INTERNATIONAL INSURANCE RELATIONS (G) COMMITTEE

Draft: 8/26/26

International Insurance Relations (G) Committee
Columbus, Ohio
August 13, 2026

The International Insurance Relations (G) Committee met in Columbus, OH, Aug. 13, 2026. The following Committee members participated: Eric Dunning, Chair (NE); Timothy J. Temple, Vice Chair (LA); Ricardo Lara (CA); Joshua Hershman (CT); John F. King represented by Martin Sullivan (GA); Scott Saiki (HI); Dean L. Cameron (ID); Ann Gillespie (IL); Anita G. Fox (MI); Susan Ochs represented by David Wolf (NJ); Judith L. French (OH); Elizabeth Kelleher Dwyer represented by Beth Vollucci (RI); Jon Pike (UT); and Nathan Houdek and Rebecca Easland (WI).

1. Adopted its July 23 and Spring National Meeting Minutes

Director Dunning reported that the Committee met July 23. During this meeting, the Committee took the following action: 1) adopted a motion to approve NAIC comments on the International Association of Insurance Supervisors (IAIS) public consultation on the draft issues paper on customers receiving value from insurance products; and 2) heard an update on recent and planned activities with the Association of Latin American Insurance Supervisors (ASSAL).

Commissioner Lara made a motion, seconded by Director Cameron, to adopt the Committee's July 23 (Attachment One) and March 24 (*see NAIC Proceedings – Spring 2026, International Insurance Relations (G) Committee*) minutes. The motion passed unanimously.

2. Adopted the Report of the Aggregation Method Implementation (G) Working Group, Including Recommendations to the Committee

Easland reported the Working Group met Aug. 12 (Attachment Two) and took the following action: 1) adopted its June 11, June 2, and Spring National Meeting minutes; 2) discussed its activities, including the conclusion of its review of U.S. group solvency regulation and the status, pending adoption by the Committee, of the review's recommendations for implementation of the insurance capital standard (ICS) via the Aggregation Method (AM); and 3) received an update on the finalization of documentation of the AM.

Commissioner Temple made a motion, seconded by Commissioner Lara, to adopt the report of the Aggregation Method Implementation (G) Working Group.

Next, Easland explained the work the Working Group has undertaken to reach the point of making recommendations to the Committee. She explained that a set of draft recommendations targeted to where potential gaps and refinements could best be addressed was released for public comment in the spring, and feedback was incorporated during a series of meetings that culminated in the approval of an updated set of recommendations. In presenting the final recommendations (Attachment Three) to the Committee, Easland noted that given their high-level nature, they would next be referred to the relevant technical working groups to determine how best to put them into practice.

Director Dunning said the recommendations would be referred to the Financial Condition (E) Committee, and subsequent work will likely take place within the Group Capital Calculation (E) Working Group and would be subject to the usual NAIC process.

Director Fox made a motion, seconded by Director Gillespie, to approve the recommendations of the Aggregation Method Implementation (G) Working Group to be referred to the Financial Condition (E) Committee. The motion passed unanimously.

3. Discussed Activities Related to Cross-Border Reinsurance

Director Dunning explained the growing interest both domestically and internationally in cross-border reinsurance. He provided a review of state insurance regulators' roles in monitoring and contributing to the topic.

Ethan Sonnichsen (NAIC) explained that NAIC work aimed to balance global capital initiatives to ensure U.S. policyholder protection remains a priority. He provided historical background on U.S. and international milestones in cross-border reinsurance issues and the NAIC's involvement in reinsurance collateral and development of the qualified and reciprocal jurisdictions processes. Sonnichsen also highlighted interactions with U.S. federal agencies and other international regulatory organizations, as well as the covered agreements that were signed over the past two decades.

Director Gillespie asked about the potential for other covered agreements in the future. Sonnichsen noted that the NAIC's qualified jurisdiction process is the best way forward, and currently, there are no other covered agreements on the horizon.

William Mason (Guernsey Financial Services Commission—GFSC), Lisa Peterson (GFSC), and Katherine Jane (GFSC) spoke to the Committee about the risk-based capital (RBC) and regulatory framework for insurance regulation in Guernsey, and about how the jurisdiction views cross-border reinsurance from both a market and supervisory perspective. They explained that their regulatory framework is based on principles of the IAIS, as reflected through the Insurance Core Principles (ICPs). Peterson outlined the GFSC's philosophy on capital, which is similar to other jurisdictions in that it is important for understanding risk and is critical to policyholders and consumer protection. Additionally, Jane spoke about the GFSC's role as chair of the Group of International Insurance Centre Supervisors (GIICS).

