

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

CONTACT PERSON: <u>Pat Allison</u> TELEPHONE: <u>816-783-8528</u> EMAIL ADDRESS: <u>pallison@naic.org</u> ON BEHALF OF: <u>LATF</u> NAME: <u>Mike Boerner, Chair</u> TITLE: _____ AFFILIATION: _____ ADDRESS: _____ _____ _____	DATE: <u>02/21/2020</u>	FOR NAIC USE ONLY
	Agenda Item # <u>2020-11BWG</u> Year <u>2020</u> Changes to Existing Reporting [X] New Reporting Requirement []	REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT
	No Impact [X] Modifies Required Disclosure []	DISPOSITION
	[] Rejected For Public Comment [] Referred To Another NAIC Group [] Received For Public Comment [X] Adopted Date <u>05/28/2020</u> [] Rejected Date _____ [] Deferred Date _____ [] Other (Specify) _____	

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|---|---|--------------------------------------|
| <input checked="" type="checkbox"/> ANNUAL STATEMENT | <input checked="" type="checkbox"/> INSTRUCTIONS | <input type="checkbox"/> CROSSCHECKS |
| <input type="checkbox"/> QUARTERLY STATEMENT | <input type="checkbox"/> BLANK | |
| <input checked="" type="checkbox"/> Life, Accident & Health/Fraternal | <input type="checkbox"/> Separate Accounts | <input type="checkbox"/> Title |
| <input type="checkbox"/> Property/Casualty | <input type="checkbox"/> Protected Cell | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Health | <input type="checkbox"/> Health (Life Supplement) | |

Anticipated Effective Date: Annual 2020

IDENTIFICATION OF ITEM(S) TO CHANGE

See next page for details of changes to the VM-20 Reserves Supplement.

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

Changing the reporting units for reserves to attain consistency with other annual statement blanks. Clarifying the instructions to attain consistency in company reporting. Changes are based on findings from the 2018 review of company filings.

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed on all forms.

IDENTIFICATION OF ITEM(S) TO CHANGE

VM-20 Reserves Supplement Blank:

- Splitting Part 1 into Part 1A and Part 1B.
- For Part 1A:
 - Changing the description header for Column 3 to be “Due and Deferred Premium Asset” so that it matches the instructions.
 - Adding “XXX” in two places to the indicate that a Due and Deferred Premium Asset does not need to be reported in the lines shown for Total Reserves.
 - Changing the reporting units for all columns to be in dollars rather than in thousands.
 - Expanding all columns to allow room for a number as large as 999,999,999,999.
 - Changing the product labels for clarity.
- For Part 1B:
 - Changing the reporting units for the Reserve columns to be in dollars rather than in thousands.
 - Expanding the Reserve columns to allow room for a number as large as 999,999,999,999.
 - Expanding the Face Amount columns to allow room for a number as large as 9,999,999,999.
 - Changing the product labels for clarity.
- Removing Part 2 and re-numbering the remaining Parts.

VM-20 Reserves Supplement Instructions:

- Adjusting the instructions according to the changes made to the blanks.
- Clarifying instructions and adding examples for Parts 1A and 1B.

ANNUAL STATEMENT INSTRUCTIONS – LIFE/FRATERNAL

VM-20 RESERVES SUPPLEMENT—PART 4

Life Insurance Reserves Valued According to VM-20 by Product Type

~~(\$000 Omitted Except for Number of Policies)~~

This Supplement provides information on the reserves required to be calculated by Section VM-20 of the *Valuation Manual*. This includes the Net Premium Reserve and, as applicable, the Deterministic Reserve and the Stochastic Reserve. ~~This Supplement also provides information regarding business where VM-20 of the *Valuation Manual* is not required to be applied. Only business issued on or after Jan. 1, 2017, valued by the requirements of VM-20 should be reported in Part 1A and Part 1B. Part 1A and Part 1B are intended to aid regulators in the analysis of reserves as determined under Section VM-20 of the *Valuation Manual* for both the prior and current year. Companies that elect the three-year transition for some of their policies should not report those policies in this part.~~

~~This Supplement also provides information regarding business where VM-20 of the *Valuation Manual* is not required to be applied. Companies that elect the three-year transition period for all of their business or are otherwise exempted from the requirements of Section VM-20 are not required to complete Part 1A or Part 1B of this Supplement pursuant to the instructions in Part 2 of this Supplement, but must complete Part 2 or Part 3 as applicable.~~

