ACCOUNTING PRACTICES AND PROCEDURES (E) TASK FORCE
Thursday, March 23, 2023
11:00 a.m. – 12:00 p.m.
Kentucky Convention Center—Ballroom C—Main Concourse Level

ROLL CALL

Cassie Brown, Chair  Texas  Troy Downing  Montana
Mike Causey, Vice Chair  North Carolina  Joseph Rios Jr.  N. Mariana Islands
Mark Fowler  Alabama  Eric Dunning  Nebraska
Lori K. Wing-Heier  Alaska  Chris Nicoloopoulos  New Hampshire
Alan McClain  Arkansas  Marlene Caride  New Jersey
Ricardo Lara  California  Adrienne A. Harris  New York
Andrew N. Mais  Connecticut  Jon Godfrey  North Dakota
Trinidad Navarro  Delaware  Judith L. French  Ohio
Karima M. Woods  District of Columbia  Glen Mulready  Oklahoma
Michael Yaworsky  Florida  Andrew R. Stolfi  Oregon
Michelle B. Santos  Guam  Michael Humphreys  Pennsylvania
Dean L. Cameron  Idaho  Elizabeth Kelleher Dwyer  Rhode Island
Doug Ommen  Iowa  Michael Wise  South Carolina
Vicki Schmidt  Kansas  Larry D. Deiter  South Dakota
Sharon P. Clark  Kentucky  Carter Lawrence  Tennessee
James J. Donelon  Louisiana  Jon Pike  Utah
Timothy N. Schott  Maine  Kevin Gaffney  Vermont
Gary D. Anderson  Massachusetts  Scott A. White  Virginia
Anita G. Fox  Michigan  Mike Kreidler  Washington
Grace Arnold  Minnesota  Allan L. McVey  West Virginia
Chlora Lindley-Myers  Missouri  Nathan Houdek  Wisconsin

NAIC Support Staff: Robin Marcotte

AGENDA

1. Consider Adoption of its 2022 Fall National Meeting Minutes
   —Jamie Walker (TX)  Attachment One

2. Consider Adoption of its Working Group Reports
   A. Statutory Accounting Principles (E) Working Group
      —Dale Bruggeman (OH)  Attachment Two
   B. Blanks (E) Working Group—Pat Gosselin (NH)  Attachment Three
3. Discuss Any Other Matters Brought Before the Task Force
   —Jamie Walker (TX)

4. Adjournment
The Accounting Practices and Procedures (E) Task Force met in Tampa, Fl, Dec. 14, 2022. The following Task Force members participated: Cassie Brown, Chair, represented by Jamie Walker (TX); Mike Causey, Vice Chair, represented by Jackie Obusek (NC); Mark Fowler represented by Sheila Travis (AL); Alan McClain represented by Chris Erwin (AR); Ricardo Lara represented by Kim Hudson and Susan Bernard (CA); Andrew N. Mais represented by William Arfanis (CT); Karima M. Woods represented by N. Kevin Brown (DC); Trinidad Navarro represented by Rylenn Brown (DE); David Altmaier represented by Virginia Christy (FL); Doug Ommen represented by Kevin Clark (IA); Dean L. Cameron represented by Eric Fletcher (ID); Vicki Schmidt represented by Tish Becker (KS); James J. Donelon represented by Melissa Gibson (LA); Gary D. Anderson represented by John Turchi (MA); Timothy N. Schott represented by Vanessa Sullivan (ME); Anita G. Fox represented by Judy Weaver and Steve Mayhew (MI); Grace Arnold represented by Kathleen Orth (MN); Chlora Lindley-Myers represented by Debbie Doggett (MO); Troy Downing represented by Erin Snyder (MT); Jon Godfread represented by Matt Fischer (ND); Eric Dunning represented by Lindsay Crawford (NE); Marlene Caride represented by John Sirovetz (NJ); Chris Nicolopoulos represented by Pat Gosselin (NH); Adrienne A. Harris represented by Bob Kasinow (NY); Judith L. French represented by Dale Bruggeman (OH); Michael Humphreys represented by Melissa Greiner (PA); Elizabeth Kelleher Dwyer represented by John Tudino (RI); Michael Wise represented by Thomas Baldwin (SC); Larry D. Deiter represented by Johanna Nickelson (SD); Carter Lawrence represented by Trey Hancock (TN); Jon Pike represented by Malis Rasmussen (UT); Scott A. White represented by Greg Chew and Doug Stolte (VA); Kevin Gaffney represented by Karen Ducharme (VT); Mike Kreidler represented by Steve Drutz (WA); and Jeff Rude represented by Doug Melvin (WY).