Commissioner Lara asked the GFSC representatives to expand on how the reinsurers within the GFSC are approaching U.S. climate-related risks, such as those in California. Peterson said reinsurers are most ready to support hurricane risks, but there is interest in legacy-type catastrophe modeling, and there is communication with U.S. underwriters.

Director French asked about specific challenges for the GIICS regions, given their level of geographical and economic diversity. Jane said a primary challenge is that members are made up of small jurisdictions, so bandwidth can be limited, and knowledge sharing is a useful tool to ensure supervisors in smaller jurisdictions are supervising adequately and at a correct level.

4. Heard an Update on IAIS Activities

Director Dunning provided updates on activities at the IAIS, including the appointment of Gerry Cross, formerly of the Central Bank of Ireland, as the new IAIS Secretary General. Committee members involved with the IAIS shared initial positive interactions as he began his appointment.

Director Dunning said that the IAIS Global Seminar Leadership Dialogue was held in July as a virtual event. Commissioner White participated in his capacity as an IAIS Executive Committee Vice Chair. Work is underway on the implementation assessment of the ICS, with the first phase being the baseline assessment (BSA), and participating members recently completed a self-assessment questionnaire template. For the U.S., the template and instructions were designed to reflect the specificities of the AM.

Director Dunning then provided updates on IAIS working groups and task forces. The Operational Resilience Working Group is drafting a members-only report on third-party risk, expected to be published in early 2027. The Market Conduct Working Group is reviewing public consultation comments on its issues paper on customers receiving value from insurance products with a goal of finalizing the paper by the end of the year. The Governance Working Group's member-only guidance on effective interactions with insurers' boards and senior management was recently made available. The Protection Gaps Task Force is developing resources, including case studies and a central information hub, to support supervisors and policymakers in identifying and addressing natural catastrophe insurance protection gaps. The Global Monitoring Exercise is underway, including last month's publication of the mid-year Global Insurance Market Report.

5. <u>Heard an Update on International Cooperation Activities</u>

Commissioner Temple summarized NAIC participation in recent and upcoming international cooperation activities, beginning with an update on the International Monetary Fund's (IMF) Financial Sector Assessment Program (FSAP) of the U.S., which is getting underway. The FSAP will assess the U.S. against a subset of the IAIS ICPs, and Dan Bumpus (VA) is serving as the state regulator lead for this project and will work with NAIC committee support throughout the assessment. The Committee will receive updates on the FSAP as the work progresses.

Next, Commissioner Temple reported on international events since the Spring National Meeting that NAIC members and committee support participated in. In March, El Centro de Investigación para el Desarrollo del Seguro Insurance Week took place in Mendoza, Argentina, and on the sidelines of that, the Association of Latin American Insurane Supervisors (ASSAL) board also held its retreat.

In April, NAIC members and committee support attended the Association of Bermuda Insurers and Reinsurers' Risk Forum, the Bermuda Monetary Authority's (BMA's) Forum in Bermuda, and a series of bilateral meetings with Moroccan insurance officials in Rabat. They also presented at the 12th Rendez-vous de Casablanca de L'Assurance in Casablanca, the Canadian Council of Insurance Regulators meeting in Montreal, and the High-Level Conference on Insurance Supervision for Latin America and the Caribbean in Costa Rica, organized jointly by ASSAL, the Financial Stability Institute, and the IAIS.

In May, NAIC Members and committee support participated in Insurance Europe's 16th International Conference in Brussels, Belgium. In June, they attended the Superintendency of Insurance and Reinsurance of Panama's Insurance Sector Supervision Forum in Panama City, Panama, and in July, they participated in the East Asia Pacific Insurance Forum in Taipei, Taiwan.

Commissioner Temple reported on ASSAL recent activities, including a virtual workshop on natural catastrophe risk exposure, reporting, and resiliency in July.

6. <u>Heard an Update on Financial Strengthening Efforts in Africa</u>

Elias Omondi (Financial Sector Deepening Africa—FSD Africa) provided an update on financial market strengthening efforts to achieve sustainable and inclusive economic growth in Africa.

