance for use in reviewing and monitoring affiliated related-party investment management services was adopted	The RFSWG held an open call on 7/17/24 to discuss proposed guidance for use in reviewing investment	The RFSWG formed an Affiliated Investment Management Agreeme		1	RFSWG Update: The RFSWG is nearing the completion of its project to update general guidance in NAIC handbooks related to		RFSWG Update: The RFSWG received and discussed this referral during in Nov. 1 interim- meeting. During the meeting, the RFSWG agreed to defer further work on this issue until its oragoing project to update general guidance in NAIC handbooks related to affiliated service agreements in	consideration to existing work involving affiliated agreements and Form D filings. Also sent a
involumnt management fees paid by the insurer, the termination provisions (how difficult or costly it would be for the insurer to terminate the DMA) and the degree of discretion or control of the		into both the 12/31/24 Financial Analysis Handbook and the 12/31/24 Financial Condition Examiners Handbook.	advisory services provided by an affliate, which was then exposed for a 45-day public comment period	drafting group to develop more specific guidance for use in reviewin investment advisory services provided by an affiliate. The Drafting		1	affiliated service agreements, which is expected to be completed by the 2023 Summer National Meeting. After the general guidance is completed, the Working Group plans to begin work on more trayed guidance related to affiliated involvment menagement agreements.	10	project to update general guidance in NAC handbooks related to affiliated service agreements is completed in early 2023.	referral to the Valuation of Securities (E) Task Force (VOSTF) to highlight the regulatory
provinces (see's difficult or costs) it would be for the insurer to terminate the IMA) and the degree of discretion or control of the			and of w	Group plans to present proposed handbook guidance to the RFSW		1	completed, the Working Group plans to begin work on more turneted		Completes in tany 2013.	discussion involving topics it administers.
involvent manager over involvent guidelines, allocation, and				for review at the NAUC's Spring 2024 National Meeting.		I	guidance related to affiliated investment management agreements.		VOSTF: discussed the referral and decided RFSWG was in the best position to address this	1
decisions.						1			concern.	
4. Owners of Insurers with Short-Term Focus and or Locallina						1			1	
4. Owners of Insurers with Short-Term Focus and/or Unwilling to Support a Troubled Insurer:						I	1		i	I
Owners of insurers, regardless of type and structure, may be focused on short-term results which may not be in alignment with the long-term	Closed-term considered and addressed.	RESWG and FASTWG Updates: 94-94-25 Closed	RFSWG Update: 7-16-24	RFSWG Update: 7-29-24		1	LATF Update 6/23: Actuarial Guideline 53 – Application of the Valuation Manual for Toring the Adequacy of Life Insurer Roserves	LATF Update: Asset adequacy analysis requirements in NAIC Model 8820 and	RFSWG Update: The RFSWG received and discussed this referral during its Nov. 1 interin	Sent a referral to the Risk-Focused Surveillance (E) Working Group to add this consideration to cristing work involving affiliated agreements and fees. Also sent a referral to the Life
on short-term results which may not be in alignment with the long-term nature of liabilities in life products. For example, investment		Additional guidance for use in reviewing surplus notes and capital maintenance agreements was adopted into the 12/31/24  Ninemial Analysis Montheads	The RFSWG hid an open call on 31724 to discuss proposed guidance for use in reviewing invorment advisory services provided by an affliate, which was then exposed for a 45-day public comment period.	The RFSWG formed an Affliated Investment Management Agreeme drafting group to develop guidance related to the reasonablemous of		1	Valuation Manual for Testing the Adequacy of Life Insurer Reserves (AG 53) became effective for year-end 2022. AG 53 requires addition	VM-30 require that company Appointed Actuaries perform tenting to ensure that	RPSWG Update: The RPSWG received and discussed this referral during its Nov. I interim meeting, During the meeting, the RPSWG agreed to defer further work on this tosse until its ongoing project to apidate general guidance in NAC handholox related to adjulated service	to existing work involving affiliated agreements and fices. Also sent a referral to the Life Actuarial (A) Task Force recognizing its existing work to ensure the long-term life liabilities
management fees, when not fair and reasonable, paid to an affiliate of			advisory services provided by an affiliate, which was then exposed for a 45-day public comment period ending Aug. 30.	investment management fees. Proposed guidance on this toric is		1	disclosures related to life insurance and annuity common investment	all the reserves held for the company's liabilities are adequate in light of the assets supporting the business. Regulators review associated company Statements of	angoing project to update general guidance in NAC handbooks related to affiliated service agreements is completed in early 2023.	Actuarial (A) Task Force recognizing its existing work to ensure the long-term life liabilities (reserves) and future fees to be paid out of the insurer are supported by appropriately
the owner of an insurer may effectively act as a form of unauthorized				expected to be discussed at the Spring 2024 National Meeting. In			disclosures related to life insurance and annuity company investment return assumptions for complex and high yielding assets. Regulators	Actuarial Opinion periodically .		modeled assets.
dividend in addition to reducing the insurer's overall investment returns. Similarly, owners of insurers may not be willing to transfer			In addition, the RFSWG referred issues related to surplus notes and capital maintenance agreements to the Financial Analysis Solvency Tools (E) Working Group.	addition, the RFSWG referred the considerations related to capital maintenance agreements over to the Financial Analysis Solvency Too			are conducting targeted reviews of the AG 53 disclosures to ensure			
capital to a troubled insurer.				Working Group.			that company investment returns for complex and high-yielding assets are not overly optimistic.			
