

Date: 7/22/24

2024 Summer National Meeting Chicago, Illinois

# **CAPITAL ADEQUACY (E) TASK FORCE**

Wednesday, August 14, 2024 1:30 – 2:30 p.m. McCormick Place Convention Center—Grand Ballroom – S100—Level 1

#### **ROLL CALL**

Judith L. French, Chair	Ohio	Grace Arnold	Minnesota
Doug Ommen, Vice Chair	Iowa	Chlora Lindley-Myers	Missouri
Mark Fowler	Alabama	Eric Dunning	Nebraska
Lori K. Wing-Heier	Alaska	Scott Kipper	Nevada
Ricardo Lara	California	D.J. Bettencourt	New Hampshire
Michael Conway	Colorado	Justin Zimmerman	New Jersey
Andrew N. Mais	Connecticut	Mike Causey	North Carolina
Karima M. Woods	District of Columbia	Jon Godfread	North Dakota
Michael Yaworsky	Florida	Glen Mulready	Oklahoma
Ann Gillespie	Illinois	Michael Wise	South Carolina
Amy L. Beard	Indiana	Cassie Brown	Texas
Vicki Schmidt	Kansas	Mike Kreidler	Washington
Sharon P. Clark	Kentucky	Nathan Houdek	Wisconsin
Joy Y. Hatchette	Maryland		

NAIC Support Staff: Eva Yeung

# **AGENDA**

<ol> <li>Consider Adoption of its June 28, April 30, and Spring National Meeting Minutes—Tom Botsko (OH)</li> </ol>	Attachment One Attachment Two Attachment Three
2. Consider Adoption of its Working Group Reports	
A. Health Risk-Based Capital (E) Working Group—Steve Drutz (WA)	Attachment Four
B. Risk-Based Capital Investment Risk and Evaluation (E) Working Group —Philip Barlow (DC)	Attachment Five
C. Life Risk-Based Capital (E) Working Group—Philip Barlow (DC)	Attachment Six
<ul><li>D. Property and Casualty Risk-Based Capital (E) Working Group</li><li>—Tom Botsko (OH)</li></ul>	Attachment Seven
3. Consider Adoption of its Working Agenda— <i>Tom Botsko (OH)</i>	Attachment Eight



4. Consider Exposure of its Revised Procedure Document—*Tom Botsko (OH)* 

Attachment Nine

5. Consider Exposure of its 2025 Proposed Charges—Tom Botsko (OH)

Attachment Ten

6. Discuss and Consider Exposure of the Charges of the New Working Group—*Tom Botsko (OH)* 

Attachment Eleven

- 7. Discuss Any Other Matters Brought Before the Task Force
  —Tom Botsko (OH)
- 8. Adjournment



### NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Virtual Meeting

# **HEALTH RISK-BASED CAPITAL (E) WORKING GROUP**July 25, 2024

#### **Summary Report**

The Health Risk-Based Capital (E) Working Group met July 25, 2024. During this meeting, the Working Group:

- 1. Adopted its June 24, June 6, and April 16 minutes, which included the following action:
  - A. Adopted its Feb. 22 minutes.
  - B. Referred proposal 2024-09-CA to the Capital Adequacy (E) Task Force.
  - C. Heard an update from the American Academy of Actuaries (Academy) on the health care receivables and H2 Underwriting Risk review projects.
  - D. Exposed a referral letter on pandemic risk to the Financial Analysis Solvency Tools (E) Working Group and Financial Examiners Handbook (E) Technical Group.
  - E. Discussed the excessive growth charge.
  - F. Exposed proposal 2024-12-H for a 30-day public comment period ending May 16.
  - G. Exposed proposal 2024-12-H (MOD) for a 14-day public comment period ending June 20.
  - H. Adopted proposal 2024-12-H (MOD) by e-vote June 24.
- 2. Adopted the 2024 health risk-based capital (RBC) newsletter.
- 3. Adopted the 2023 health RBC statistics.
- 4. Received an update from the Academy on the H2 Underwriting Risk review project. Steve Guzski (Academy) discussed the progress and completion timeline of the project. The Working Group offered additional resources as needed for the Academy to complete the project.
- 5. Directed NAIC staff to forward a referral letter on pandemic risk to the Risk-Focused Surveillance (E) Working Group.
- 6. Adopted its 2024 working agenda.

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RISK-BASED CAPITAL INVESTMENT RISK AND EVALUATION (E) WORKING GROUP Wednesday, August 14, 2024 8:00 – 9:00 a.m.