Commissioner Lara and Director Fox spoke about the value of designing inclusive insurance solutions for climate-related risks and noted the regulatory initiatives' synergy that exists across jurisdictions and welcomed continued conversation.

Having no further business, the International Insurance Relations (G) Committee adjourned.

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International Insurance Relations (G) Committee
Virtual Meeting
July 23, 2026

The International Insurance Relations (G) Committee met July 23, 2026. The following Committee members participated: Eric Dunning, Chair (NE); Timothy J. Temple, Vice Chair (LA); Ricardo Lara (CA); Joshua Hershman represented by Alexander Borkowski (CT); Ann Gillespie represented by Susan Berry (IL); Anita G. Fox represented by Steve Mayhew (MI); Judith L. French (OH); Elizabeth Kelleher Dwyer represented by Patrick Smock (RI); Jon Pike (UT); and Nathan Houdek (WI).

1. Heard an Update on ASSAL Activities

Director Dunning provided an update on the NAIC's engagement with the Association of Insurance Supervisors of Latin America (ASSAL) since becoming an associate member this spring. He noted discussions have taken place on priorities and potential areas of work between the two organizations.

Commissioner Lara reviewed a virtual workshop on natural catastrophe risk exposure, reporting, and resiliency for ASSAL members on July 14. He said that ahead of the workshop, the NAIC circulated a survey to other ASSAL members to gather information on how they collect data on insurer natural catastrophe risk, resiliency efforts, and key topics of interest to explore in the future. Commissioner Lara noted additional efforts as part of the NAIC's membership with ASSAL, including funding scholarships for participation in the NAIC's International Fellows Program, training for actuaries on climate and catastrophe risk, parametric and nature-based insurance solutions, and strategies to better engage with U.S. Latino communities.

2. Adopted a Motion to Approve NAIC Comments on the IAIS Public Consultation of the Draft Issues Paper on Customers Receiving Value from Insurance Products

The International Association of Insurance Supervisors (IAIS) is conducting a public consultation on a draft issues paper on customers receiving value from insurance products.

Director Dunning explained that the purpose of the draft issues paper is to enhance understanding of the importance of insurance products delivering meaningful value to customers and of ways to achieve this. It describes the challenges consumers face in evaluating the value of insurance products when they purchase insurance.

The NAIC's draft comments are based on an internal review by NAIC committee support and members of the Market Regulation and Consumer Affairs (D) Committee. The draft comments were circulated in advance of the meeting, and no additional input was received for consideration.

Director Dunning asked Nikhail Nigam (NAIC) to give an overview of the NAIC's comments on the consultation. Nigam highlighted an addition to a section on supervisory approaches to value that addresses measuring an insured's policy surrender activity.

Next, Nigam explained comments suggesting rewording and reorganizing certain language for a better illustration of U.S. examples already in the paper, as well as the addition of an example about the NAIC *Property and Casualty Model Rating Law* (#1780).

David Snyder (American Property Casualty Insurance Association—APCIA) commented that the paper does not address the role of competition in creating value, and it should be clearer that no single metric can reflect value. He also said the paper does not adequately recognize that policy language is sometimes dictated by a jurisdiction's laws and regulation.

Madison Ward (American Council of Life Insurers—ACLI) commented that the ACLI supports NAIC efforts on the topic of value, as well as efforts to provide better understanding of life insurance products.

Director Fox made a motion, seconded by Commissioner Temple, to approve the submission of the NAIC's comments on the IAIS consultation. The motion passed unanimously.

Having no further business, the International Insurance Relations (G) Committee adjourned.

Draft: 8/14/26

Aggregation Method Implementation (G) Working Group
Columbus, Ohio
August 12, 2026

The Aggregation Method Implementation (G) Working Group of the International Insurance Relations (G) Committee met in Columbus, OH, Aug. 12, 2026. The following Working Group members participated: Rebecca Easland, Chair (WI); John F. Rehagen, Vice Chair (MO); William Arfanis (CT); Kevin Clark (IA); Susan Berry (IL); Christopher Joyce (MA); Anthony Quandt (NE); Bob Kasinow (NY); Patrick Smock (RI); and Dan Bumpus (VA).