1. Adopted its Summer National Meeting Minutes

Walker directed the members to the Task Force’s Summer National Meeting minutes. Hancock made a motion, seconded by Orth, to adopt the Task Force’s Aug. 11 minutes (see NAIC Proceedings – Summer 2022, Accounting Practices and Procedures (E) Task Force). The motion passed unanimously.


Bruggeman provided the report of the Statutory Accounting Principles (E) Working Group, which met Dec. 13. During this meeting, the Working Group adopted its Nov. 16, Oct. 24, Oct. 6, and Summer National Meeting minutes. Bruggeman stated that during its Nov. 16 meeting, the Working Group took the following action:

A. Exposed, until Feb. 23, 2023, as new statutory accounting principle (SAP) concepts, a revised Statement of Statutory Accounting Principles (SSAP) No. 26R—Bonds, SSAP No. 43R—Loan-Backed and Structured Securities, and a document that details revisions to other SSAPs to reflect updated proposed guidance under the principles-based bond project.

B. Exposed, until Dec. 1, 2022, revisions to Interpretation (INT) 22-02: Third Quarter 2022 Reporting of the Inflation Reduction Act – Corporate Alternative Minimum Tax to extend the effective date to include year-end 2022 and first-quarter 2023 with an additional disclosure regarding applicable entities. This INT provides an exception related to accounting impacts of the federal Inflation Reduction Act. This action was taken in lieu of proceeding with INT 22-03: Inflation Reduction Act – Corporate Alternative Minimum Tax.
C. Received comments on negative interest maintenance reserve (IMR) in regard to bonds sales in the current rising interest rate environment.

Bruggeman stated that during its Oct. 24 meeting, the Working Group took the following action:

A. Adopted INT 22-02, which includes proposed changes for new required disclosures and allows a subsequent event exception but does not require reporting changes for the third quarter of 2022 as reasonable estimates cannot be made.

B. Discussed INT 22-03 and planned further discussion during its Nov. 16 meeting.

Bruggeman stated that during its Oct. 6 meeting, the Working Group took the following action:

A. Exposed INT 22-02 to include accounting exceptions to the federal Inflation Reduction Act for the third quarter of 2022, with required disclosures.

B. Exposed INT 22-03 to address the fourth-quarter 2022 and interim 2023 accounting of the Inflation Reduction Act.

Bruggeman stated that during its Dec. 13 meeting, the Working Group adopted the following clarifications to statutory accounting guidance:

A. SSAP No. 19—Furniture, Fixtures, Equipment and Leasehold Improvements and SSAP No. 73—Health Care Delivery Assets and Leasehold Improvements in Health Care Facilities: Revisions clarify that leasehold improvements shall be immediately expensed upon lease termination, unless limited exceptions are met. (Ref #2021-25)

B. SSAP No. 25—Affiliates and Other Related Parties and SSAP No. 97—Investments in Subsidiary, Controlled and Affiliated Entities: Revisions identify foreign open-end investment funds as a fund in which ownership percentage is not deemed to reflect control unless the entity actually controls with the power to direct the underlying company. (Ref #2022-13)

C. SSAP No. 36—Troubled Debt Restructuring: Revisions reject Accounting Standards Update (ASU) 2022-02, Troubled Debt Restructurings and Vintage Disclosures and identify that retained guidance reflects superseded U.S. generally accepted accounted principles (GAAP). (Ref #2022-10)

D. SSAP No. 86—Derivatives: Revisions adopt with modification derivative guidance from ASU 2017-12, Derivatives and Hedging and ASU 2022-01, Fair Value Hedging – Portfolio Layer to include guidance for the portfolio layer method and partial-term hedges. These revisions are effective Jan. 1, 2023, with early adoption permitted. (Ref #2022-09)

E. INT 22-02: Third Quarter 2022 through First Quarter 2023 Reporting of the Inflation Reduction Act – Corporate Alternative Minimum Tax: Revisions extend INT 22-02 for Dec. 31, 2022, and first-quarter 2023 statutory financial statements. This INT provides an exception that does not require entities to assess valuation allowance and deferred tax asset impacts from the federal Inflation Reduction Act for the third quarter of 2022 through the first quarter of 2023. It also provides subsequent event exceptions.

