## Agenda Item Submission Form

### Date: 1/18/24

**Contact Person:** Bruce Jenson (NAIC)  
**Telephone:** 816-783-8348  
**Email Address:** bjenson@naic.org  
**On Behalf Of:** Risk-Focused Surveillance (E) Working Group  
**Name:** Amy Malm - Chair  
**Title:** Administrator, Division of Financial Reg  
**Affiliation:** Wisconsin Office of the Commissioner  
**Address:** 125 S Webster St  
Madison, WI 53703

### FOR NAIC USE ONLY

- Agenda Item #: 2024-05BWG
- Year: 2024
- Changes to Existing Reporting: [ ]
- New Reporting Requirement: [ ]

### Reviewed for Accounting Practices and Procedures Impact

- No Impact: [ ]
- Modifies Required Disclosure: [ ]

### Is There Data Being Requested in This Proposal Which Is Available Elsewhere in the Annual/Quarterly Statement? [ NO ]

### If Yes, Complete Question Below

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### Identification of Item(s) to Change

Add clarifying language to Annual General Interrogatory 29.05 (Quarterly General Interrogatory 17.5) to clarify that all investment advisors with discretion to make investment decisions, including sub-advisors, should be disclosed through the interrogatory.

### Reason, Justification for and/or Benefit of Change

Some insurers are not disclosing sub-advisors with discretion to make investment decisions through the interrogatory.

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### If the Data Is Available Elsewhere in the Annual/Quarterly Statement, Please Note Why It Is Required for This Proposal

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**NAIC Staff Comments**

Comment on Effective Reporting Date:  

Other Comments:  

**This section must be completed on all forms.**

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2024-05BWG.docx

Revised 11/17/2022
GENERAL INTERROGATORIES

PART 1 – COMMON INTERROGATORIES

INVESTMENT

Detail Eliminated To Conserve Space

29.05 Identify all investment advisors, investment managers and broker/dealers, including individuals who have the authority to make investment decisions on behalf of the reporting entity. This includes both primary and sub-advisors. For assets that are managed internally by employees of the reporting entity, note as such.

Name of Firm or Individual:
Should be name of firm or individual that is party to the Investment Management Agreement

Affiliation:
Note if firm or individual is affiliated, unaffiliated or an employee by using the following codes:

A   Investment management is handled by firms/individuals affiliated with the reporting entity.

U   Investment management is handled by firms/individuals unaffiliated with the reporting entity.

I   Investment management is handled internally by individuals that are employees of the reporting entity.

29.0597 If the total assets under management of any the firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 29.05 are greater than 10% of the reporting entity’s invested assets (Line 12 of the Asset page), answer “YES” to Question 29.0597.

29.0598 If the total assets under management of all the firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 29.05 are greater than 50% of the reporting entity’s invested assets (Line 12 of the Asset page), answer “YES” to Question 29.0598. When determining the aggregate total of assets under management, include all firms/individuals unaffiliated with the reporting entity not just those who manage more than 10% of the reporting entity’s assets.

29.06 For assets managed by an affiliated or unaffiliated firm or individual, provide for each firm or individual the Central Registration Depository Number, Legal Entity Identifier (LEI), who they are registered with and if an Investment Management Agreement has been filed for each firm or individual.

Central Registration Depository Number

The Central Registration Depository (CRD) number is a number issued by the Financial Industry Regulatory Authority (FINRA) to brokers, dealers or individuals when licensed, and can be verified against their database www.finra.org. These brokers, dealers or individuals would be those contracted to manage some of the reporting entity’s investments or funds and invest them for the reporting entity. The brokers, dealers or individuals can be affiliated or unaffiliated with the reporting entity. The reporting entity must list all brokers, dealers or individuals who have the authority to make investments on behalf of the reporting entity.

Name of Firm or Individual:
Should be name of firm or individual provided for 29.05.

Central Registration Depository Number
The Central Registration Depository (CRD) number is a number issued by the Financial Industry Regulatory Authority (FINRA) to brokers, dealers or individuals when licensed, and can be verified against their database www.finra.org. These brokers, dealers or individuals would be those contracted to manage some of the reporting entity’s investments or funds and invest them for the reporting entity. The brokers, dealers or individuals can be affiliated or unaffiliated with the reporting entity. The reporting entity must list all brokers, dealers or individuals who have the authority to make investments on behalf of the reporting entity.

Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Registered With:

If a Registered Investment Advisor, specify if registered with Securities Exchange Commission or state securities authority. Note if not a Registered Investment Advisor.

Investment Management Agreement (IMA) Filed:

Indicate if a current Investment Management Agreement (IMA) has been filed with the state of domicile or the insurance department in another state(s). Use one of the codes below to indicate if the IMA has been filed and with whom it was filed.

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>DS</td>
<td>If the current IMA has been filed with the state of domicile regardless if it was also filed with another state.</td>
</tr>
<tr>
<td>OS</td>
<td>If the current IMA has been filed with a state(s) other than the state of domicile but not the state of domicile.</td>
</tr>
<tr>
<td>NO</td>
<td>If the current IMA has not been filed with any state.</td>
</tr>
</tbody>
</table>
17.5 Identify all investment advisors, investment managers and broker/dealers, including individuals who have the authority to make investment decisions on behalf of the reporting entity. This includes both primary and sub-advisors. For assets that are managed internally by employees of the reporting entity, note as such.

**Name of Firm or Individual:**

Should be name of firm or individual that is party to the Investment Management Agreement

**Affiliation:**

Note if firm or individual is affiliated, unaffiliated or an employee by using the following codes:

- A Investment management is handled by firms/individuals affiliated with the reporting entity.
- U Investment management is handled by firms/individuals unaffiliated with the reporting entity.
- I Investment management is handled internally by individuals that are employees of the reporting entity.

17.5097 If the total assets under management of any of the firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 17.5 are greater than 10% of the reporting entity’s invested assets (Line 12 of the Asset page), answer “YES” to Question 17.5097.

17.5098 If the total assets under management of all the firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 17.5 are greater than 50% of the reporting entity’s invested assets (Line 12 of the Asset page), answer “YES” to Question 17.5098. When determining the aggregate total of assets under management, include all firms/individuals unaffiliated with the reporting entity, not just those who manage more than 10% of the reporting entity’s assets.

17.6 For assets managed by an affiliated or unaffiliated firm or individual, provide for each firm or individual the Central Registration Depository Number, Legal Entity Identifier (LEI), who they are registered with and if an Investment Management Agreement has been filed for each firm or individual.

**Central Registration Depository Number**

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**Name of Firm or Individual:**

Should be name of firm or individual provided for 17.5

**Central Registration Depository Number**

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- **DS** If the current IMA has been filed with the state of domicile regardless if it was also filed with another state.
- **OS** If the current IMA has been filed with a state(s) other than the state of domicile but not the state of domicile.
- **NO** If the current IMA has not been filed with any state.
29.05 Investment management – Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. This includes both primary and sub-advisors. For assets that are managed internally by employees of the reporting entity, note as such. ["…that have access to the investment accounts", "…handle securities"]

<table>
<thead>
<tr>
<th>1</th>
<th>Name of Firm or Individual</th>
<th>2</th>
<th>Affiliation</th>
</tr>
</thead>
<tbody>
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29.0597 For those firms/individuals listed in the table for Question 29.05, do any firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) manage more than 10% of the reporting entity’s invested assets? Yes [ ] No [ ]

29.0598 For firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 29.05, does the total assets under management aggregate to more than 50% of the reporting entity’s invested assets? Yes [ ] No [ ]

29.06 For those firms or individuals listed in the table for 29.05 with an affiliation code of “A” (affiliated) or “U” (unaffiliated), provide the information for the table below.

<table>
<thead>
<tr>
<th>1</th>
<th>Central Registration Depository Number</th>
<th>2</th>
<th>Name of Firm or Individual</th>
<th>3</th>
<th>Legal Entity Identifier (LEI)</th>
<th>4</th>
<th>Registered With</th>
<th>5</th>
<th>Investment Management Agreement (IMA) Filed</th>
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</tbody>
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### General Interrogatories

#### Part 1 – Common Interrogatories

**Investment**

**Detail Eliminated To Conserve Space**

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17.5097 For those firms/individuals listed in the table for Question 17.5, do any firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) manage more than 10% of the reporting entity’s invested assets? [Yes [ ] No [ ]]

17.5098 For firms/individuals unaffiliated with the reporting entity (i.e., designated with a “U”) listed in the table for Question 17.5, does the total assets under management aggregate to more than 50% of the reporting entity’s invested assets? [Yes [ ] No [ ]]

17.6 For those firms or individuals listed in the table for 17.5 with an affiliation code of “A” (affiliated) or “U” (unaffiliated), provide the information for the table below.

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