VM-20 RESERVES SUPPLEMENT – PART 1A

Life Insurance Reserves Valued According to VM-20 by Product Type

Part 1A of this Supplement breaks out, by product type, the prior year and current year reported reserves on a Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded basis as defined in Section 8.D of Section VM-20 of the *Valuation Manual*. ~~The Due and Deferred Premium Asset for the current year is also shown. In addition, Part 1 of this Supplement shows, by product type for the current year, the Due and Deferred Premium Asset, the Net Premium Reserve (NPR), the Deterministic Reserve (DR) and the Stochastic Reserve (SR), where the NPR, DR and SR are as defined in Section VM-20 of the *Valuation Manual*. This Supplement is intended to aid regulators in the analysis of reserves as determined under Section VM-20 of the *Valuation Manual* for both the prior and current year.~~

Section VM-20 of the *Valuation Manual* requires that the Post-Reinsurance-Ceded Reserve be determined by three ~~product groups~~ VM-20 Reserving Categories: Term Insurance, Universal Life with Secondary Guarantees (ULSG) and all other. Term Insurance should be reported on line 1.1. ULSG, including Variable Universal Life with a secondary guarantee, Indexed life insurance with a secondary guarantee, regular Universal Life with a secondary guarantee, and ULSG policies with a non-material secondary guarantee as defined in Section VM-01 of the *Valuation Manual*, should be reported on line 1.2. Each of the other products reported in lines 1.3 – 1.8 should be determined as the sum of the policy reserves using the policy reserves determined following the allocation process of VM-20 Section 2. A similar process should be used for each of the pre-reinsurance-ceded reserves.

~~**Section A: Columns 4 through 8** are to be completed if each of the reserves in Columns 4 through 6 (NPR, DR, SR) is calculated according to the requirements of Section VM-20 of the *Valuation Manual*.~~

~~**Section B: Columns 9 through 12** are to be completed only if the reserves in Columns 9 and 10 (NPR, DR) are calculated according to the requirements of Section VM-20 of the *Valuation Manual*.~~

~~**Section C: Columns 13 through 15** are to be completed only if the reserve in Column 13 (NPR) is calculated according to the requirements of Section VM-20 of the *Valuation Manual*.~~

Columns 1 & 2 – Reported Reserve

Provide the reported reserve, in ~~thousands~~ whole dollars, for the prior year and current year for each line item. Post-Reinsurance-Ceded is net of reinsurance ceded, and, Pre-Reinsurance-Ceded ~~includes reinsurance assumed and excludes any reinsurance ceded~~ should be prior to any reinsurance ceded and include reinsurance assumed. Sections 2 and 8 in the *Valuation Manual* further describe the required reserve and treatment of reinsurance. The reported reserve for the current year should reflect all policies in force as of the end of the current year. The reported reserve for the prior year should reflect all policies in force as of the end of the prior year.

Column 3 – Due and Deferred Premium Asset

Provide the due and deferred premium asset amount, in ~~thousands~~ whole dollars, associated with the current year Reported Reserve from Column 2 and calculated in a manner consistent with lines 15.1 and 15.2 of the Annual Statement Assets page.

Example 1:

A company reinsures a ULSG product using YRT reinsurance.

- The ceding company reports their reserve on lines 1.2 and 3.2 for ULSG.
- The assuming company reports their reserve on lines 1.1 and 3.1 for Term.

Example 2:

A company reinsures a Term product using YRT reinsurance.

- The ceding company reports their reserve on lines 1.1 and 3.1 for Term.
- The assuming company reports their reserve on lines 1.1 and 3.1 for Term.

VM-20 RESERVES SUPPLEMENT – PART 1B

Life Insurance Reserves Valued According to VM-20 by Product Type

(\$000 Omitted for Face Amount)

Part 1B of this Supplement provides details underlying the amounts shown in Part 1A.

Section A: Columns 4-1 through 8-5 are to be completed if each of the reserves in Columns 4-1 through 6-3 (NPR, DR, SR) is calculated according to the requirements of Section VM-20 of the *Valuation Manual*.