#### **Meeting Summary Report**

The Risk-Based Capital Investment Risk and Evaluation (E) Working Group met Aug. 14, 2024. During this meeting, the Working Group:

- 1. Adopted its Spring National Meeting minutes.
- 2. Adopted its June 21, May 22 and April 12 minutes. During these meetings, the Working Group took the following action:
  - A. Discussed a review of year-end 2023 data reported for residual tranches.
  - B. Heard a presentation from the NAIC's Structured Securities Group.
  - C. Discussed comment letters received on Oliver Wyman's residual tranche risk analysis.
  - D. Discussed comment letters received on a memorandum requesting additional feedback from industry stakeholders to substantiate their request for an additional one-year delay in implementing the 45% risk-based capital (RBC) factor for residual tranches.
  - E. Discussed comment letters received on proposal 2024-19-I and other potential alternative proposals.
  - F. Discussed the American Council of Life Insurers' survey data on residual ownerships by life insurers.
  - G. Voted to retain the original adoption of the 45% charge to be applied to all residuals.
- 3. Received updates from the Valuation of Securities (E) Task Force and the Statutory Accounting Principles (E) Working Group.
- 4. Heard an update from the American Academy of Actuaries on structured securities RBC project.
- 5. Discussed referrals that are related to funds and discussed moving forward in considering RBC formula and instruction changes to reflect SVO-assigned designations in SEC-registered funds as well as to review and consider convergence with exposure aggregations for funds consistently with the Supplemental Investment Risk Interrogatory (SIRI).
- 6. Adopted its 2024 working agenda.

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### LIFE RISK-BASED CAPITAL (E) WORKING GROUP

Wednesday, August 14, 2024 9:00 – 10:00 a.m.

#### **Meeting Summary Report**

The Life Risk-Based Capital (E) Working Group met Aug. 14, 2024. During this meeting, the Working Group:

- 1. Adopted its Spring National Meeting minutes.
- 2. Adopted its June 18 and April 19 minutes. During these meetings, the Working Group took the following action:
  - A. Adopted proposal 2024-15-L to address collateral loans.
  - B. Adopted proposal 2024-17-L to add a factor for omitted Schedule BA mortgages.
  - C. Adopted proposal 2024-04-L to add a line for total adjust capital (TAC) adjustment for non-admitted affiliates.
  - D. Adopted proposal 2024-05-L to add a line to Schedule BA mortgages for omitted asset valuation reserve (AVR).
  - E. Discussed covariance.
  - F. Discussed C-3 risk.
  - G. Discussed proposal 2024-03-L (repurchase agreements).
  - H. Discussed proposal 2024-07-L (other long-term assets).
- 3. Received updates from its subgroups.
  - A. Generator of Economic Scenarios (GOES) (E/A) Subgroup
  - B. Longevity Risk (E/A) Subgroup
  - C. Variable Annuities Capital and Reserve (E/A) Subgroup
- 4. Adopted the 2024 life risk-based capital (RBC) newsletter.
- 5. Adopted its 2023 life RBC statistics.
- 6. Received a referral from the Statutory Accounting Principles (E) Working Group for investments in tax credit structures.
- 7. Discussed the Schedule BA proposal for non-bond debt securities.
- 8. Adopted its working agenda.



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# JOINT MEETING OF THE PROPERTY AND CASUALTY RISK-BASED CAPITAL (E) WORKING GROUP AND CATASTROPHE RISK (E) SUBGROUP

Wednesday, August 14, 2024 10:00 – 11:00 a.m.

# **Meeting Summary Report**

The Property and Casualty Risk-Based Capital (E) Working Group and the Catastrophe Risk (E) Subgroup met Aug. 14, 2024. During this meeting, the Working Group and Subgroup:

- 1. Adopted the Property and Casualty Risk-Based Capital (E) Working Group's June 17 and April 25 minutes. During these meetings, the Working Group took the following action:
  - A. Adopted proposal 2023-14-P (Underwriting Risk Line 1 Factors), which it had exposed for a 30-day public comment period that ended May 25.
  - B. Adopted proposal 2023-17-CR (Climate Scenario Analysis), which it had re-exposed for a 22-day public comment period that ended April 8. However, the Financial Condition (E) Committee adopted proposal 2024-20-CR to replace the 2023-17-CR during its Aug. 2 meeting.
  - C. Adopted proposal 2024-10-P (Other Health Line), which it had exposed for a 30-day public comment period that ended April 16.
  - D. Adopted proposal 2024-11-P (Underwriting Risk Lines 4 & 8 Factors), which it had exposed for a 30-day public comment period that ended April 16.
  - E. Discussed potential modifications in the risk-based capital (RBC) statistics.
  - F. Discussed the study of flood risk in the Catastrophe Risk (E) Subgroup.
  - G. Heard updates from the American Academy of Actuaries (Academy) on its current underwriting risk projects.
- 2. Adopted the Catastrophe Risk (E) Subgroup's June 10 and April 23 minutes. During these meetings, the Subgroup took the following action:
  - A. Adopted proposal 2023-17-CR (Climate Scenario Analysis), which it had re-exposed for a 22-day public comment period that ended April 8.
  - B. Exposed a referral from the Capital Adequacy (E) Task Force regarding the geographic concentration issue.
  - C. Discussed wildfire peril impact analysis.
  - D. Discussed CoreLogic's wildfire model review.
  - E. Discussed the possibility of adding flood period to the Rcat component.
  - F. Heard an update regarding severe convective storm peril.
- 3. Adopted its Spring National Meeting minutes.
- 4. Adopted its 2024 newsletter for adopted proposals to the 2024 property/casualty (P/C) RBC formula.
- 5. Discussed 2023 RBC statistics.



