

**COVID-19 PROPERTY/CASUALTY DATA CALL
FREQUENTLY ASKED QUESTIONS AND ANSWERS**

Last Updated: 05/18/2020

1. Should a company submit a report if they don't write any BI coverage or did not write any coverage during 2019/have policies in force as of 12/31/2019?
 - o The submissions are to be completed by group so even if ANY companies within your group wrote BI coverage during 2019 or had policies in force as of 12/31/2019 then we would expect your group to file. If none of the companies in your group wrote BI coverage or you are not part of a group, we do not need a submission.
2. NY and NM are not participating but are still included on the template.
 - o Regarding participating jurisdictions, we would refer to the domestic state of the company/group, but assuming it is a participating state (i.e. every jurisdiction other than NM, NY and the territories other than VI), we would expect the company to file their NM and NY business at the request of that jurisdiction. If the company is domiciled and only licensed in NM and NY, they would likely not file. That is why those two are still in the template.
3. What if the Commercial Multiple Peril (CMP) or Businessowners Policies (BOP) does not include business interruption (BI) coverage?
 - o Please exclude data for policies where BI coverage is not included.
4. Should data be reported for policies other than BOP or CMP if the policy has BI coverage?
 - o Yes, please include data for policies with BI coverage other than BOP in the "Other than BOP" tab. Please include ALL data elements relative to policies with BI coverage and exclude ALL data elements for policies that do not have BI coverage.
5. Should data be included for liability policies where BI coverage is included?
 - o Yes, please include all policies where BI coverage exists and include the BI premium separately in column E, if possible.
6. Should base policy premium be reported if the BI portion is separable?
 - o If the BI premium is separable, please include it in the BI premium column E. If it is not separable, include the total policy premium in Total Premium Written, column D. If the BI premium is separable, you should still include the base policy amount in the Total Policy Premium column D which represents the total premium for the policy including the BI coverage and then separately report the amount attributable to BI coverage in column E.
7. What if the BI coverage is embedded in a base policy and the premium can't be separated? Should the insurer include the full premium amount for the base policy or exclude the data for those policies entirely?
 - o Include the full premium for the policy in "Total Policy Premium", leave blank the "BI Premium (if separable)" and include the remaining data elements for number of policies and percentage of policies with physical loss requirement and virus or similar exclusion.
8. Does CMP include liability insurance or just property insurance?
 - o Answer: Please include all policies where BI coverage exists and if the premium for business interruption can't be separated, you may include the full policy premium in "Total Policy Premium." Please fill in the "BI Premium (if separable)" whenever feasible.

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9. What is the date that the number of employees should be based on?
 - Answer: Typically, this would be when the policy was underwritten, or for policies with mid-term or at-will audits, when the policy was last rated.

10. % of policies that have a physical loss requirement – what does it mean?
 - Answer: Provide the percentage of policies with a physical loss requirement or cause of loss due to property damage. Should be based on policy counts for those policies listed with BI coverage. So, if all your policies have physical loss requirement the answer is 100%.

11. Can companies file as they may do with ORSA or CGAD where, for example, a company may file as multiple holding companies? Or does the NAIC want one submission for the entire group?
 - Answer: While we prefer one submission for each entire group, we can accept multiple submissions for the same group if companies are not duplicated between submissions.

12. Small/Medium/Large Definition is based on employee count, but some insurers don't retain the number of employees or utilize alternate methods for determining the company size for rating purposes. Is there an alternative, acceptable method for filing?
 - Answer: The definition has been broadened to "any method the insurer employs" to make it consistent with the language used by CA in their BI request for information.

13. Are surplus lines insurers expected to respond to this data call?
 - Answer: This data call DOES INCLUDE admitted and non-admitted domestic insurers which could include surplus lines insurers if they are domiciled in a U.S. state or territory. Alien insurers are excluded from this data call. "This was based on Bruce's comment that the IID would collect surplus lines data from alien insurers separately and that states may not have regulatory authority to require special data collection from alien insurers.

14. Premium written may be included in state of origination, not necessarily in the location where the property covered is. Is that okay?
 - Answer: Yes. That is fine.

15. The Premium numbers requested are for total written premium for 2019 and the total policy count requested is for in force policies is for policies in force as of 12/31/2019. Is that the intent and is it understood that means written premium may differ from the premium for the number of policies in force at the end of the year since some policies would expire mid-term?
 - Answer: Yes, it was contemplated that these elements for may be slightly misaligned, but the assumption was it is easier for companies to report it this way and works for the purpose of the data call.

16. Request for premium data (In force as of 12-31-2019) may differ from claims data (reported policies and claims may not overlap)
 - Answer: Yes, that has been contemplated.

17. If a policy covers locations with business income in more than one state should we count that policy once for each state it is written in?

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- Answer: If it's one policy covering multiple states and the premium can't be distributed amongst the states then it should be counted as one policy. If the premium can be distributed amongst the states, then include a policy in each state with associated premium. The assumption here is that each location would have its own risk factors and could also have its own limits and therefore functions like separate bundled policies.
18. Are excess policies to be excluded?
- Yes, please include all policies with BI coverage.
19. What if a policy has a physical loss requirement but the BI coverage does not?
- Please answer the percent with physical loss and percent with virus exclusion based on the BI coverage, so if a claim could be paid for the BI portion specifically, that would result in a positive contribution to the percent of policies columns.
20. If a policy has a total of 150 employees and this is split evenly between two states should we consider this a small business under two states or a medium business under both states?
- Answer: Again, follow the premium. If the premium can be distributed, then consider them as separate bundled policies. If the premium can't be separated for some reason, include the rest of the responses in the same state as the premium.
21. If losses are paid before the claim is completely closed should those be included in paid losses?
- Please include losses on open claims in the case incurred loss column and add it to the paid loss column when the claim is closed.
22. What assurances to companies have that the data will be kept confidential?
- The NAIC will not produce analysis, aggregate reporting, or substantive reporting based on the Confidential Information unless directed by a state department of insurance. The NAIC may disclose Confidential Information to other state insurance regulators or state and federal regulatory bodies only if necessary to further the requesting entity's regulatory authority and only if the entity to whom disclosure is made has the legal authority necessary, and by agreement is obligated, to protect from disclosure and to otherwise preserve the confidential or privileged nature of the Confidential Information it receives. Such disclosure shall occur only as a result of the specific approval of the state department of insurance.