			FASTWG Update: 7-16-24	LATF/VAWG Update: 12-1-23						
			PASTWG Update: 7-16-24  The FASTWG held an open call on 716-24 to discuss the development of additional guidance for regulator use in reviewing emplas notes and capital maintenance agreements. As a result of the call, the Working Grouped to form a durling group to a suart PAAC with the development of additional guidance in this area.	p. AG 53 reviews are in progress and focus on 4 areas related to this						
			agreed to form a drafting group to assist NAE with the development of additional guidance in this area.	p AG 53 reviews are in progress and focus on 4 areas related to this consideration of a potential coeffict of interest of 5T owners and an						
	LATE/VAWG Update: 10-14-25 Reviews of AG 53 reports for year-end 2024 are in progress. To ensure that reserve adequacy associated with long-	LATF/VAWG Update: 05-06-25	LATE/VAWG Findate: 7-22-24	The 4 series over						
	Reviews of AG 53 reports for year-end 2024 are in progress. To ensure that reserve adequacy associated with long-	Reviews of AG 53 reports for year-end 2024 are in progress. To ensure that reserve adequacy associated with	th Reviews of AG 53 reports for year-end 2023 are in progress. As an expansion to the 4 areas that were in	-high not yield assumptions						
	term liabilities is achieved, efforts will continue to focus on high net yield assumptions, attribution analysis of net yield	long-term liabilities is achieved, efforts will continue to focus on high net yield assumptions, attribution	focus last year (high net yield assumptions, attribution analysis of net yield assumptions, insestment expense	-attribution analysis of net yield assumptions						
		analysis of net yield assumptions, investment expense assumptions, reinsurance conectability projected	assumptions, and reinsurance collectability) to ensure reserve adequacy associated with long-term liabilities i achieved, more refined information is being reviewed. This includes information related to projected	- investment expense assumptions -reinsurance collectability						
i .	assets by tranche, payment in kind which may impact availability of future cash flows to support claims payments, and internally determined fair values.	long-term liabilities is achieved, efforts will continue to focus on high net yield assumptions, attribution analysis of net yield assumptions, investment expense assumptions, reinvarance collectability, projected of portfolio allocations, structured assets by tranche, payment in kind which may impact availability of future cash flows to support claims journments, and internally-determined fair values.	assumptions, and reinsurance collectability to ensure reserve adequacy associated with long-term liabilities in achieved, mere refined information is being reviewed. This includes information related to projected portfolio allocations, structured assets by tranche, and payment in kind which may impact availability of	a -lewestment expresse assumptions -reinsurance collectability						
I	assets by tranche, payment in kind which may impact availability of future cash flows to support claims payments, and internally-determined fair values.	anayls or her year sustription, elevation and consumptions, relationed consecutation, projected portfolio allocations, structured issists by transfer, payment is kind which may impact availability of future cash flows to support claims payments, and internally-determined fair values.	LATE/AWG Update: 7-22-34  Denotes of ACS Superior for your ord 2023 not in progress. As an expansion to the 4 mean the mean in Executed by College State Management, embedding analysis of not yell assemption, processor expensionally as a contract of the College State Management, and internates collectablely to accurate colleges; practical with long-term hiddless of profited sketchine, secondard search by mench, and populare in kind which may impact availability of faster cach flow to support claims programs.	involunce expense assumptions     minurance collectability						
	assets by tranche, payment in kind which may impact availability of future cash flows to support claims payments, and internally-determined fair values.	aways or ne yeo asungnon, investmen openie asungnon, renuzince concusately projecto o portiolo allocation, structured assets by trachs, payment in kind which may impact availability of future cash flows to support claims payments, and internally-determined fair values.	assurption, and minutance collectability to ensure moves adopuse; associated with lengthern Bolitect inclined, more relied alternation is being reviewed. This includes relevants in relied to projected collectability and projected alternation is being reviewed. This includes relevants in relied to projected perfolio adhesions, structured assets by tranche, and postered in hard which may impact availability of flatter cash flows to support claims posterate.	a -involvent expense assumptions -missaumce collectability						
	ussets by transhe, payment is kind which may impact availability of future cash flows to support claims payments, and internally-determined fair values.	which is the support statempore, recommended to support the support contracted, projects assurption of the support contracted assurption or periodic assurption of successive support of support contracted assure by support support contracted assured by support support contracted assured to support supp	assequits, and insurance collectably) to measure more adequate associated with long-term inhibitors portified absolute and extracted more in your mode, and populate in hird which may impact multility of future cash flow to support claims payments.	-in-othern expense assumptions -enuserance collectability						
5. Decrational. Governance and Market Conduct Practices:	externally-dottermined fair values.	portion affections, structured worth by treating, prepared in site of the treatment and indicated an	montpines, and instructers (collectively) to most merce alloward with lengthen thebbase school, new relief allowards in both proteod. The tackets instruction into the project school, the relief allowards in both proteod. The tackets instruction into the project school, and the school in the facer cash few to opport claim populate.	-in-order copiese assumptions -construct codestability						
Decretonal Governance and Market Cenduct Practice:     Operational powerance and market conduct practice to being impacted by the different proteins and keed of immance caperiones presented.	ments by search, payment in kind which may impact avoidability of future cash flows to support claims payments, and mentally determined for whice.  **The contract of the con	profit in the year accompanie, included and by tracking approach with order to be special and accompanies of the profit in discussion, included and by tracking approach before the him by pagest and ability of fidnes can find to support claim payment, and intensity determined for value.  NOVEL Typics: No two stricts his recount for the conductation or the suplement has focused on the international accordance.	sourgine, and manages a classification to man more adopty as sound will be passed abbles to profite declarate, meaning manages are profited access, meaning and profited access, meaning and profited access, meaning more payment as had which may impact another of faces cash from to oppose claim payment.  MEVIC Epider: No are attraction occurred for the coordinates or the registron bear formed on the missioners connections.	involuted expense assumptions reinsurance collectability  MWG Update: No new action has occurred for this consideration the registron base followed on the reinsurance consideration.			MWG Update: No new action has occurred for the consideration as the rapidates have focused on the reisources consideration.		WWC Epidare. No two actions has contented for this consideration as the regulators have found on the retrievance consideration.	The MNN will have developing some specific reggesters belain belay belancy the connections in the Ball-Proceed Seculation (E). Working Group.