- 6. Discussed their working agenda.
- 7. Discussed the geographic concentration issue.
- 8. Heard updates on the severe convective storm peril.
- 9. Discussed the Wildfire Peril Impact Analysis.
- 10. Discussed the CoreLogic Wildfire Model Review.
- 11. Discussed the possibility of adding flood peril to the Rcat component.
- 12. Discussed how to handle the flood peril with the Florida Commission on Hurricane Projection Loss Methodology (FCHLPM).
- 13. Heard an update from the Academy on current and future research topics.

Priority 1 – High Priority Priority 2 – Medium Priority Priority 3 – Low Priority

# CAPITAL ADEQUACY (E) TASK FORCE WORKING AGENDA ITEMS FOR CALENDAR YEAR 2024

2024#	Owner	2024 Priority	Expected Completion Date	Working Agenda Item	Source	Comments	Date Added to Agenda
				Ongoing Items – Life RBC			
L1	Life RBC WG	Ongoing	Ongoing	Make technical corrections to Life RBC instructions, blank and /or methods to provide for consistent treatment among asset types and among the various components of the RBC calculations for a single asset type.			
L2	Life RBC WG	1	<del>2023</del> - <u>2024</u> or later	Monitor the impact of the changes to the variable annuities reserve framework and risk-based capital (RBC) calculation and determine if additional revisions need to be made.      Develop and recommend appropriate changes including those to improve accuracy and clarity of variable annuity (VA) capital and reserve requirements.	CADTF	Being addressed by the Variable Annuities Capital and Reserve (E/A) Subgroup	
L3	Life RBC WG	1	<del>2023</del> - <u>2024</u> or later	Provide recommendations for the appropriate treatment of longevity risk transfers by the updated longevity factors and consider expanding the scope to include all payout annuities.	New Jersey	Being addressed by the Longevity (E/A) Subgroup	
L4	Life RBC WG	1	<del>2023</del> - <u>2024</u> or later	Monitor the economic scenario governance framework, review material economic scenario generator updates, key economic conditions, and metrics, support the implementation of an economic scenario generator for use in statutory reserve and capital calculations and develop and maintain acceptance criteria		Being addressed by the Generator of Economic Scenarios (GOES) (E/A) Subgroup	
				Carryover Items Currently being Addressed – Life RBC			
L5	Life RBC WG	1	<del>2023</del> <u>2024</u> or later	Update the current C-3 Phase I or C-3 Phase II methodology to include indexed annuities with consideration of contingent deferred annuities as well	AAA		
L6	Life RBC WG	1	<del>2023</del> - <u>2024</u> or later	Review companies at action levels, including previous years, to determine what drivers of the events are and consider whether changes to the RBC statistics are warranted.  Deliberate the relevant weights assigned to various risk components.			
<del>L7</del>	Life RBC WG	1	<del>2023 or later</del>	Work with the Academy on creating guidance for the adopted C-2 mortality treatment for 2023 and next steps.			
				New Items – Life RBC			
<u>L7</u>	<u>Life RBC</u> <u>WG</u>	<u>1</u>	2024 or later	In light of SAPWG INT to permit admittance of negative IMR, SAPWG requested CADTF to consider:  1. The elimination of any admitted net negative IMR from Total Adjusted Capital (TAC).  2. Sensitivity testing with and without negative IMR.	CADTF		
<u>L8</u>	<u>Life RBC</u> <u>WG</u>	<u>1</u>	2024 or later	Develop a structure proposal to reflect the split of the Annual Statement, Schedule D, Part 1 into two schedules pursuant to the SAPWG adopted bond project.	CADTF		
<u>L9</u>	<u>Life RBC</u> <u>WG</u>	<u>1</u>	<u>2024 or</u> <u>later</u>	Consider SAPWG Referral for Investments in Tax Credit Structures	<u>SAPWG</u>		