1. Adopted its June 11, June 2, and Spring National Meeting minutes

The Working Group met June 11 and June 2. During these meetings, it took the following action: 1) heard a presentation on the benefits of scaling jurisdictional regimes for supervisory analysis purposes; 2) discussed and finalized recommendations for the implementation of the insurance capital standard (ICS) via the Aggregation Method (AM); and 3) received a summary of the draft exposure comments and discussed potential resolutions.

Rehagen made a motion, seconded by Arfanis, to adopt the Working Group's June 11 (Attachment Two-A), June 2 (Attachment Two-B), and March 23 (*see NAIC Proceedings – Spring 2026, International Insurance Relations (G) Committee*) minutes. The motion passed unanimously.

2. Discussed its Upcoming Activities

Easland presented an update on the Working Group's activities. Specifically, the Working Group discussed the conclusion of its review of U.S. group solvency regulation and the status, pending adoption by the International Insurance Relations (G) Committee, of the review's recommendations for implementing the ICS via the AM.

3. Heard an Update on the Finalization of the AM

Ned Tyrrell (NAIC) provided an update on the finalization of the AM. This included a comparison of the final AM to the provisional AM released in 2023, the process/timeline for finalization, and a description of the working draft that will be posted later in August. Quandt asked if this document is being written for the International Association of Insurance Supervisors (IAIS) or for domestic purposes. Easland responded that this is being written for the U.S., but it will be made public to anyone (including the IAIS). Kasinow asked if the release of this document is affected by the timing of the Financial Sector Assessment Program (FSAP). Ryan Workman (NAIC) responded that it is not.

Having no further business, the Aggregation Method Implementation (G) Working Group adjourned.

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Aggregation Method Implementation (G) Working Group
Virtual Meeting
June 11, 2026

The Aggregation Method Implementation (G) Working Group of the International Insurance Relations (G) Committee met on June 11, 2026. The following Working Group members participated: Rebecca Easland, Chair (WI); John F. Rehagen, Vice Chair (MO); Jared Kosky (CT); Kevin Clark (IA); Susan Berry (IL); Christopher Joyce (MA); Anthony Quandt (NE); David Wolf (NJ); Bob Kasinow (NY); Diana L. Sherman (PA); Elizabeth Kelleher Dwyer and Patrick Smock (RI); and Scott A. White and Dan Bumpus (VA).

1. <u>Heard a Presentation on the Benefits of Scaling Jurisdictional Regimes for Supervisory Analysis Purposes</u>

Easland discussed the purpose of the Aggregation Method (AM) review, which is to leverage existing tools to the greatest extent possible. Where gaps are identified, the review recommends changes. She noted that a full list of these recommendations was discussed during the Working Group's June 2 meeting and is summarized in the meeting materials. She invited Ned Tyrrell (NAIC) to discuss an example of what one of the scaling recommendations under Section 3.2 would look like in practice. Madison Ward (American Council of Life Insurers—ACLI) asked clarifying questions on the role of excess capital and average jurisdictional ratios in the example. Tyrrell responded that these same figures are used in the excess relative ratio approach in the group capital calculation (GCC).

Wolf asked to confirm whether the proposed table would be confidential. Tyrrell confirmed that the proposed table is for use by supervisory colleges. He put forward language, based on the commit that made clear that the selections in the table are at the discretion of the group-wide supervisors and, similar to other analysis performed on the GCC, are not subject to public disclosure requirements.

Easland asked for questions on the proposed language. Ward said that the language about confidentiality is welcome.

2. <u>Finalized Recommendations for Implementation of the ICS via the AM</u>

Rehagen made a motion, seconded by Clark, to approve the recommendations (including the language on selections made on the proposed table) for submission to the International Insurance Relations (G) Committee. The motion passed unanimously.

Having no further business, the Aggregation Method Implementation (G) Working Group adjourned.

Draft: 8/6/26

Aggregation Method Implementation (G) Working Group
Virtual Meeting
June 2, 2026

The Aggregation Method Implementation (G) Working Group of the International Insurance Relations (G) Committee met on June 2, 2026. The following Working Group members participated: Rebecca Easland, Chair (WI); John F. Rehagen, Vice Chair (MO); William Arfanis and Jared Kosky (CT); Kevin Clark (IA); Susan Berry (IL); Christopher Joyce (MA); Anthony Quandt (NE); David Wolf (NJ); Bob Kasinow (NY); Diana L. Sherman (PA); Elizabeth Kelleher Dwyer and Patrick Smock (RI); and Scott A. White and Dan Bumpus (VA).