by entrusts into the insurance market without rater insurance	externally-dottermined fair values.	perfect of the comment of the commen	sensifies and manages a chandrally to mean more adaptary assented with togetom deleter profits due does in contract and to by terms have been adapted as the proper condition of facts can five to expect these partners.  WHC Spakes You we which has occurred for the consideration in the registers been decount on the measure consideration.	*** Incurrence collectuality  ***The Control of the			NNG lydder: No new artisch bar occurred for the consideration in the ragidators have focused on the minuteness consideration.		MEG (place: No one makes his account for the consideration as the regulators have focused on the reconsecutor consideration.	The MNO will keep developing more specific ouggestion believe likely referring the interdistricts to the Back-board from these (f). Working Group.
by entrants into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the accusing firm's lack of expertise may not	externally-dottermined fair values.	and the statement according to the statement and the statement according to	whether the second seco	necession experies assumption  interactive collected by   ATHG Update: To true assum has occurred for the consideration,   for applican have focused in the retinerance consolutation.			NWG Update: No trea scienciae recorned for the consideration and the regulation have decorned on the substantine consideration.		MWE Epider No on wants for named for the standardists or the applicate law found on the consecutor consideration.	On MNU of king denluging near specific registrates below thely relating the consideration is the Eal-French Securities (2) Working Group.
by entrants into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the acquiring firm's lack of expertise may not be sufficient to administer the business. Such marcices could land to	externally-dottermined fair values.	profice discontinue, recurrent counts to process, prepare in tiris which may request establishing of fusions to fines in support claims progress, and internally determined for cubes.  **TOTAL Space***  **TOTAL Space***  **TOTAL Space***  **TOTAL Space***  **TOTAL Space***  **TOTAL Space**  **TO	surgetion of distinguist collected by the season them adjusted proceeded the frequent hills for profits the claims, surfaced and they breaked and proposed to list which may be proceeded by the later such from to expert claims promote.  When Epider: No new name has recounted for the constitution or the regulation have focused on the necessaries consideration.	necession capture incompliant includes a control of the consistency of			MWG lighter. No new action has occurred for this consideration on the applicate here decised on the intersence consideration or the entire state of the consideration.		MFG Lydne: No ever some has account for the consideration as the regulars have friend on the restrictions consideration.	The MNO williage developing more specific engagestees bedon Bally referring the consoliunces to the Rink's result formulates (I). Working Group.
by entrante into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the accepting flam's lack of expertise may not be sufficient to administer the business. Such practices could lead to layes, early surrender, audior exchanges of centencts with in-the-	externally-dottermined fair values.	profiles including, microred sourch tyrocolog, appears in the short may make availability of foliose and fines to support dates prepared, and internally defermed for value, the total paper dates prepared, and internally defermed for value, WMC lipides: No see allow he covered for the modification or for explicits from formed on the same remodiments.	The second secon	workness option analysis as well as a constant of the appetron have formed on the enterance consideration.			NWC typher to are assorted account for the assortation are replaced been focused on the attenuence consideration.		WFE Typine: Its toe gains his account for the simulations on the explains have found on the resolutions combination.	The MPU village declarating over quartic engagement below their stating the constitution to the Eal Facused Servidence (F). Working Group.
by entrants into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a sclance on TPAs due to the acquiring firm's lack of expertise may not be sufficient to administer the business. Such macrices could land to	externally-dottermined fair values.	refine income, recover acres to recover, present in time obtaining more mentality of fusion has to support claims prepared, and internally determined the value.  **NACL Spiker** have probable accounted for the constraints or fix applicant have focused in the recovered accounter of the constraints.	which we no other allowers is being to best. The solids of means and and the Specialist and a solid of Specialist and the solid of Specialist and Spe	western spine meripion whenever chandles we describe a chandle spine whenever chandles spine spi			WWG I plate. No are whin has recursed for the consideration at a applican have forward on the extrements consideration.		MVE Dytas: No ere some has exceed for the consideration as the regularies have froud on the return over consideration.	The MNO will keep developing more specific suggestions bedon Bally referring the consoliusmen to the Rich's research formulation (2). Working Group.
by entrante into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the accepting flam's lack of expertise may not be sufficient to administer the business. Such practices could lead to layes, early surrender, audior exchanges of centencts with in-the-	externally-dottermined fair values.	profiles including, microred search to recording, appears in the which may make availability of following the following the search of the sear	The control of the co	Assessment of the configuration and the configuration of the regulation has forward on the releasest consideration.			NWC Spike: No see a was be recorded for the consistence as the registers have found on the ninemess consolutation.		PPE typine: In one cases has accomply the constraints or the regulator has journal or all deviations or other regulators has journal or all deviations or constitutions.	The MWO William declaring near specific registerior below their delay interest the reconstruction in the Each Found Servidies (E) Working Group.