Bruggeman stated that the Working Group exposed an agenda item and discussion document that proposes a new or revised SSAP No. 93—Low-Income Housing Tax Property Credit Property Investments to expand current guidance to capture all tax equity investments that qualify under specified criteria and provide general federal...
business tax credit or state premium tax credits for a public comment period ending Feb. 10, 2023. (Ref #2022-14)

Bruggeman stated that the Working Group exposed the following SAP clarifications to statutory accounting guidance for a public comment period ending Feb. 10, 2023:

A. **SSAP No. 5R—Liabilities, Contingencies and Impairments of Assets:** Re-exposure revises the definition of a liability to be consistent with the Financial Accounting Standards Boards (FASB) Concepts Statement and directs NAIC staff to collaborate with interested parties on proposed clarifying language. The exposure also included a new Issue Paper No. 16X—Updates to the Definition of a Liability. (Ref #2022-01)

B. **SSAP No. 7—Asset Valuation Reserve and Interest Maintenance Reserve:** Exposure of the agenda item on IMR guidance focuses on negative IMR. The exposure requested industry to provide potential guardrails and details on unique considerations. It also directed NAIC staff to coordinate a joint regulator discussion with the Life Actuarial (A) Task Force and to develop a memorandum regarding considerations for state insurance regulators. (Ref #2022-19)

C. **SSAP No. 21R—Other Admitted Assets:** Revisions clarify that an asset pledged as collateral must qualify as an admitted invested asset for a collateral loan to be admitted. (Ref #2022-11)

D. **SSAP No. 25:** Revisions clarify that any invested asset held by a reporting entity that is issued by an affiliated entity, or that includes the obligations of an affiliated entity, is an affiliated investment. (Ref #2022-15)

E. **SSAP No. 34—Investment Income Due and Accrued:** Exposure proposes additional disclosures for interest income due and paid-in-kind (PIK) interest included in current principal balances. It also supports a blanks proposal to data-capture the disclosure. (Ref #2022-17)

F. **SSAP No. 100R—Fair Value:** Exposure proposes to adopt with modification ASU 2022-03, Fair Value Measurement of Equity Securities Subject to Contractual Sale. (Ref #2022-16)

G. **SSAP No. 105R—Working Capital Finance Investments:** Exposure proposes to reject ASU 2022-04, Disclosure of Supplier Finance Program Obligations for statutory accounting. (Ref #2022-18)

H. New Issue Paper: Exposure proposes a new issue paper to detail revisions previously adopted with the review of ASU 2017-12, Derivatives and Hedging and 2022-01 Fair Value Hedging – Portfolio Layer Method. (Ref #2017-33)

I. **Schedule D Reporting:** Exposure details proposed reporting changes for bonds in response to the principles-based bond project. In addition to a new schedule and granular reporting lines, the exposure includes proposed revisions to other schedules and instructions that reference bond reporting. A corresponding blanks proposal will be developed for exposure by the Blanks (E) Working Group. The exposure also included a revised issue paper to detail current discussions and decisions on the bond project. (Ref #2019-21)

J. **INT 03-02: Modification to an Existing Intercompany Pooling Arrangement:** Re-exposure nullifies INT 03-02 as it is inconsistent with SSAP No. 25 with comments requested on specific items. (Ref #2022-12)

Bruggeman stated that the Working Group received updates on the following items:
A. Received an update on U.S. GAAP exposures, noting that pending items will be addressed during the normal maintenance process.

B. Received an update on the status of items in the referral from the Macroprudential (E) Working Group.

Bruggeman made a motion, seconded by Clark, to adopt the report of the Statutory Accounting Principles (E) Working Group (Attachment One). The motion passed unanimously.


Gosselin provided the report of the Blanks (E) Working Group, which met Nov. 17. During this meeting, the Working Group adopted its June 8 and May 25 minutes (see NAIC Proceedings – Summer 2022, Accounting Practices and Procedures (E) Task Force, Attachment Two-A and Attachment Two-B).

Gosselin stated the Working Group adopted its editorial listing and the following two proposals:

A. 2022-12BWG – Combine the Health Analysis of Operations by Lines of Business Supplement page and the Health Care Receivable Supplement pages (Exhibit 3 and Exhibit 3A) into one supplement filing set for health blank pages filed as a supplement by life/fraternal companies.