L10	Life RBC	1	2024 or	Consider possible structural changes to account for reporting changes for collateral loans							
<u>L10</u>	WB	_	later	addressed through instructional changes for 2024 with the adoption of proposal 2024-15-							
			idea.	L							
2024#	Owner	2024 Priority	Expected Completion Date	Working Agenda Item	Source	Comments	Date Added to Agenda				
		<u> </u>	•	Ongoing Items – RBC IR & E							
	Carryover Items Currently being Addressed – RBC IR &E										
IR1	RBC IRE	2	<del>2023</del> <u>2024</u> or later	Supplementary Investment Risks Interrogatories (SIRI)	Referred from CADTF	The Task Force received the referral	1/12/2022				
					Referral from Blackrock and IL DOI	on Oct. 27. This referral will be tabled until the bond factors have been adopted and the TF will conduct a holistic review all investment referrals.	11/19/2020				
IR2	RBC IRE	2	2023-2024 or later	NAIC Designation for Schedule D, Part 2 Section 2 - Common Stocks Equity investments that have an underlying bond characteristic should have a lower RBC charge. Similar to existing guidance for SVO-identified ETFs reported on Schedule D-1, are treated as bonds.	Referred from CADTF Referral from SAPWG 8/13/2018	10/8/19 - Exposed for a 30-day Comment period ending 11/8/2019 3-22-20 - Tabled discussion pending adoption of the bond structure and factors.	1/12/2022 10/11/2018				
IR3	RBC IRE	2	<del>2023</del> _2024_or later	Structured Notes - defined as an investment that is structured to resemble a debt instrument, where the contractual amount of the instrument to be paid at maturity is at risk for other than the failure of the borrower to pay the contractual amount due.  Structured notes reflect derivative instruments (i.e., put option or forward contract) that are wrapped by a debt structure.	Referred from CADTF Referral from SAPWG April 16, 2019	10/8/19 - Exposed for a 30-day Comment period ending 11/8/2019 3-22-20 - Tabled discussion pending adoption of the bond structure and factors.	<b>1/12/2022</b> 8/4/2019				
IR4	RBC IRE	2	<del>2023</del> - <u>2024</u> or later	Comprehensive Fund Review for investments reported on Schedule D Pt 2 Sn2	Referred from CADTF Referral from VOSTF 9/21/2018	Discussed during Spring Mtg. NAIC staff to do analysis. 10/8/19 - Exposed for a 30-day comment period ending 11/8/19 3-22-20 - Tabled discussion pending	<b>1/12/2022</b> 11/16/2018				

						adoption of the bond structure and factors.	
				New Items – RBC IR & E		structure and factors.	
IR5			<del>2023</del> - <u>2024</u> or later	Evaluate the appropriate RBC treatment of Asset-Backed Securities (ABS), including Collateralized Loan Obligations (CLO), collateralized fund obligations (CFOs), or other similar securities carrying similar types of tail risk (Complex Assets).	Request from E Committee, SAPWG, VOSTF	Per the request of E Committee comments were solicited asking if these types of assets should be considered a part of the RBC framework.	1/12/2022
IR6			<del>2023</del> - <u>2024</u> or later	Evaluate the appropriate RBC treatment of Residual Tranches.	Request from E Committee, SAPWG, VOSTF	Per the request of E Committee comments were solicited asking if these types of assets should be considered a part of the RBC framework.	1/12/2022
IR7			2025 or later	Phase 2 Bond analysis - evaluate and develop an approach to map other ABS to current bond factors following the established principles from Phase I where the collateral has an assigned RBC. This project will likely require an outside consultant and the timeline could exceed 2-3 years.	Request from E Committee	Per the request of E Committee comments were solicited requesting the need for outside review.	1/12/2022
IR8	RBC IRE		<del>2023</del> - <u>2024</u> or later	Address the tail risk concerns no captured by reserves for privately structured securities.	Referral from the Macroprudential (E) Working Group		8/11/2022
				New Items – RBC IR & E			
<u>IR9</u>	RBC IRE		2024 or later	Develop a structure proposal to reflect the split of the Annual Statement, Schedule D, Part 1 into two schedules pursuant to the SAPWG adopted bond project for all lines of business.	CADTF		
2024#	Owner	2024 Priority	Expected Completion Date	Working Agenda Item	Source	Comments	Date Added to Agenda
				Ongoing Items – P&C RBC			
P1	Cat Risk SG	1		Continue development of RBC formula revisions to include a risk charge based on catastrophe model output:			
			Year-end 2024 or later	a) Evaluate other catastrophe risks for possible inclusion in the charge - determine whether to recommend developing charges for any additional perils, and which perils or perils those should be.	Referral from the Climate and Resiliency Task	12/2/23 Proposal 2023-15-CR (Convective Storm for Informational	4/26/2021

