

# Interpretation of the Statutory Accounting Principles Working Group

## INT 20-02: Extension of Ninety-Day Rule for the Impact of COVID-19

### GUIDANCE NULLIFIED OCTOBER 1, 2020

#### INT 20-02 Dates Discussed

March 26, 2020; April 15, 2020; July 30, 2020; August 17, 2020; November 12, 2020

#### INT 20-02 References

*SSAP No. 6—Uncollected Premium Balances, Bills Receivable for Premiums, and Amounts Due From Agents and Brokers* (SSAP No. 6)

*SSAP No. 47—Uninsured Plans* (SSAP No. 47)

*SSAP No. 51—Life Contracts* (SSAP No. 51)

*SSAP No. 65—Property and Casualty Contracts* (SSAP No. 65)

#### INT 20-02 Issue

1. A previously unknown virus began transmitting between October 2019 and March 2020, with the first deaths in the U.S. reported in early March 2020. The disease caused by the virus is known as Coronavirus Disease 2019 (COVID-19). Several states and cities have issued “stay home” orders and forced all non-essential businesses to temporarily close. This has led to a significant increase in unemployment and, in certain states, mandatory closure of many businesses. Total economic damage is still being assessed; however, the total impact is likely to exceed \$1 trillion in the U.S. alone. This interpretation is intended to cover policies impacted by COVID-19.

2. Should a temporary extension of the 90-day rule, extending the nonadmission guidance for premium receivables due from policyholders or agents and for amounts due from policyholders for high deductible policies, and for uncollected uninsured plan receivables (excluding Medicare and similar government plans) be granted for the March 31 and June 30, 2020, (1<sup>st</sup> and 2<sup>nd</sup> quarter) financial statements, for policies in U.S. jurisdictions that have been impacted by COVID-19?

#### INT 20-02 Discussion

3. The Working Group reached a consensus for a one-time optional extension of the ninety-day rule for uncollected premium balances, bills receivable for premiums and amounts due from agents and policyholders and for amounts due from policyholders for high deductible policies and amounts due from non-government uninsured plans, as follows:

- a. For policies in effect and current prior to the date as of the declaration of a state of emergency by the U.S. federal government on March 13, 2020, and policies written or renewed on or after March 13, insurers may follow the timeline described in paragraph 5 before nonadmitting premiums receivable from policyholders or agents as required per SSAP No. 6, paragraph 9.
- b. For uncollected uninsured plan receivables (excluding Medicare and similar government plans) which were current prior to the date of the declaration of a state of emergency by the U.S. federal government on March 13, 2020, and policies written or renewed on or after March 13, insurers may follow the timeline described in paragraph 5 before nonadmitting these balances as required per SSAP No. 47, paragraph 10.a.

- c. For life premium due and uncollected which were current prior to the date of the declaration of a state of emergency by the U.S. federal government on March 13, 2020, and policies written or renewed on or after March 13, insurers may follow the timeline described in paragraph 5 before nonadmitting these balances as required per SSAP No. 51R, paragraph 12.
  - d. For high deductible policies in effect and current prior to the date as of the declaration of a state of emergency by the U.S. federal government on March 13, 2020, and policies written or renewed on or after March 13, insurers may follow the timeline described in paragraph 5 before nonadmitting amounts due from policyholders for high deductible policies as required per SSAP No. 65, paragraph 37.
  - e. Existing impairment analysis remains in effect for these affected policies.
4. The Working Group noted that a 60-day extension had been granted previously for regionally significant catastrophes, including *INT 13-01: Extension of Ninety-Day Rule for the Impact of Hurricane/Superstorm Sandy*; and *INT 05-04: Extension of Ninety-day Rule for the Impact of Hurricane Katrina, Hurricane Rita and Hurricane Wilma*, *INT 17-01: Extension of Ninety-Day Rule for the Impact of Hurricane Harvey, Hurricane Irma and Hurricane Maria*, and *INT 18-04: Extension of Ninety-Day Rule for the Impact of Hurricane Florence and Hurricane Michael*. This recommendation is for a longer period than the extensions that have been granted in the past as COVID-19 is a nationally significant event due to the expected overall impact to the U.S. economy.
5. Due to the short-term nature of this extension, which is only applicable for the March 31 and June 30, 2020, (1<sup>st</sup> and 2<sup>nd</sup> quarter) financial statements and only for the categories of assets listed in paragraph 3, this interpretation will be publicly posted on the Statutory Accounting Principles (E) Working Group's website. This INT will allow assets that meet the definition of paragraph 3 to be admitted assets even if they are greater than 90 days past due. As the exceptions provided in this interpretation are not applicable in the September 30, 2020 (3<sup>rd</sup> quarter) financial statements, this interpretation will automatically expire as of September 29, 2020. This interpretation will be automatically nullified on September 29, 2020, and will be included as a nullified INT in Appendix H – Superseded SSAPs and Nullified Interpretations in the “As of March 2021” *Accounting Practices and Procedures Manual*.
- a. On August 17, 2020, the provisions in this INT were extended to be applicable for the September 30, 2020, (3<sup>rd</sup> quarter) financial statements. With this extension, this Interpretation will automatically expire as of December 30, 2020, (prior to the year-end 2020 financial statements). Subsequent consideration will occur to determine if an extension is needed beyond September 30, 2020.

#### INT 20-02 Status

6. On July 30, 2020, the Statutory Accounting Principles (E) Working Group exposed this interpretation for possible extension to September 30, 2020, (3<sup>rd</sup> quarter financial statements). If the extension were adopted, the proposed paragraph 5.a. would be incorporated into the INT. On August 17, 2020, the Statutory Accounting Principles (E) Working Group extended the provisions of this INT to be applicable for the September 30, 2020, (3<sup>rd</sup> quarter) financial statements, incorporating paragraph 5.a. into the INT.
7. The Statutory Accounting Principles (E) Working Group will subsequently review this interpretation to determine if an extension is needed to the effective date.
8. No further discussion is planned.