1. Received a Summary of the Draft Exposure Comments and Discussed Potential Resolutions

Easland gave an overview of the comments received on the Working Group's draft exposure paper and potential resolutions. Ned Tyrrell (NAIC) went over the individual recommendations, which are in Sections 3, 4, 5, and 6 of the paper.

Tyrrell went over the two recommendations in Section 3. The first is to update the entity categories in the aggregation method (AM). Tyrrell said responses to the exposure document were supportive, and the proposal is to leave the recommendation unchanged. There were no further comments.

Tyrrell described responses to the second recommendation in Section 3.2. The draft recommendation was to add functionality to the group capital calculation (GCC) template to allow scaling to other regimes. He said that responses questioned whether this additional calculation is necessary and that it could cause confusion. He described an alternative where scaling to other levels would be provided as an automatic calculation at the entity-level but without calculating an alternative group-level ratio.

Mariana Gomez-Vock (American Council of Life Insurers—ACLI) raised concerns about converting the ratios and said they are not fully addressed by Option 2. Clark said that he does not have a strong preference but said it could be useful to have a calculation like in this template. Quandt asked to clarify that this is the same calculation as in the GCC but reversed to scale to the level of a non-U.S. regime. Tyrrell confirmed this understanding. Wolf said he is not certain of the value at the individual regulator level, but it could be useful in discussions among regulators at the international level. He also questioned whether it places a burden on insurance groups and asked about alternatives. Tyrrell said that no further data would be required from groups. Easland said more discussion is needed and asked for interested parties to provide further comment before the next call.

For Section 4, Tyrrell outlined recommendations to increase the AM's interest-rate sensitivity. Gomez-Vock said that the ACLI would be concerned if a new group-level stress test were added. Tyrrell confirmed that this describes stresses already being performed and not a new requirement.

For Section 5, Tyrrell described comments that were supportive of providing principles that reinforce GCC's role as a supervisory tool but questioned a potential gap about identifying the "ratios at which they apply." He said that language was deleted. There were no comments.

For Section 6, Tyrrell stated the recommendation is to wait until the International Association of Insurance Supervisors (IAIS) has finalized its standard for reporting/disclosure of the insurance capital standard (ICS) before determining the appropriate approach for the AM. Gomez-Vock noted that while final standards have not yet been published, she would advise caution, as the AM is being implemented through the GCC, which is subject to strict confidentiality requirements. John Muska (American Property Casualty Insurance Association—APCIA) suggested that the Risk-Based Capital Model Governance (EX) Task Force's work could be useful in addressing this issue.

Easland requested any further comments and asked that they be provided by June 5 to allow for discussion during the Working Group's June 11 meeting.

Having no further business, the Aggregation Method Implementation (G) Working Group adjourned.

Recommendations on Review of the US Group Solvency System

Background: The following are recommendations from the Aggregation Method Implementation (G) Working Group's (AMIWG) document, *US Group Solvency Regulation Review: Implementation of the Insurance Capital Standard via the Aggregation Method,* which was developed in early 2026 and exposed for public comment this Spring. The *Review* was developed based on technical work undertaken by AMIWG in 2025. The recommendations reflect discussions and revisions informed by regulator and interested party feedback from a regulator-only call (May 21) and two open calls (June 2 and June 11). The recommendations are targeted to where identified gaps can best be addressed: the Final Aggregation Method (AM) document; the Group Capital Calculation (GCC); ORSA; and/or additional work by AMIWG.

The recommendations were approved by AMIWG on its June 11 call. Following discussion and approval by the G Committee, the recommendations will be referred to the appropriate group(s) under the E Committee for implementation, where relevant.