by entrants into the insurance market without prior insurance experience, including but not himside to, PE owners. For example, a relance on TPAs due to the acquaring firm's lack of experien may not be stifficient to administer the business. Such practices could lead to hapse, any surrender, and/or exchanges of contents twith in-the-	externally-dottermined fair values.	refine income, mounted south years, agreement into election specimens and account of the second south specimens and account of the second for south so	The contract of the contract o	Section of the control of the registers have been die to be reconsect a condition.			NWG Ighdae. No now also have control for the consideration on a registers have becomed us the nationaux a conditional.		MPC Epiter: No sees want has examined for the conditioning as the regulators have found or the retrievance conditionine.	The MNU Silking developing more specific reggestion below likely intering the sensitivation in the Field Factorial fear-values (I) Working Group.
by entrante into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the accepting flam's lack of expertise may not be sufficient to administer the business. Such practices could lead to layes, early surrender, audior exchanges of centencts with in-the-	externally-dottermined fair values.	perform incoming, microred sourch to recording, appears in the which may make availability of follow can have to appear down prepared, and internally determined for values.  **The Company of the prepared is a second for the consideration of the applican bear focused on the internal consideration.  **The Company of the control of the consideration or the applican bear focused on the internal consideration.	whether the description of the second of the	increases of place configure antonics of challenges  Office I pales. To use related to account for the constitution, the applican loss provided to the autonomic constitution.			NWC Epides. We are related accessed for the manufactures of the regulation have focused on the neutronnec constitution.		USE Epiden: To some action has accounted for this consideration on the equivalent how formed on the entirection contribution.	On MWI of long designing more question registrates below this relate the construction to the East Found Sorvillence (E) Working Group.
by entrants into the insurance market without prior insurance experience, including, but not limited to, PE owners. For example, a relance on TPAs due to the acquiring firm's hark of experien may not be sufficient to administer the business. Such practices could lead to have, early surrander, and/or exchanges of centents with in-the-	externally-dottermined fair values.	which is advanced, recovered assert to recover, present in time device may recover assertably of flavor can have to appropriate preparate, and internally determined for union.  NNC Tables Y was active to occurred the discontinuation of the applicant have forward or discontinua- tion.	The contract of the contract o	Sections of philosophysical accessors of a section of the registers have focused on the neutronic consideration.			NWG Epides No are nice be received for the consideration of the registers have found on the reterence consideration.		MMET plane: To one usion has account for the annahuman as the explains have found as the frequency consideration.	Fas WNO williamy developing more specific reggestion below fieldy intering the consoliuration to the Plate Fas and Novelderar (E) Westing Group.
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by common in the hormone method without poor insurance experience, which they be included LPF (rows recompt), at experience, which they be included LPF (rows recompt), at the sufficient is abstracted with the common the sufficient by a configuration of the conception of contract with in the recomposition and other important pulsely helder coverage and more than the contract of the contract pulsely helder coverage and configuration of their important pulsely helder coverage and more than the contract of the contract pulsely helder coverage and configuration of the configuration of the config	externally-dottermined fair values.	which is a discount auto to recover, present in the which may make availably of future on them to appropriate present, and internally defended for state.  INCLUDE: We will be trained for the modification or the application found or the neutrons are applications.  Constitutions.	The second secon	Secretary chains analysis and secretary chains are considered as a secretary chains and the constant for the considered as a secretary chains are specified by the secretary consideration.  **Chain delices associated and administration**			NWC Eppine: No use a bits his occusion for the simulations of the applican have formed on the subsenses excellentiate.		MPE Cypher: No see acins has accounted by this consideration on the explainer have found on the distribution consideration.	The MNO of long developing over quartic engagement below their others die executionistics to the Edd Yes used Sorvidore (E) Working Group.  The MNO contented to the Edd Yes used Sorvidore (E) Working Group.  The MNO contented of the sea set include to distinct to definition. Therefore, no before ward, with the condition of deliver conducted and or resident deal and no state.
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2. Asset Manager Affiliates and Disclaimers of Affiliation:	2025 Full Update	2025 Spring Update	2024 Summer National Meeting Update	2024 Spring National Meeting Update	Update Date	Update Date	Update Date	Update Date	Update Date	
Named a consideration unit and	Condition and indicated about	Count in a social and advanced	VARMO Indian Cloud	CARROL Delay Cland				EARWY Character Works	EARNY Complete Astronomy	MWC and the constitution of the constitution o
prouser considerations exist around asset manager affiliates (not just PE owners) and disclaimers of affiliation avoiding current affiliate	Carte tax consours and arrelad	t mue nas commune are allowed	No further work deemed necessary. Previous initiatives have addressed the PE concern, the referral objective	No further work deemed necessary. Previous initiatives have		SAPWG Completed Actions: See above descriptions Ref # 2021-21, Ref #2022-15 and Ref #2021-22 BWG; Ref #2022-	ĺ	S.4PHG Onguing Work: Ref #2022-15, which clarifies affiliated investment reporting, is planted for adoption	SAPWG Completed Actions: See above descriptions of Schedule Y Part 3. (Ref #2019-34 and Ref #2020-37BWG).	MWG regulators are constorable waiting to realize the benefits of the recently implemented Schodule Y, Part 3, along with the changes other NAIC committee groups will make for
investment disclosures. (A new Sc Y, Pt 3, has been adopted and will be in effect for year-end 2021. This schedule will identify all entities			and are complete.  The bond proposal and the reporting changes have been approved and will become effective January 1,	addressed the PE concern, the referral objective and are complete. The bond proposal and the reporting changes have been approved a	ad a	17, incorporated revisions to data-capture interest income disclosures, and established new disclosures for aggregate		consideration at the 2023 Spring National Meeting . It adds guidance on reporting o affiliated involvements.	1	several of the previously listed referrals, before determining if additional work is needed.  Also, a referral was sent to the Statutory Accounting Principles (E) Working Group
Pro-omersy and decisionates. (A new Se V, Pr. X, the boun adopted and will be in effect for year-and 2021. This schedule will kinetify all entities with greater than 10% ownership—negotifies of any discharact of affiliation - and whether there is a discharact of control discharact of affiliation is will also detailed by the therease controlling purey.			2025.	will become effective January 1, 2025.		paid-in-kind interest and deferred interest. (Adopted March		As part of a project known as the bond project, the SAPWG is developing a		Amounts, 1, rail, 2, assay was use common visual visus. Considerations groups we make to several of the proviously laisted reliefs, before determining if additional work is needed. Also, a referral was sent to the Statutory Accounting Principles (E) Working Group recognizing its existing work to revenue Schoduled D reporting along with the previously reministed code disclosures will assist with this consideration.