B. 2022-19BWG Modified – Modify the Life Insurance (State Page) to include the line of business detail reported on the Analysis of Operations by Lines of Business pages. The proposal adds definitions for life and annuity products to the lines of business definitions in the health appendix.

Gosselin stated the Working Group exposed six new proposals for a public comment period ending Feb. 1, 2023.

Gosselin stated the Working Group approved adding language to the blanks proposal form to address duplication of reporting and reviewed its 2023 proposed charges adopted by the Financial Condition (E) Committee.

Gosselin stated the Working Group received a Statutory Accounting Principles (E) Working Group memorandum referencing INT 22-02 and directed its public posting.

Gosselin stated the Working Group approved the state filing checklists.

Gosselin made a motion, seconded by Doggett, to adopt the report of the Blanks (E) Working Group (Attachment Two). The motion passed unanimously.

Having no further business, the Accounting Practices and Procedures (E) Task Force adjourned.

https://naiconline.sharepoint.com/sites/NAICSupportStaffHub/Member Meetings/E CMTE/APPTF/2022FallNM/Minutes/APPTF12.14.2022 minutestpr.docx
Meeting Summary Report

The Statutory Accounting Principles (E) Working Group met March 22, 2023. During this meeting, the Working Group:

1. Adopted its Fall National Meeting minutes.


3. Adopted the following clarifications to statutory accounting guidance:

   A. SSAP No. 25—Affiliates and Other Related Parties: Revisions clarify that any invested asset held by a reporting entity that is issued by an affiliated entity, or which includes the obligations of an affiliated entity is an affiliated investment. (Ref #2022-15)

   B. SSAP No. 34—Investment Income Due and Accrued: Revisions add and data-capture additional disclosures. Directed NAIC staff to submit a corresponding blanks proposal to the Blanks (E) Working Group for year-end 2023. (Ref #2022-17)

   C. SSAP No. 100R—Fair Value: Revisions adopt, with modification, Accounting Standards Update (ASU) 2022-03, Fair Value Measurement of Equity Securities Subject to Contractual Sales Restrictions, with modification to reject the contractual sales restrictions disclosures. (Ref #2022-16)

   D. SSAP No. 105R—Working Capital Finance Investments: Rejects guidance from ASU 2017-12, Derivatives and Hedging and ASU 2022-04, Disclosure of Supplier Finance Program Obligations, as the disclosures are for borrowers, not insurance entity investors. (Ref #2022-18)

4. Exposed the following SAP clarifications to statutory accounting guidance until June 9, except for agenda items 2023-03 and 2023-11EP, which have a comment deadline of May 5:
A. **SSAP No. 5R—Liabilities, Contingencies and Impairments of Assets and Issue Paper No. 16X—Updates to the Definition of a Liability**: Exposure includes revisions that defer to topic-specific SSAP guidance that varies from the liability definition. (Ref #2022-01)

B. **SSAP No. 20—Nonadmitted Assets and SSAP No. 21R—Other Admitted Assets**: Exposed revisions clarify that pledged collateral must qualify as an admitted invested asset for a collateral loan to be admitted. The revisions require audits and the use of net equity value for valuation assessments when the pledged collateral is in the form of partnerships, limited liability companies, or joint ventures. (Ref #2022-11)

C. **SSAP No. 24—Discontinued Operations and Unusual or Infrequent Items**: Exposed revisions to SSAP No. 24 to clarify rejection of ASU 2021-10, Government Assistance, and the incorporation of disclosures regarding government assistance. (Ref #2023-06)

D. **SSAP No. 43R—Loan-Backed and Structured Securities**: Exposed revisions to incorporate changes to add collateralized loan obligations (CLOs) to the financial modeling guidance and to clarify that CLOs are not captured as legacy securities. (Ref #2023-02)

E. **SSAP No. 104R—Share-Based Payments and SSAP No. 95—Nonmonetary Transactions**: Exposed revisions to adopt with modification ASU 2019-08, Compensation—Stock Compensation (Topic 718) and Revenue from Contracts with Customers (Topic 606): Codification Improvements—Share-Based Consideration Payable to a Customer. The revisions add guidance to include share-based consideration payable to customers. (Ref #2023-07)

F. **Interpretation (INT) 03-02: Modification to an Existing Intercompany Pooling Arrangement**: Exposed the intent to nullify INT 03-02, as it is inconsistent with SSAP No. 25. (Ref #2022-12)