Section 3.1: Excess Relative Ratio Scalars in GCC and AM	
Gap Identified: GCC entity categories used in the Provisional AM have been updated more recently.	**Recommendation for Final AM:** The list of entity categories in the Final AM should reflect all updates made to the GCC.
Section 3.2: Consideration of Comparability Assessment	
Gap Identified: Without scaling, differences in reserve conservatism between US and other regimes lead to inconsistencies in aggregated capital.	**Recommendation for GCC:** The GCC template should include the full calculation (including base and local average capital levels) of the scaled results for each entity category. This would be an automatic calculation using the same inputs as the current GCC; no further data would need to be filed. GCC results would (as always) be scaled to US capital levels but other bases may be used for analysis purposes on an entity category basis by the group-wide supervisor. This tool would be available to help regulators translate between capital ratios in the US as compared to other

	jurisdictions and thereby facilitate the use of AM/GCC as a common language. Any selections made in this table are at the discretion of the group-wide supervisor and would be used within the Supervisory College framework. The selections and resulting ratios would not be disclosed outside of the Supervisory College, are not subject to public disclosure requirements, and will be confidential similar to other analysis that regulators perform on the GCC.
Section 4: Sensitivity to Changes in Interest Rates	
Gap identified: The move to PBR will increase sensitivity but data on how quickly this transition is happening is not readily available to state insurance regulators.	**Recommendation for GCC:** IAIGs should provide a summary of reserves by valuation manual in their GCC template. This would be a high-level summary of the reporting in Exhibit 5 in the Annual Statements of US legal entities owned by the IAIG. The summary reserves are aggregated into PBR, Legacy and Other categories.
Section 4.2 Impact of Scalars on Interest Rate Sensitivity	
Gap Identified: Even when scaled, levels of reserve conservatism can vary with interest rate levels and by type of business.	**Recommendation for Final AM and GCC:** There should be a formal process for updating scalars for all material jurisdictions. Scalars should be updated separately for entity categories that cover, at a minimum, life versus property/casualty (non-life).
Section 4.3.1 (i) Other Tools & ORSA	
Gap Identified: The ORSA manual section on "Additional Expectations for Internationally Active Insurance Groups" does not mention the GCC. The current manual says that the ORSA should show both the economic capital and the "regulatory capital at the head of the IAIG level". The "economic capital" is the risk capital that is assessed in the main 3 sections of the ORSA. RBC is the regulatory capital at the legal entity level. The GCC is an aggregation of entity-	**Recommendation for ORSA:** Clarify treatment of GCC in the "Additional Expectations for Internationally Active Insurance Groups" at the end of the ORSA guidance manual to say that GCC is an appropriate choice for reporting the "regulatory capital at the head of the IAIG level".

based requirements that produces regulatory capital at the head of the IAIG level.	
Section 4.3.1 (ii) and Section 4.3.2 Other Tools & Scenario Testing	
Gap Identified: [In addition to gaps in 4.3.1 (i)] Impact of changes in interest rates on US life IAIG results can be opaque to regulators.	**Recommendation for additional guidance:** AMIWG could produce material with examples of how scenario testing (particularly of interest rates by life IAIGs) may be done on GCC results. This would not itself be a requirement. Rather it would explain how the existing principle-based requirements (such as Section 3B of the ORSA) may work in practice and illustrate how such analysis may be performed, including examples of approaches already used by groups. [Proposed addition] **Recommendation for GCC:** Template should include a 'sensitivity test' for life IAIGs to provide a description of an interest rate scenario that was calculated for their ORSA and the corresponding impact on their GCC ratio. [Proposed addition]
Section 5: Supervisory Intervention on Group Capital Grounds	
Gap Identified: The NAIC Financial Analysis Handbook procedures call for regulators to "consider the need for company discussions for reduction in risk" when there are "meaningful decreases in GCC ratio". More clarity is needed on potential content of these discussions.	**Recommendation for GCC:** Update "Procedure Step 5" of the GCC Lead State Procedures with examples and principles that describe how GCC ratios could inform discussions of group capital adequacy of IAIGs.
Section 6: Reporting and Disclosure	
Possible Gap: ComFrame reporting and disclosure requirements will be finalized in Q4 of 2026 following consideration and potential revisions based on public consultation comments. Implementation would need to consider what is possible in an aggregation-based construct (compared to the consolidated	**Recommendation [for AMIWG]:** After the finalization of the relevant ComFrame requirements, AMIWG should develop options for how ComFrame public reporting requirements could be implemented. Consideration should be given to factors such as the outcome to be achieved, reliance on existing legal entity level

balance sheet construct of the ICS) as well as appropriate for the US regulatory approach.	reporting and information needed to aggregate legal entity results across the IAIG.