Section B: Columns 9-6 through 12-9 are to be completed only if the reserves in Columns 9-6 and 10-7 (NPR, DR) are calculated according to the requirements of Section VM-20 of the *Valuation Manual*.

Section C: Columns 13-10 through 15-12 are to be completed only if the reserve in Column 13-10 (NPR) is calculated according to the requirements of Section VM-20 of the *Valuation Manual*.

Column ~~4~~1, ~~9~~6 & ~~13~~10 – Net Premium Reserve (NPR)

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Net Premium Reserve for ~~the~~ each product type, in whole dollars. The Net Premium Reserve is defined in Section 3 in VM-20 of the *Valuation Manual*.

Column ~~5~~2 & ~~10~~7 – Deterministic Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Deterministic Reserve for each product type, in ~~thousands~~whole dollars. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Deterministic Reserve calculation is defined in Section 4 in VM-20 of the *Valuation Manual*.

Column ~~6~~3 – Stochastic Reserve

Report the Post-Reinsurance-Ceded and Pre-Reinsurance-Ceded Stochastic Reserve for each product type, in ~~thousands~~whole dollars. Report the amount whether it is positive or negative; do not floor the amount at zero if it is negative. The Stochastic Reserve calculation is defined in Section 5 in VM-20 of the *Valuation Manual*.

Column ~~7~~4, ~~11~~8 & ~~14~~11 – Number of Policies

Report the number of individual life insurance policies by product type and by the required VM-20 methodology used as described in Section A, Section B and Section C above. The number of policies should be prior to any reinsurance ceded and include reinsurance assumed.

Column ~~8~~5, ~~12~~9 & ~~15~~12 – Face Amount

Report the face amount, in thousands, of individual life insurance by product type and by the required VM-20 methodology used as described in Section A, Section B and Section C above. The face amount should be prior to any reinsurance ceded and include reinsurance assumed.

Example:

A company has Term business subject to VM-20, and there is no reinsurance. The Stochastic Exclusion Test was passed. The Deterministic Reserve at year-end was negative.

- The company completes Section B.
- The Net Premium Reserve is reported in whole dollars in Column 6.
- The negative Deterministic Reserve is reported in whole dollars in Column 7.
- The Number of Policies is reported in Column 8.
- The Face Amount is reported in thousands in Column 9.

VM 20 RESERVES SUPPLEMENT – PART 2

Three Year Transition Period

(\$000 Omitted Except for Number of Policies)

This section of the Supplement should be completed when a reporting entity has elected to apply the three year transition provided in Section II, Sub-section C under Life Insurance Products of the *Valuation Manual* to some or all of its business.

This Part 2 should include the values requested for the business for which the three year transition has been elected and should not include values for any policies valued based on VM 20. This Part 2 allows the company to establish minimum reserves according to applicable requirements stated in Appendix A (VM-A) and Appendix C (VM-C), in the *Valuation Manual*, for business otherwise subject to VM 20 requirements and issued during the first three years following the Operative Date of the *Valuation Manual*. If a company does not elect this three year transition, but elects to apply VM 20 to a block of business issued on and after the Operative Date, then such company must continue to apply the requirements of VM 20 to this block of business, as well as future new issues of this type of business.

A company that elects to apply the three-year transition for all of its products within the scope of VM 20 does not have to complete Part 1 of the VM 20 Supplement. If a company applies VM 20 to a product or products, then Part 1 of this VM 20 Supplement will need to be completed.

VM-20 RESERVES SUPPLEMENT – PART 3-2

Life PBR Exemption

This section of the Supplement should be completed by a company that has filed and been granted a Life PBR Exemption from its state of domicile.

If a company has been granted a Life PBR Exemption, the company must indicate the source of the Life PBR Exemption, which could be defined in a state statute, a state regulation or in the NAIC-adopted *Valuation Manual*. If the source of the granted Life PBR Exemption is not the NAIC-adopted *Valuation Manual*, the company must disclose the criteria of the state's Life PBR Exemption that the company has met, and the company must disclose the minimum reserve requirements that are required by the state of domicile. If the minimum reserve requirements of the state of domicile are the same as those specified in the NAIC-adopted *Valuation Manual*, the company may indicate: "Same as NAIC VM".