G. **INT 20-01: ASU 2020-04 and 2021-01 – Reference Rate Reform**: Exposed revisions to revise the expiration date of INT 20-01 to Dec. 31, 2024. (Ref #2023-05)

H. **Schedule D Reporting**: Exposed revisions to SSAP No. 26R—Bonds, SSAP No. 21R, SSAP No. 43R, and other impacted SSAPs to refine guidance for the principles-based bond project. Directed NAIC staff to continue interim discussions with interested parties. (Ref #2019-21)

I. **Review Annual Statement Instructions for Accounting Guidance**: Exposed a proposed new project to review the annual and quarterly statement instructions to ensure that accounting guidance is reflected within the SSAPs. (Ref #2023-01)

J. **C-2 Mortality Risk Note**: Exposed revisions to SSAP No. 51R—Life Contracts, SSAP No. 59—Credit Life and Accident and Health Insurance Contracts, and SSAP No. 61R—Life, Deposit-Type and Accident and Health Reinsurance providing new disclosures, which provide net amount at risk detail needed to support updates to the life risk-based capital (RBC) C-2 mortality risk charges. This item was exposed with a shortened comment deadline of May 5. (Ref #2023-03)
K. Accounting Practices and Procedures Manual (AP&P Manual) Editorial Updates: Exposed editorial revisions. This item was exposed with a shortened comment deadline of May 5. (Ref #2023-11EP)

L. Appendix D—Nonapplicable GAAP Pronouncements: The following U.S. GAAP standards were exposed with revisions to reject, as they are not applicable to statutory accounting:
   i. ASU 2019-07—Codification Updates to SEC Sections: Amendments to SEC Paragraphs Pursuant to SEC Final Rule Releases No. 33-10532, Disclosure Update and Simplification, and Nos. 33-10231 and 33-10442, Investment Company Reporting Modernization, and Miscellaneous Updates (Ref #2023-08)
   ii. ASU 2020-09, Amendments to SEC Paragraphs Pursuant to SEC Release No. 33-10762—Debt (Topic 470) (Ref #2023-09)
   iii. ASU 2022-05, Transition for Sold Contracts, as not applicable for statutory accounting. (Ref #2023-10)

5. Directed NAIC staff on the following items:

A. Tax Credits: Directed NAIC staff to proceed with drafting revised accounting guidance and a related issue paper for both SSAP No. 93—Low-Income Housing Tax Credit Property Investments and SSAP No. 94R—Transferable and Non-Transferable State Tax Credits. Revisions will consider final Financial Accounting Standards Board (FASB) guidance on tax equity investments and interested party feedback. (Ref #2022-14)

B. SSAP No. 7—Asset Valuation Reserve and Interest Maintenance Reserve: Directed NAIC staff regarding the consideration of negative interest maintenance reserve (IMR) with an intent to work on both a 2023 solution and a long-term solution as follows:
   i. Recommend a referral to the Life Actuarial (A) Task Force on further consideration of the asset adequacy implications of negative IMR. Items to include: 1) developing a template for reporting within asset adequacy testing (AAT); 2) considering the actual amount of negative IMR that is admitted to be used in the AAT; 3) better consideration of cash flows within AAT (and documentation), as well as any liquidity stress test (LST) considerations; 4) ensuring that excessive withdrawal considerations are consistent with actual data (sales of bonds because of excess withdrawals should not use the IMR process); and 5) ensuring that any guardrails for assumptions in the AAT are reasonable and consistent with other aspects.
   ii. Recommend a referral to the Capital Adequacy (E) Task Force for the consideration of eliminating any admitted net negative IMR from total adjusted capital (TAC) and the consideration of sensitivity testing with and without negative IMR.
   iii. Develop guidance for future Working Group consideration that would allow the admission of negative IMR up to 5% of surplus using the type of limitation calculation similar to that used
for goodwill admittance. The guidance should also provide for a downward adjustment if RBC ratio is less than 300.

iv. Review and provide updates on any annual statement instructions for excess withdraws, related bond gains/losses and non-effective hedge gains/losses to clarify that those related gains/losses are through asset valuation reserve (AVR), not IMR.

v. Develop accounting and reporting guidance to require the use of a special surplus (account or line) for net negative IMR.

vi. Develop governance related documentation to ensure sales of bonds are reinvested in other bonds.

vii. Develop a footnote disclosure for quarterly and annual reporting. (Ref #2022-19)

C. Corporate Alternative Minimum Tax (CAMT): Directed NAIC staff to continue work with industry and Working Group members on developing guidance for the reporting of the CAMT for interim Working Group discussion. (Ref #2023-04)

6. Received an update on the following items:

A. Received a referral from the Valuation of Securities (E) Task Force to inquire about the NAIC Securities Valuation Office (SVO) obtaining the ability to calculate analytical information.