affiliation. It will also identify the ultimate controlling party.  Additionally, SAPWG is developing a proposal to revamp Schodule D.						2023). SAPWG Ongoing Work: Reporting changes to reflect the Schedule D-1 proposed changes were exposed by the		As part of a project known as the bond project, the SAPWG is developing proposal to revise Schalak D seporting, which intends to determine what is considered a qualifying bond and to identify different types of invortent not clarily. For example, the current bond proposal would divide Schedak D-1 it for season should be some read to displaces and a Schalach D-1 it for season-backet.		
reporting, with primary concepts to determine what reflects a qualifying bond and to identify different types of investments more clearly.						Blanks (E) Working Group on March 7, 2023, and updated travisions are anticipated for exposure shortly after the 2023		clearly. For example, the current bond proposal would divide Schadule D-1 into a Schedule D-1-1 for issuer credit obligations and a Schadule D-1-2 for asset-backet		
including assot-backed securities.)						revisions are anticipated for exposure shortly after the 2023 Summer National Meeting. The statutory accounting revisions to incorporate a new principles-based band	1		1	
						revisions to incorporate a new principles-based band		granshely on the actual types of investments held. The effective date of the bost proposal, and the reporting changes, is anticipated for January 1, 2023. Reporting changes to reflect the Schodule D-1 proposed changes were exposed by the Blank (E) Working Group on March 7, 2023. Updated revisions to the statutory accounting		
						definition in SSAP No. 26R—Bonds and SSAP No. 43R—Asset Backed Securities will be presented for adoption at the 2023 Summer National Meeting.		(E) Working Group on March 7, 2023. Updated revisions to the statutory accounting		
						Summer National Meeting.		guidance are planted for exposure by the Statutory Accounting Principles (E Working Group at the 2023 Spring National Meeting.	1	
								Bel #2073-17 which chelles interest income discharges is relevant for advention		
								<ul> <li>Ref #2022-17, which chriftes interest income disclosures, is planted for adoption consideration at the 2023 Spring National Meeting.</li> </ul>		
10. Privately Structured Securities:	BROTHPWY Lake 14 AS W	BROWN Later March	HISCHEWS 1-4-1- 8 2 24	DECEMBER COLLEGE AND A			RECORDER CAME TO SEA STANDARD CONTRACTOR	EXPTERMENT TO SAFETY OF A STATE OF THE STATE OF THE SAFETY	TITE Pade a second Coulder II (AC II) be been alread by the NAME County of	Version of the Life Annual (A) Tech Years according to a photo and a
affiliated and non-affiliated asset managers), which introduce other	The Risk-Based Capital Investment Risk and Evaluation (E) Working Group met September 8, 2025, to receive updates from the	RBCIREWG Update 04-07-25 The Risk-Based Capital Investment Risk and Evaluation (E) Working Group met Oct 22, 2024, Feb 11 and Mar 24, 2025, to	The Rick-Based Capital Involvment Rick and Evaluation (E) Weeking Group met June 21, May 22, and April	The Academy finalized their principles for structured occurities with			RBCIREWG Update: The Risk-Based Capital Investment Risk and Evaluation (E.) Working Group added this item to its working	VOSTF Update: The VOSTF sent referrals to the Financial Condition (E) Committee, Financial Stability (E) Task Foxce, Macroprudential (E) Working Group,	LATF Update: Actuarial Guideline 53 (AG 53) has been adopted by the NAVC's Executive (EX Committee and Plenary and sear. effective for year-end 2022 reporting. Starting in Spring 2025	Sent a referral to the Life Actuarial (A) Task Force recognizing its existing work on an Actuarial Guideline including disclosure requirements for the risks of privately structured
affiliated and non-effliated asset ransagers), which introduce other sources of risk or increase tendinate-fault risk, when complexity risk and fliquidity risk, and irrobo's a hick of transparency. (The NMC Capital Medical Beneau continues to menter this and issue regular superes, but much of the work is complex and time-intensive with a lot of remail reasonate required. The NMC Securities Valuation Office will begin receiving private rating rationals reports in 2022; these will offer seem temperature, into these protest receivable.	The Rid-Houles Capital Investment Risk and Evaluation (13 Working Group and Septishor 7, 2025, to receive spelans from the American Academy of Heuristic (Academy) in an extracted securities relatives and epithical Period (Period Richards) which are controlled as the Capital Richards of the Academy opposed to prepare need collaborated Lau Chilgiano (C.20)-Ci Indone modeling of an absolute the Working Service Security opposed to prepare the Richards to high produce the Academy's assignated project transless. Facility Office Working Service Security (Period Richards) and Service Security (Period Richards) and Service Service (Period Richards) and Service Service (Period Richards) and Servic	motive updates from the American Academy of Actuation (Academy) on its structured socurities risk-based capital (BBC) project. With the high of Academy, the Working Group is working to evaluate the appropriate RBC measured of Associated Socurities (ABS), including Collateralized Lanc Obligations (CLD), collateralized final obligations (CTOs), or other similar socurities carrying similar types of tallrisk, which is not addressed in reservoe (Working Aganda #RES).	12 to discuss residual trasechor and the 45% risk-based capital (RBC) factor in place for year-end 2024. After consideration of comments, as well as a review of alternative proposals to believe the residual tranches between 39% and 45% RBC categories, the Working Group adopted a monition to retain 445% RBC factor for all	indicated, this work may inform the work the Working Group door	•		estimation (L) is crossing circuly addressing privately structured agenda. While not specifically addressing privately structured securities, the Working Group's current seed on colleteralized loon obligations may contribute to addressing this item.	Evaluation (E) Working Group, Life Actuarial (A) Task Force, Financial Analysis (E)	regulators on the Valuation Analysis (E) Working Group will be conducting 4G 53 reviews. This will tember a targeted review of awar adequacy analysis related to modeling of business supported with projected high net yield assets.	Sent a referral to the VOSTF highlighting the MWG regulators' support for the blanks