Companies whose individual ordinary life business is exempted from the requirements of VM-20 pursuant to a Life PBR Exemption are not required to complete Part 1 of this VM-20 Supplement.

VM-20 RESERVES SUPPLEMENT – PART 4-3

Other Exclusions from Life PBR

Questions 1 and 2 of this section of the Supplement should be completed by a company that has filed and been granted a Single State Exemption from the reserve requirements of VM-20 by its state of domicile pursuant to requirements similar to the optional Section 15 of the NAIC *Standard Valuation Law* (# 820). The response to question 2 should be "Yes" if the company has any business assumed that relates to issues outside the state of domicile.

Question 3 of this section of the Supplement should be completed by a company if all its life business is excluded from the requirements of VM-20 pursuant to Section II.B of the *Valuation Manual*.

Companies responding "Yes" to question 1 are not required to complete Part 1 of this VM-20 Supplement if all of their individual ordinary life business was covered under the Single State Exemption. Companies responding "YES" to question 3 are not required to complete Part 1 of this VM-20 Supplement.

ANNUAL STATEMENT BLANK – LIFE/FRATERNAL

VM-20 RESERVES SUPPLEMENT – PART 1A
 Life Insurance Reserves Valued According to VM-20 by Product Type
 For The Year Ended December 31, 20__
 (To Be Filed by March 1)
 (\$000 Omitted Except for Number of Policies)

NAIC Group Code _____

NAIC Company Code _____

	Prior Year	Current Year																
	1 Reported Reserve	2 Reported Reserve	3 Deferred Premium Asset	SECTION A					SECTION B				SECTION C					
				4 Net Premium Reserve	5 Deterministic Reserve	6 Stochastic Reserve	7 Number of Policies	8 Face Amount	9 Net Premium Reserve	10 Deterministic Reserve	11 Number of Policies	12 Face Amount	13 Net Premium Reserve	14 Number of Policies	15 Face Amount			
1. Post Reinsurance Ceded Reserve																		
1.1. Term Life Insurance							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.2. Universal Life With Secondary Guarantee							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.3. Non-Participating Whole Life							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.4. Participating Whole Life							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.5. Universal Life Without Secondary Guarantee							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.6. Variable Universal Life							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.7. Variable Life							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.8. Indexed Life							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
1.9. Aggregate Write Ins for Other Products							XXX	XXX				XXX	XXX	XXX	XXX	XXX	XXX	XXX
2. Total Post Reinsurance Ceded Reserve (Sum of Lines 1.1 through 1.9)				XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
3. Pre Reinsurance Ceded Reserve																		
3.1. Term Life Insurance														XXX				
3.2. Universal Life With Secondary Guarantee																		
3.3. Non-Participating Whole Life																		
3.4. Participating Whole Life																		
3.5. Universal Life Without Secondary Guarantee																		
3.6. Variable Universal Life																		
3.7. Variable Life																		
3.8. Indexed Life																		
3.9. Aggregate Write Ins for Other Products																		
4. Total Pre Reinsurance Ceded Reserve (Sum of Lines 3.1 through 3.9)				XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
5. Total Reserves Ceded (Line 4 minus Line 2)			XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
DETAILS OF WRITE INS																		
1.901							XXX	XXX				XXX	XXX			XXX	XXX	XXX
1.902							XXX	XXX				XXX	XXX			XXX	XXX	XXX
1.903							XXX	XXX				XXX	XXX			XXX	XXX	XXX
1.998. Summary of remaining write ins for Line 1.9 from overflow page							XXX	XXX				XXX	XXX			XXX	XXX	XXX
1.999 Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above)							XXX	XXX				XXX	XXX			XXX	XXX	XXX
3.901																		
3.902																		
3.903																		
3.998. Summary of remaining write ins for Line 3.9 from overflow page																		
3.999 Totals (Lines 3.901 through 3.903 plus 3.998) (Line 3.9 above)																		