B. Announced that copyrighted PDF copies of the AP&P Manual will be made available through Account Manager upon purchase of the 2023 AP&P Bookshelf subscription.

C. Received a request from the American Academy of Actuaries (Academy) for clarification on observed diversity across issuers regarding long-term care (LTC) AAT under Actuarial Guideline LI—The Application of Asset Adequacy Testing to Long-Term Care Insurance Reserves (AG 51) and SSAP No. 54R—Individual and Group Accident and Health Contracts and Appendix A-010, Minimum Reserve Standards for Individual and Group Accident and Health Insurance Contracts.

D. Received an update on international activity as discussed by the International Association of Insurance Supervisors (IAIS) Accounting and Auditing Working Group (AAWG). This discussion noted that public consultations of Insurance Core Principle (ICP) 14: Valuation and ICP 17: Capital Adequacy are expected in July 2023.

E. Received an update on U.S. GAAP exposures, noting that pending items will be addressed during the normal maintenance process.
Virtual Meeting

BLANKS (E) WORKING GROUP
March 7, 2023

Summary Report

The Blanks (E) Working Group met March 7, 2023. During this meeting, the Working Group:

1. Adopted its Nov. 17, 2022, minutes, which included the following action:
   A. Adopted its June 8, 2022, and May 25, 2022, minutes.
   B. Adopted the following proposals:
      i. 2022-12BWG – Combine the Health Analysis of Operations by Lines of Business Supplement page and the Health Care Receivable Supplement pages (Exhibits 3 and 3A) into one supplement filing set for health blank pages filed as a supplement by life/fraternal companies.
      ii. 2022-19BWG Modified – Modify the Life Insurance (State Page) to include the line of business detail reported on the Analysis of Operations by Lines of Business pages. Adds definitions for life and annuity products to the lines of business definitions in the health appendix.
   C. Adopted its editorial listing.
   D. Exposed six new proposals.
   E. Approved language added to the blanks proposal form to address the duplication of reporting.
   F. Reviewed its 2023 proposed charges.
   G. Received a memorandum from the Statutory Accounting Principles (E) Working Group regarding disclosures required as part of Interpretation (INT) 22-02: Third Quarter 2022 Reporting of the Inflation Reduction Act – Corporate Alternative Minimum Tax.
   H. Reviewed State Filing Checklists.

2. Adopted the following proposals:
   A. 2022-14BWG Modified – Modify Exhibit 1, Part 1 and 2, and Exhibit 8, Part 1 and 2, in the life and accident and health/fraternal blank, to include the line of business detail reported on the Analysis of Operations by Lines of Business pages.
   B. 2022-15BWG – In the life, accident and health/fraternal, and property/casualty (P/C) blanks, revise the language of the Schedule H, Part 5 to remove the 5% of premiums filing exemption.
   D. 2022-18BWG – For the life and accident and health/fraternal blank, instructional corrections on the handling of Exchange Traded Funds (ETFs) and/or Securities Valuation Office (SVO) Identified Funds within the Interest Maintenance Reserve (IMR) and the Asset Valuation Reserve (AVR).
   E. 2022-20BWG – Modify the instructions and blanks for various health exhibits to change the order of the Vision and Dental lines of business to be consistent with all other statement types.

3. Adopted its editorial listing.
4. Re-exposed the following proposal:
   A. 2022-17BWG – Add new disclosure paragraph for Note 8 – Derivative Instruments and illustration to new disclosure to be data captured. Add electronic-only columns related to derivatives with excluded components to Schedule DB, Part A and Part B for both Section 1 and Section 2. Add new code column instructions for Schedule DB, Part A and B (SAPWG 2021-20). Re-exposed for a public comment period ending April 28.

5. Exposed nine new proposals for a public comment period ending April 28 for eight of the proposals and June 30 for proposal 2023-06BWG addressing Schedule D, Part 1, reporting.