					Farsa Manuala	Dumpaga Order	
					Force. March	Purposes Only	
					2021	Structure) was	
						exposed for a 60-day	
						comment period at	
						the Joint P/C RBC and	
						Cat Risk SG meeting.	
						03/17/24 Proposal	
						2023-15-CR was	
						adopted by the	
						Subgroup, Working	
						Group, and the Task	
						Force during the	
						Spring National	
						Meeting	
						4/23/24 Proposal	
						2023-17-CR was	
						adopted during April	
						23 interim Cat Risk SG	
						meeting.	
						4/25/24 Proposal was	
						adopted during the	
						April 25 PCRBC WG	
						interim meeting.	
P2	PCRBCWG	1	Ongoing	Review and analyze the P/C RBC charges that have not been reviewed since developed.			3/23/2023
				Carryover Items Currently being Addressed – P&C RBC			
Р3	P&C RBC	1	Year-end	Evaluate a) the current growth risk methodology whether it is adequately reflects both	Referral from	1) Sent a referral to	1/25/2018
	WG		2025 or later	operational risk and underwriting risk; b) the premium and reserve based growth risk	Operational Risk	the Academy on	
				factors either as a stand-alone task or in conjunction with the ongoing underwriting risk	Subgroup	6/14/18 conference	
				factor review with consideration of the operational risk component of excessive growth;	0 1	call.	
				c) whether the application of the growth factors to NET proxies adequately accounts for			
				growth risk that is ceded to reinsures that do not trigger growth risk in their own right.			
				Referral to the Academy:			
				https://naiconline.sharepoint.com/teams/FRSRBC/PRBC/2018%20Calls%			
				<u>20-</u>			
				%20PRBC/PCRBC/06 14/attC01 Growth%20Risk%20Referral%20to%20A			
				cademy.pdf			
P4	P&C RBC	1	2024	Continue working with the Academy to review the methodology and revise the		11/16/23 The	6/10/2019
	WG		Summer	underwriting (Investment Income Adjustment, Loss Concentration, LOB UW risk) charges		Academy provided a	, ==, ====
			Meeting or	in the PRBC formula as appropriate.		presentation on their	
			later			Underwriting Risk	
						Report at the Joint	
						report at the Joint	

					PCRBC And Cat Risk SG	
					meeting.	
					3/17/23 Proposal	
					2024-11-P was	
					exposed for a 30-day	
					public comment	
					period during the	
					Spring National	
					Meeting.	
					4/25/24 Proposal	
					2024-11-P was	
					adopted during the	
					PCRBCWG interim	
P5	DO C DD C	1	2025	Fresh at a the Unident with a Dish Line 4 Feet are in the D/C feet and	meeting.	7/20/2020
P5	P&C RBC	1	2025	Evaluate the Underwriting Risk Line 1 Factors in the P/C formula.		7/30/2020
	WG		Summer			
			Meeting or			
			later			
P6	Cat Risk SG	1	2025 Spring	Quantify the R5 Ex-cat Factors for wildfire peril (for informational purposes only)		3/21/2023
			Meeting	Evaluate the possibility of adding PR018A to determine the R5 including excluding the		
				wildfire peril in additional to earthquake, and hurricane.		
P7	Cat Risk SG	2	2025 Spring	Evaluate the impact of flood peril to the insurance market		3/21/2023
P8	PCRBCWG	1	Meeting 2024 Spring	Adding pet insurance line in the RBC PR017, 018, 035 and RBC Schedule P, parts due to	12/2/23 Proposal	7/27/2023
Γδ	FCKBCVVG	_	Meeting	the adoption of the Annual Statement Blanks proposal 2023-01BWG.	2023-14-P (Pet	7/27/2023
			iviceting	the adoption of the Annual Statement Blanks proposal 2023-016WG.	Insurance) was	
					exposed for a 60-day	
					comment period at	
					the Joint P/C RBC and	
					Cat Risk SG meeting.	
					2/21/24 Proposal	
					2023-01BWG was	
					adopted at the BWG	
					Interim Meeting.	
					3/17/24 Proposal	
					2023-14-P was	
					adopted by the	
					Subgroup, Working	
					Group, and the Task	
					Force during the	
					Spring National	
					Meeting	

ſ	P9	Cat Risk SG	1	2024	Create a new disclosure to collect more information of insurers catastrophe reinsurance	Referral from	11/16/23 Received a	2/20/2024
		Cut Hisk 50	_	Summer	programs.	Reinsurance (E)	referral and proposal	2,20,2021
				Meeting	Referral from Reinsurance (E) Task Force:	Task Force	from RTF.	
					https://naiconline.sharepoint.com/teams/FRSRBC/PRBC/2024%20Calls%20-	Tuon Tuon	12/2/23 Proposal	
					%20Joint/03_17_NM/Att2c_%20Referral%20from%20RTF%20to%20PCRBCWG%20(1).doc		2023-13-CR (Cat Risk	
					$\frac{\sqrt{2}}{2}$		Insurance Program	
							Interrogatory) was	
							exposed for a 60-day	
							comment period at	
							the Joint PCRBC and	
							Cat Risk SG meeting.	
							3/17/24 Proposal	
							2023-13-CR was	
							adopted by the	
							Subgroup, Working	
							Group, and the Task	
							Force during the	
							Spring National Meeting.	
}	D10	DCDDCMC	4	2024	Linder DD040 Line 25 Americal Chaterrant Courses and the Chaterrant Value to exceed			2/20/2024
	P10	PCRBCWG	1	2024 Summer	Update PR019, Line 25 Annual Statement Source and the Statement Value to avoid		3/17/24 Proposal	2/20/2024
					double-counting on Stop-Loss premium.		2024-10-P was	
				Meeting			exposed for a 30-day	
							public comment	
							period during the	
							Spring National	
							Meeting.	
							4/25/24 Proposal was	
							adopted during 4/25	
							PCRBCWG interim	
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	P11	Cat Risk SG	1	2024	Create additional Rcat pages to collect commercial Cat modelers product information	From Solvency	1/29/24 Proposal	1/29/2024
				Summer	known as "Climate Conditioned Catalogs", which would provide an estimate of climate	Workstream of	2023-17-CR was	
				Meeting	change for hurricane and wildfire.	the Climate &	exposed for a 30-day	
						Resiliency (EX)	public comment	
						Task Force	period at the Cat Risk	
							SG Interim Meeting on	
							Jan. 29.	
							<u>3/17/24 Proposal</u>	
							2024-10-P was re-	
							exposed for a 22-day	
							<u>public comment</u>	
							period during the	