reports, but much of the work is complex and time-intensive with a lot	priorities potential relationeris to key model assumptions. According to the Academy's attributed project transmit, that CLOs factors will be available for exposure by April 30, 2026. This timeline enables 2026 adoption in Life RBC framework. Future update from the	similar securities (Ants), techning Contaminate Loss Ortugations (CLU), contaminate that originates (CFOs), or other similar securities carrying similar types of tail risk, which is not addressed in reservor (Working Agenda #08.5).	novalual transfer for year-end 2024.	the sewer near to a star penning discussion by the group.			origination may contribute to analyzing min new.	Analysis (E) Working Geoup requesting featback on a proposal to have the NAK's	паррамы нав рецеста пар на уши аших.	Securities (E) Task Force (VOSTF). MWG negulators will wait on any further work or
begin receiving private rating rationale reports in 2022; these will offer	Actions is planted to suppose in incommer 2025 or early 2020.							and model measures of interest rate sensitivity and project investment cash flows and		the SAPWG Schodule D revamp project.
some transparency into these private securities.)								Committee, Financial Scholley (2). Tack Force, Maccoppelantial (2) Working Group, Capital Ackepany, (2) That Force, Each Induced Capital Incomment Real and Soylo, 16. Capital Acceptant, (2). That Force, Each Induced Capital Incomment Real and Soylo, 16. Working Group, States of Act, and the Real and Capital Incomment Capital Incomm		Actuard Gardinic including disclavers requirements for the risks of privately structured accurates and both the innear in modeling for the rispedients' respect for the helius. Start a selimit in the VOSTT Helpflaging is N WIG regisplator' respect for the helius. Scartinic (1): That Feer (VOSTT), MWIG regisplator leving create and by the Voluntius Scartinic (1): That Feer (VOSTT), MWIG regisplator leving create and by the Vost selimits and they have an opportunity to work with the results of the VOSTT proposal and the XMPG Schaled Devaups project. Scart a refined for case work to the ERC Invostment Risk and Exclasion (1): Working Gross and schools the ERC scenam not captured by sources.
	VOSTF Update: 18-18-25 Printidy wrentered secretice with material differences in assessment between Credit Rating Providers and the SVO would be captured in the decisions on Relating continued in the decisions on Relating continued in the decisions on Relating continued in the Relating Providers and the SVO would be captured in the decisions on Relating continued in the Relating Providers and the SVO would be captured in the decisions on Relating Continued Institute Continued Insti	VOSTF Update: 8449-25 Privately structured securities with material differences in association between Credit Rating Providers and the 5VO would be captured in the discussion on Relance on Rating Agencies in 11, below.	VOSTF Update: 7-17-24	VOSTF Update: 2-6-24				they envision being able to take advantage of such a capability within the NAK.		
	Privately structured securities with material differences in assessment between Credit Rating Providers and the SVO would be captured in the discussion on Relance on Rating Agencies in 11, below.	Privately structured securities with material differences in assessment between Credit Rating Providers and the SVO would be captured in the discussion on Relance on Rating Agencies in 11, below.	VOSTF Update: 7-17-24 Privately structured securities with material differences in assessment between Credit Rating Providers and the SVO would be captured in the discussion on Relance on Rating Agencies in 11, below.	In 2023 the Securities Valuation Office (SVO) proposed an amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the P&P Manual) to make all Structured						
	The proposal for the SVO to develop the analytic capability to collect and analytic risk metrics in currently on hold but could be revised under Finnesial Condition (f) Committee's Finnessook for Regulation of Insure Provincents — A Holetic Review.	The proposal for the SVO to develop the analytic capability to collect and analyse risk metrics is currently on hold but could	The received for the SVO to develop the analytic canability to collect and analyze risk matrics is currently on	Investment Analysis Office (the PEP Manual) to make all Structured Equity and Funds, which captures a subset of the privately structure						
	under Financial Condition (E) Committee's Framework for Regulation of Invasor Investments – A Holistic Review.	be revived under Financial Condition (E) Committee's Framework for Regulation of Insurer Investments - A Holistic	hold.	securities market, ineligible for filing exemption. The Task Force						
				draft a new proposal that was more limited in scope and which would	4					
				assessment differences. Privately structured securities with material						
				SVO would be captured in the discussion on Relance on Rating Answers in 11 below		1	ĺ	1		
				Description Division de la contraction de la con		1	ĺ	1		
				The proposal for the SVO to develop the analytic capability to collo and analyze risk metrics is currently on hold.		1	1	1		
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							L	1		
	Carea -ann consulate and anti-sed	Cased stars connected and allowed	No further work deemed necessary. Previous initiatives have addressed the PE concern and the referral	No further work deemed necessary. Provious initiatives have			SAPWG Ongoing Work:  • As discussed above, the Schedule D bond proposal is planned for 2025 reporting.	1		
			objective is complete.  The bond proposal and the reporting changes have been approved and will become effective January 1,	addressed the PE concern and the referral objective is complete. The bond proposal and the reporting changes have been approved a	ad	1	for 2025 reporting.	1		
			2025.	will become effective January 1, 2025.		1	1	1		
						1	1	1		
<ol> <li>Reliance on Earlier Arencing:</li> <li>The level of refunce on rating agency ratings and their appropriateness</li> </ol>	VOSTF Update: 16-16-25	VOSTF Update: 9449-25	VOSTF Update: 7-27-24	VOSTF Update: 2-6-24	VCSTF has drafted a list of questions to discuss with each rating	VOSTF received referral responses from the Financial		<u> </u>	VOSTF Update:	Sent a referral to the VOSTF indicating the MWG regulators' agreement to monitor the wo