	Prior Year	Current Year	
	<u>1</u> <u>Reported Reserve</u>	<u>2</u> <u>Reported Reserve</u>	<u>3</u> <u>Due and Deferred Premium Asset</u>
1. Post-Reinsurance-Ceded Reserve			
1.1. Term Life Insurance.....
1.2. Universal Life With Secondary Guarantee.....
1.3. Non-Participating Whole Life.....
1.4. Participating Whole Life.....
1.5. Universal Life Without Secondary Guarantee.....
1.6. Variable Universal Life Without Secondary Guarantee.....
1.7. Variable Life Without Secondary Guarantee.....
1.8. Indexed Life Without Secondary Guarantee.....
1.9. Aggregate Write-Ins for Other Products
2. Total Post-Reinsurance-Ceded Reserve (Sum of Lines 1.1 through 1.9)			XXX
3. Pre-Reinsurance-Ceded Reserve			
3.1. Term Life Insurance.....
3.2. Universal Life With Secondary Guarantee.....
3.3. Non-Participating Whole Life.....
3.4. Participating Whole Life.....
3.5. Universal Life Without Secondary Guarantee.....
3.6. Variable Universal Life Without Secondary Guarantee.....
3.7. Variable Life Without Secondary Guarantee.....
3.8. Indexed Life Without Secondary Guarantee.....
3.9. Aggregate Write-Ins for Other Products
4. Total Pre-Reinsurance-Ceded Reserve (Sum of Lines 3.1 through 3.9)			XXX
5. Total Reserves Ceded (Line 4 minus Line 2)			XXX
<u>DETAILS OF WRITE-INS</u>			
1.901.
1.902.
1.903.
1.998. Summary of remaining write-ins for Line 1.9 from overflow page.....
1.999 Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above)
3.901.
3.902.
3.903.
3.998. Summary of remaining write-ins for Line 3.9 from overflow page.....
3.999 Totals (Lines 3.901 through 3.903 plus 3.998) (Line 3.9 above)

VM-20 RESERVES SUPPLEMENT – PART 1B
Life Insurance Reserves Valued According to VM-20 by Product Type
For The Year Ended December 31, 20____
(To Be Filed by March 1)
(\$000 Omitted for Face Amount)

	Current Year											
	SECTION A					SECTION B				SECTION C		
	1 Net Premium Reserve	2 Deterministic Reserve	3 Stochastic Reserve	4 Number of Policies	5 Face Amount	6 Net Premium Reserve	7 Deterministic Reserve	8 Number of Policies	9 Face Amount	10 Net Premium Reserve	11 Number of Policies	12 Face Amount
1. Post-Reinsurance-Ceded Reserve												
1.1. Term Life Insurance				XXX	XXX			XXX	XXX	XXX	XXX	XXX
1.2. Universal Life With Secondary Guarantee				XXX	XXX			XXX	XXX		XXX	XXX
1.3. Non-Participating Whole Life				XXX	XXX			XXX	XXX		XXX	XXX
1.4. Participating Whole Life				XXX	XXX			XXX	XXX		XXX	XXX
1.5. Universal Life Without Secondary Guarantee				XXX	XXX			XXX	XXX		XXX	XXX
1.6. Variable Universal Life Without Secondary Guarantee				XXX	XXX			XXX	XXX		XXX	XXX
1.7. Variable Life Without Secondary Guarantee				XXX	XXX			XXX	XXX		XXX	XXX
1.8. Indexed Life Without Secondary Guarantee				XXX	XXX			XXX	XXX		XXX	XXX
1.9. Aggregate Write-Ins for Other Products				XXX	XXX			XXX	XXX		XXX	XXX
2. Total Post-Reinsurance-Ceded Reserve (Sum of Lines 1.1 through 1.9)	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
3. Pre-Reinsurance-Ceded Reserve										XXX		
3.1. Term Life Insurance												
3.2. Universal Life With Secondary Guarantee												
3.3. Non-Participating Whole Life												
3.4. Participating Whole Life												
3.5. Universal Life Without Secondary Guarantee												
3.6. Variable Universal Life Without Secondary Guarantee												
3.7. Variable Life Without Secondary Guarantee												
3.8. Indexed Life Without Secondary Guarantee												
3.9. Aggregate Write-Ins for Other Products												
4. Total Pre-Reinsurance-Ceded Reserve (Sum of Lines 3.1 through 3.9)	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
5. Total Reserves Ceded (Line 4 minus Line 2)	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
DETAILS OF WRITE-INS												
1.901				XXX	XXX			XXX	XXX		XXX	XXX
1.902				XXX	XXX			XXX	XXX		XXX	XXX
1.903				XXX	XXX			XXX	XXX		XXX	XXX
1.998. Summary of remaining write-ins for Line 1.9 from overflow page				XXX	XXX			XXX	XXX		XXX	XXX
1.999. Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above)				XXX	XXX			XXX	XXX		XXX	XXX
3.901												
3.902												
3.903												
3.998. Summary of remaining write-ins for Line 3.9 from overflow page												
3.999. Totals (Lines 3.901 through 3.903 plus 3.998) (Line 3.9 above)												