					I							
						Spring National						
						Meeting.						
P12	PCRBCWG	1	2024 Spring	Change the RBC Schedule P short-tail lines to vendor link, which will pull directly from the		2/21/24 Blanks						
			Meeting	Annual Statement, Schedule P short-tail lines as the adopted blanks proposal 2023-		Proposal 2023-16BWG						
				16BWG modified the Schedule P short-tail lines to show 10 years of data beginning in		was adopted at the						
				2024.		BWG meeting						
						3/17/24 Proposal						
						2024-01-P was						
						adopted by the						
						Subgroup, Working						
						Group, and the Task						
						Force during the						
						Spring National						
						Meeting.						
	New Items – P&C RBC											
P13 <del>P10</del>	Cat Risk	21	2025 Fall	Consider:		6/10/24 Exposed a	2/20/2024					
<u>- 10</u> . 10	SG <del>PCRBCWG</del>		Meeting <del>2024</del>	1) further investigating all geographic concentration related issues.		referral from the Tas	2,20,202					
	<u>50</u> 1 CHECT C		Summer	possibly modifying the property and casualty (P/C) risk-based capital formulas Update		Force for a 30-day						
			Meeting	PRO19, Line 25 Annual Statement Source and the Statement Value to avoid double-		comment period						
			wiceting	counting on Stop Loss premium.								
				Counting on Stop-Loss premium.		ending July 10.						
2024#	0	2024	Francisco et a el	14/	C	C	D-4-					
2024#	Owner	2024	Expected	Working Agenda Item	Source	Comments	Date					
2024#	Owner	2024 Priority	Completion	Working Agenda Item	Source	Comments	Added to					
2024#	Owner	_			Source	Comments						
		Priority	Completion Date	Ongoing Items – Health RBC			Added to Agenda					
2024 # X1	Health RBC	_	Completion	Ongoing Items – Health RBC  Evaluate the yield of the 6-month U.S. Treasury Bond as of Jan. 1 each year to determine	Source HRBCWG	-Adopted 2022-16-CA	Added to					
		Priority	Completion Date	Ongoing Items – Health RBC  Evaluate the yield of the 6-month U.S. Treasury Bond as of Jan. 1 each year to determine if further modification to the Comprehensive Medical, Medicare Supplement and Dental		-Adopted 2022-16-CA (YE-2023)	Added to Agenda					
	Health RBC	Priority	Completion Date	Ongoing Items – Health RBC  Evaluate the yield of the 6-month U.S. Treasury Bond as of Jan. 1 each year to determine if further modification to the Comprehensive Medical, Medicare Supplement and Dental and Vision underwriting risk factors is required. Any adjustments will be rounded up to		-Adopted 2022-16-CA (YE-2023) Exposed 2024-09-CA	Added to Agenda					
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						to the health formula	
						because of ongoing	
						federal discussions	1/11/2018
						and legislation.	
						Discuss and monitor	
						the development of	
						federal level programs	
						and the potential	
						impact on the HRBC	
						formula.	
	I	l	I.	Carryover Items Currently being Addressed – Health RBC		1011110101	<u> </u>
Х3	Health RBC	2	Year-End	Consider changes for stop-loss insurance or reinsurance.	AAA Report at	(Based on Academy	
	WG		2025 RBC or		Dec. 2006	report expected to be	
	""		Later		Meeting	received at YE-2016)	
			Later		Wiccumg	2016-17-CA	
						Adopted proposal	
						2023-01-CA	
X4	Health RBC	2	<del>Year-end</del>	Review the individual factors for each health care receivables line within the Credit Risk	HRBC WG	Adopted 2016-06-H	
**		±			HKBC WG		
	<del>WG</del>		2025 RBC or	H3 component of the RBC formula.		Rejected 2019-04-H	
			<del>later</del>			Annual Statement	
						Guidance (Year-End	
						2020) and Annual	
						Statement Blanks	
						Proposal (Year-End	
						2021) referred to the	
						Blanks (E) Working	
						Group	
						Adopted 2024-12-H	
						(MOD)	
X5 <u>4</u>	Health RBC	1	Year-end	Work with the Academy to perform a comprehensive review of the H2 - Underwriting Risk	HRBCWG		4/23/2021
	WG		2025 RBC or	component of the health RBC formula including the Managed Care Credit review. (Item			
			later	18 above)			
				Review the Managed Care Credit calculation in the health RBC formula - specifically		Review the Managed	12/3/2018
						Care Category and the	, 0,0
				Category 2a and 2b.		credit calculated, more	
						specifically the credit	
				Review Managed Care Credit across formulas.		calculated when	
				As part of the H2 - Underwriting Risk review, determine if other lines of business should		moving from Category 0 & 1 to 2a and 2b.	
				include investment income and how investment income would be incorporated into the		U & 1 (U Za aliu ZD.	
				existing lines if there are changes to the structure.			
				existing fines it there are changes to the structure.			