for regulatory purposes (e.g., accuracy, consistency, comparability, applicability, interchangeability, and transparency). (VOSTF has	In August 2024, the Securities Valuation Office (SVO) adopted an amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the P.R.P. Manual) to authorize procedures for the SVO's and state regulator's discretism over NAIC	In August 2004, the Socurities Valuation Office (SVO) adopted an amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the P&P Manual) to authorize procedures for the SVO's and state regulator's	The Securities Valuation Office (SVD) has proposed an amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the PEP Manual) to authorize procedures for the SVO's	The Securities Valuation Office (SVO) has proposed an amendment to the Purposes and Procedures Manual of the NAIC Investment	agency in future regulator-only meetings. The SVO has received comments from certain rating agencies and is incorporating those	Condition (E) Committee, the Life Actuarial (A) Task Force, the Financial Analysis (E) Working Group and the Valuation				of its ad hoc group addressing various rating agency considerations.
previously addressed and will continue to address this issue.)	VOLT I Quant 18-0-2.  No Agout 2024, the Societies Valuation Office (SVO) adopted an amendment to the Purposes and Procedures Manual of the NAU- incontent Analysis Office (the PAP Manual) to antienter procedures for the SVO: and attem regulator's discretion over NAU- Comparison assigned through the Tage Exception (PS) process. The analysis argues and SVO and and east angitheness seems look of discretion over the FE process as address the NAU-Co-content that relative out of restings. It also address to the Tage cold of discretion over the FE process as address the NAU-Co-content that relative on cutte ratings. It also address to the Tage cold.	an August acceptation of the August Office (the PEP Measur) to atherize procedure for the SVOV and state regulator's descrition over NAC Designations assigned through the Piling Exemption (PE) process. The attendance greats the SVO outflind state regulators some loved of descrition over the Expresses to address the NAC's current blind relance on credit entings. It also addresses the Pinaccial Condition (E) Committee's charge to the Task Force to:	discretion over NAIC Designations assigned through the Filing Exemption (FE) process. The amendment acuted grant the SVO staff some level of discretion over the FE process to address the NAICH current bland relisions on credit ratings. It is the addresses the Financial Condition (E) Committed's charge to the Task	Analysis Office (the PSP Manual) to authorize procedures for the SVO's discretion over NAIC Designations assigned through the Elec-	comments into a final list of questions to be agreed to by the Task Fonce. At the 2023 Spring National, during the discussion of the	CRST resource and more resources have her forecast configuration of the	1	1		
	Condition (E) Committee's charge to the Task Force to:	ratings. It also addresses the Financial Condition (E) Committee's charge to the Task Force to:	relance on credit ratings. It also addresses the Financial Condition (E) Committee's charge to the Task	Exemption (FE) process. The amendment would grant the SVO sta	proposed amendment on Structured Equity and Funds, the Task	and provided examples of risk metrics which would be useful to their groups. The Financial Analysis Working Group supported			• The Task Trans adopted an omnohiment at \$1 \cdot 3.7 meaning that offsite is in \$1, 2005, transit in the contract of the	
	Establish criteria to parmit stuff's discretion over the assignment of NAC designations for securities subject to the FE poscess (the use of CRP prings to determine an NAC designation) to causer greater consistency, staffernity, and appropriateness to achieve the NAC's	Exhibited criteria to permit staff's discretion over the assignment of NAIC dosignations for occarities subject to the FE process (the use of CRP relings to determine as NAIC designation) to ossure greater consistency, suffermity, and appropriations to a adhere the NAIC francial solvency objectives.	relative on credit safetys. It shis addresses the Prosocial Condition (E) Committee's funge to the Tests The Test of the Committee's Committee of the Committee's Committee's Committee's Committee's Committee of Committee's Committee on C	current blind reliance on credit ratings. It also addresses the Finan-	amendment and directed the SVO stoff to draft a distinct process on	the VOSTF investigating various products because it said the			financially moduled collateralized loan obligations (CLO) will not be eligible to use credit rating	
	or CRP range to determine an NAR. designation) to cause greater consistency, tentoring, and appropriations to action the NAR. ( financial solvency objectives.	appropriateness to achieve the NAIC's financial solvency objectives.	subject to the FE process (the use of CRP ratings to determine an NA/C designation) to ensure greater consistency, uniformity, and appropriateness to achieve the NA/C's financial solvency objectives. The	Condition (E) Committee's charge to the Task Force to: Establish criteria to permit staff's discretion over the assignment o	how it would recommend challenging an NAIC Designation assigned from a credit rating provider ("CRP") rating pursuant to the Filing	analysts and examiners to fully evaluate and assess investmen			The Task Force has drafted a first of questions to discuss with each rating agency in future	
	The discretion process includes:	appropriates to achieve the NAUC. Natural solvery objective.  The preparal is unable to employee the Francisco Contains (2) Constitute 1, Francisco for Regulation of Instant Instants — A Holist Excess. Among who instants, the Holist Francisco data for the applications of a Couling Product (COS) and digines the second would be NAUC. In these coast societies are forming agrees for exceptance in NAUC COS. The NAUC is wart to signify an empayment form with a third-purely consolated to help design and implicate this facility of the Cost of the C	proposal is intended to complement E-Committee's Framework for Regulation of Insurer Investments – A. Hishitic Review.	NAIC designations for securities subject to the FE process (the use CRP ratings to determine an NAIC designation) to ensure greater	of Exemption ("FE") process which the SVO thinks is not a reasonable assessment of risk for regulatory purposes. The SVO subsequently	worthwhile for the VOSTF to continue to investigate the various			Role being systematic and the questions are in the materials for the Spring National Meeting and to Mode being systematic for rather comments.	