VM-20 RESERVES SUPPLEMENT – PART 2
Reserves for Policies Not Based on VM-20 as a
Result of the Three Year Transition Period
 For The Year Ended December 31, 20__
 (To Be Filed by March 1)
 (\$000 Omitted Except for Number of Policies)

	Three Year Transition Period					
	Prior Year		Current Year			
	1 Gross-Reserve	2 Net-Reserve	3 Gross-Reserve	4 Net-Reserve	5 Number of Policies	6 Face Amount
1. Life Insurance Reserves						
1.1. Term Life						
1.2. Universal Life With Secondary Guarantee						
1.3. Non-Participating Whole Life						
1.4. Participating Whole Life						
1.5. Universal Life Without Secondary Guarantee						
1.6. Variable Universal Life						
1.7. Variable Life						
1.8. Indexed Life						
1.9. Aggregate Write-Ins for Other Products						
2. Total Life Insurance Reserves (Sum of Lines 1.1 through 1.9)						
DETAILS OF WRITE-INS						
1.901						
1.902						
1.903						
1.998. Summary of remaining write-ins for Line 1.9 from overflow page						
1.999. Totals (Lines 1.901 through 1.903 plus 1.998) (Line 1.9 above).						

VM-20 RESERVES SUPPLEMENT – PART 3-2
Life PBR Exemption
 For The Year Ended December 31, 20__
 (To Be Filed by March 1)

Life PBR Exemption as defined in the NAIC adopted Valuation Manual (VM)	
1. Has the company filed and been granted a Life PBR Exemption from the reserve requirements of VM-20 of the Valuation Manual by their state of domicile?	Yes [] No []
2. If the response to Question 1 is "Yes", then check the source of the granted "Life PBR Exemption" definition? (Check either 2.1, 2.2 or 2.3)	
2.1 NAIC Adopted VM	[]
2.2 State Statute (SVL)	[] Complete items "a" and "b", as appropriate.
a. Is the criteria in the State Statute (SVL) different from the NAIC adopted VM?	Yes [] No []
b. If the answer to "a" above is "Yes", provide the criteria the state has used to grant the Life PBR Exemption (e.g., Group/Legal Entity criteria) and the minimum reserve requirements that are required by the state of domicile (if the minimum reserve requirements are the same as the Adopted VM, write SAME AS NAIC VM:	
.....	
.....	
.....	
.....	
2.3 State Regulation	[] Complete items "a" and "b", as appropriate.
a. Is the criteria in the State Regulation different from the NAIC adopted VM?	Yes [] No []
b. If the answer to "a" above is "Yes", provide the criteria the state has used to grant the Life PBR Exemption (e.g., Group/Legal Entity criteria) and the minimum reserve requirements that are required by the state of domicile (if the minimum reserve requirements are the same as the Adopted VM, write SAME AS NAIC VM:	
.....	
.....	
.....	
.....	

VM-20 RESERVES SUPPLEMENT – PART 4-3

Other Exclusions from Life PBR

For The Year Ended December 31, 20__

(To Be Filed by March 1)

1A.	Has the company filed and been granted a Single State Exemption from the reserve requirements of VM-20 of the Valuation Manual by their state of domicile?	Yes []	No []
1B.	If the answer to question 1A is "Yes" please discuss any business not covered under the Single State Exemption.		

2A.	If the answer to question 1A is "Yes", does the company have risks for policies issued outside its state of domicile?	Yes []	No []
2B.	If the answer to question 2A is "Yes" please discuss the risks for policies issued outside the state of domicile, how those risks came to be a responsibility of the company, and why the company would still be considered a Single State Company with such risks.		

3.	Is all of the company's individual ordinary life insurance business excluded from the requirements of VM-20 pursuant to Section II.B of the Valuation Manual?	Yes []	No []

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