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<del>X6</del>	Health RBC WG	<del>1</del>	<del>Year-end</del> <del>2025 or later</del>	Review referral letter from the Operational Risk (E) Subgroup on the excessive growth charge and the development of an Ad Hoc group to charge.	HRBCWG	Review if changes are required to the Health RBC Formula	4/7/2019
X7 <u>5</u>	Health RBC WG	3	Year-End 2025 or later	Discuss and determine the re-evaluation of the bond factors for the 20 designations.	Referral from Investment RBC July/2020	Working Group will use two- and five-year time horizon factors in 2020 impact analysis. Proposal 2021-09-H - Adopted 5/25/21 by the WG	9/11/2020
				New Items – Health RBC			
2024#	Owner	2024 Priority	Expected Completion Date	Working Agenda Item	Source	Comments	Date Added to Agenda
				Ongoing Items – Task Force			
CA1	CADTF	2	2023	Affiliated Investment Subsidiaries Referral Ad Hoc group formed Sept. 2016	Ad Hoc Group	Structural and instructions changes will be exposed by each individual working group for comment in 2022 with an anticipated effective date of 2023. Proposal 2022-09-CA was adopted at the 2022 Summer Meeting. Proposal 2022-09-CA MOD was adopted at the 2023 Spring Meeting. Proposal 2023-12-CA was adopted at the 2023 Fall Meeting. Editorial Proposal 2024-08-CA will be exposed on 3/17/24 for a 30-day public comment, Proposal 2024-08-CA	

				2024 Spring National Meeting. Proposal adopted during 4/30 TF interim meeting.	
CA2		Ongoing	All investment related items referred to the RBC Investment Risk & Evaluation (E) Working Group	Proposal 2024-02-CA (Residual Structure PC & Health) was exposed for comment ending Mar. 2. 3/17/24 – the TF exposed this proposal for a 30-day public comment period. 4/30/24- the RG adopted this structure proposal. 6/28/24-the TF adopted proposal 2024-18-CA to retain 20% charge for the	1/12/2022

						<u>Total Residual</u>	
						<u>Tranches or Interests.</u>	
CA3	CADTF	3	Ongoing	Receivable for Securities factor		Consider evaluating the factor every 3 years. (2024, 2027, 2030 etc.)	
						Factors will be exposed for comments in April 2024. 6/28/24 - the TF adopted proposal 2024-13-CA.	
CA4	CADTE	1	2026 or later	Established the Risk Evaluation Ad Hoc Group to:  a) —Evaluate the RBC factors. b) —Potentially develop an evaluating process. e)a) —Prioritize those factors that require reviewing.		7/26/23 — the Risk Evaluation Ad Hoc Group established 3 Ad Hoc Subgroup to focus on different issues: 1) RBC Purposes & Guidelines Ad Hoc Subgroup; 2) Asset Concentration Ad Hoc Subgroup; and 3) Geographic Concentration Ad Hoc Subgroup.	03/23/2023
CA54	CADTF	<u>1</u>	Ongoing	Update the annual investment income adjustment to the comprehensive medical, medicare supplement, and dental and vision factors.		4/30/24 – the TF exposed proposal 2024-09-CA for a 30- day public comment period. 6/28/24 – the TF adp[ted the proposal.	4/30/2024
<del>CA5</del>	CADTE	<del>2</del>	<del>2024 or later</del>	Evaluate if changes should be made in the RBC formula to reflect the split of the Annual Statement, Schedule D, Part 1 into two sections.  Referral:  SCDPT1	Blanks WG and SAPWG	12/2/23 — the TF agreed to send a referral to the RBCIREWG to continue reviewing this issue.	12/2/2023
<del>CA6</del>	CADTE	2	<del>2024 or later</del>	Evaluate if changes should be made in the RBC formula to reflect the possible changes in the Annual Statement, Schedule BA proposal for non-bond debt securities Referrals:  SCBAPT1	Blanks WG and SAPWG	12/2/23 – the TF received a referral from SAPWG regarding the possible	12/2/2023