	<ul> <li>A materially tributed required to tag at KP strag, in order to min the SVO's use of this process to only what would be considered truly material differences of opinion, the SVO and state regulators would only be able to change an NAIC Designation assigned through</li> </ul>	Rating Provider (CRP) due d'Agence framework to enable the NAIC to better assess and evaluate credit rating agencies for		consistency, uniformity, and appropriateness to achieve the NAIC' financial solvency objectives.	proposed on amendment which would gront the SVO staff a limited amount of discretion over the FE process to address the NAIC's	state regulators that provide some of the alternative investment			Equity and Funds transactions from being eligible to use credit rating provider (CRP) ratings to	
	the FE process if they determine it is 3 or more notches different than the SVO's assessment.  • Final decisions will be made by a subgroup of the Task Force in the review process before any rating would be removed from the FE.	acceptance as NAIC CRPs. The NAIC is near to signing an engagement letter with a third-party consultant to help design and implement this framework.	this process to only what would be considered truly material differences of opinion, the SVO would only	The proposed process would include:	current blind reliance on credit ratings. The amendment would	risk measures as they could obviste the need for the NAIC to collect that information form NAIC Annual Statements.			assign an NAIC Designation. The SVO has proposed defining Structured Equity and Funds investments as investments which, through the insertion of an intervening entity such as a special	
	The Ground process indused.  The Ground process in the Control of the Control of the process in only data would be contained probability and process of the Control of the	The second second includes:	This process to only what would be considered truly material differences of opinion, the SVO would only be able to charge a Designation assigned through the EF process if it were I or more notiched different than the SVO sessiones. On the EF process if it were I or more notiched different than the SVO sessiones. On the EF process if it were I or more notiched different than the SVO sessiones. On the EF process if it were I or more notiched different and the SVO sessiones. On the EF process is the session of the Tank Force in the review present before any rating would be removed.	rating. In order to limit the SVO's use of this process to only what	ride a CRP rating including a materiality threshold of a 3-notch	However, the E Committee said that before it could sponsor the proposal it would need more information to fully understand			purpose vehicle (SPV) or limited partnership, enable underlying assets that may not qualify as "bonds" or be digible to receive an NAIC Designation under the current regulatory guidance, to be	
	<ul> <li>Procedural steps were implemented to ensure insurers are given due process: ample notification to insurer, an opportunity for the insurer to provide full documentation to the SVO and explain its analysis of the investment, an opportunity to get an alternate CRP</li> </ul>	- A materially throubold required to flag a CRP rating. In order to limit the SVO's use of this process to only what would be considered truly material differences of opinion, the SVO and state regulators would only be able to change as NAIC.	*Bhal decisions would be made by a subgroup of the Task Force in the review present before any rating would be removed.	would be considered truly material differences of opinion, the SVD would only be able to change a Designation assigned through the F	difference in order to flag a CRP rating and sufficient notice to insurers to provide time for insurers to appeal SVO assessments. This	the costs and benefits of such products. This is an ongoing initiative.			reported as 'bonds' because the intervening entity issues notes and those notes receive a credit rating provider rating. The SVO identified multiple regulatory reporting arbitrage opportunities with	
	rating, and sufficient time to file the security, if needed.	crosidented tridy material differences of opinion, the SVO and state regulators would only be able to change an NAX: Designation assigned through the EF process if they determine it is 3 or more metches different than the SVO's associated. Final decisions that be readed by a relaying of the Task Foreign the relaying to the Casis Foreign the transfer process before any relate possible from the FEP process. The procedures permit participation by the destricitiesy supervisor, impacted insurers and other participation by the destricitiesy supervisor, impacted insurers and other participation in the supervisor of the supervisor of the supervisor.	acould be removed.  Aftercodural steps to ensure insurers are given due process; ample nodification to insurer, an opportunity for the insurer to proude full discoursentation to the SVD and explain its analysis of the investment, an opportunity to get an alternate CRP landing, and sufficient there to fall the security, it medidd.  VOST is currently reviewing comments from interested parties and discussion is ongoing.	process if it were 3 or more notches different than the SVO's assessment.	amendment will continue to be discussed by the Task Force and interested parties.				those investments that circumvent regulatory guidance using a CRP rating to accomplish that result	
	While authority for such challenges has been granted, the infrastructure for implementation is still in development.	from the FE process. The procedures permit participation by the domiciliary supervisor, impacted insurers and other parties	opportunity to get an alternate CRP rating, and sufficient time to file the security, if needed.	affectivation of a substrain of the Task Entre in the review process						
				before any rating sare of he removed					The Task Force adopted a new charge for 2023 to stablish criteria to normal staff's discretion	
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