Schedule BA Collateral Loan reporting, including structural changes to RBC blanks and forecasting and changes of risk charges that commensurate with underlying collateral type.   Referral from SAPWG   Referral for a 30-day public   Referral for a 30-day public   Referral from SAPWG   Referral from SAPWG   Referral from SAPWG   Referral from SAPWG   Referral for a 30-day public   Referral from SAPWG   Referral fro							Annual Statement reporting for debt securities that do not qualify as bonds on Schedule BA. TF agreed to forward the referral along with the ACLI comment to the RBCIREWG.	
the Life RBC formula to determine whether its possible application to P/C and Health formulas.  Referral from Life Risk-Based Capital (E) Working Group: Att16_2024-06-CA Repurchase Agreements P&C and Health.pdf  Regerments PC & Health was exposed for comment ending Mar.2.  3/17/24 - the TF exposed this referral for a 30-day public comment period.  CA9 CADTF 2 2024 or later Establish a long-term approach for the issue of the negative interest maintenance reserve (IMR) Referrals:  SAPWG 12/2/23 - the TF agreed to forward the referral to LRBCWG.	CA7CA65	CADTF	2		Schedule BA Collateral Loan reporting, including structural changes to RBC blanks and forecasting and changes of risk charges that commensurate with underlying collateral type.  Referral from Statutory Accounting Principles (E) Working Group:  https://naiconline.sharepoint.com/teams/FRSRBC/Capital%20Adequacy%20CapAd%20Ta sk%20Force/ 2024%20Calls/03_17NM/Att14Collateral%20Loan%20Memo%20to%20Multiple%20Group		received a referral from SAPWG regarding collateral loan reporting changes 3/26/24 – the TF exposed this referral for a 45-day public comment period. 6/28/24 – the SAPWG provided updates on	1/23/2024
(IMR) Referrals: contact the properties of the p	CA8CA76	CADTF	2	2024 or later	the Life RBC formula to determine whether its possible application to P/C and Health formulas.  Referral from Life Risk-Based Capital (E) Working Group:	Life RBC WG	1/25/24 – the TF received a referral from LRBCWG. Proposal 2024-06-CA (Repurchase Agreements PC & Health( was exposed for comment ending Mar.2. 3/17/24 – the TF exposed this referral for a 30-day public	1/25/2024
The same in the sa	<del>CA9</del>	CADTE	2	<del>2024 or later</del>	(IMR)	SAPWG	12/2/23 – the TF agreed to forward the	12/2/2023
					Carryover Items Currently being Addressed – Task Force			

				New Items –Task Force			
CA87	CADTE	1	2024 or later	Review the possibility of establishing a new Working Group to evaluate the non- investment risk issues.  a) Review the possibility of removing the TAC and ACL amounts I the annual statement's five-year historical data page.  b) Re-evaluate some of the missing non-investment risks to determine whether the Task Force should include them in the RBC calculation or itf it should appropriately handle those risks utilizing other regulatory methods.  c) Review those non-investment factors and instructions that have not been reviewed since being developed to determine if modifications should be made.			4/30/2024
<u>CA98</u>	CADTF	<u>2</u>	2025 or later	Review the RBC Preamble to determine whether additional modification is required to clarify and emphasize the purposes and intent of using RBC.	RBC Purposes & Guidelines Ad Hoc Subgroup		4/30/2024
<u>CA109</u>	CADTF	<u>2</u>	2025 or later	Evaluate if changes should be made in the RBC formula to reflect the possible changes in the existing low-income housing tax credit investment lines in the RBC formulas to allow the expansion of including any type of state or federal tax credit program,	SAPWG	4/30/24 – the referral was exposed for a 30- day public comment period. 6/28/24 – the SAPWG provided updates on this project.	4/30/2024

#### **Historical Comments:**

## <u>P1:</u>

4/26/21 - The SG exposed the referral for a 30-day period.

6/1/21 - The SG forwarded the response to the Climate and Resiliency Task Force.

2/22/22 - The SG adopted proposal 2021-17-CR (adding the wildfire peril for informational purposes only). The SG continues reviewing other perils for possible inclusion in the Rcat.

8/11/22 – The TF adopted Proposal 2022-04-CR (2013-2021 Wildfire Event Lists)

9/26/22 – The SG formed an ad hoc group to conduct review on severe convective storm models.

7/18/23-The SG is finishing reviewing the following SCS vendor models: RMS, Verisk, KCC, and Corelogic.

12/2/23-Proposal 2023-15-CR (Convective Storm for Informational Purposes Only Structure) was exposed for a 30-day comment period at the Joint P/C RBC and Cat Risk SG meeting.

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#### **CA1:**

- 1. Structural and instructions changes will be exposed by each individual working group for comment in 2022 with an anticipated effective date of 2023.
- 2. Proposal 2022-09-CA MOD was adopted at the 2023 Spring Meeting.
- 3. Proposal 2023-12-CA was adopted at the 2023 Fall Meeting.
- 4. Editorial Proposal 2024-08-CA will be exposed on 3/17/24 for a 30-day public comment.