

2026 Mortality Data Collection Kick-off (Observation Year 2025)

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June 2026

Agenda

- Recap of Previous Mortality Experience Data Collections
- Current Data Collection – Observation Year 2025
- What's New
- Key Points to Remember
- Review Process and Feedback from NAIC
- Common Problems Encountered with Data Files
- Additional Resources Available

Recap of Previous Mortality Experience Data Collections

- The NAIC provided aggregate data files to the Society of Actuaries for observation years 2020-2023. These observation years are now considered to be closed and no new submissions will be accepted.
- NAIC staff is currently working with companies to complete submissions for observation year 2024.
 - The RDC data call for 2024 will remain open as long as necessary to accommodate resubmissions.

Current Data Collection

Observation Year 2025

- An email was sent recently to confirm the company contacts and their access to RDC and SharePoint.
- The data collection will begin in early July 2026. A blast email will be sent to all participating companies when RDC is opened for this year's collection.
- The due date for initial company data submissions is September 30, 2026.
- There will be a fee of \$12,500 for this year's data collection. Invoices will be sent out for this fee later this year.

What's New

New plan code for coverages issued as a result of exercising a Guaranteed Insurability Option

- Last year we provided guidance regarding coverages that were issued as a result of exercising a guaranteed insurability option.
 - The SOA confirmed that these coverages should be included.
 - They should be coded with the same issue date, issue age, and underwriting type as the base coverages.
- A recent *Valuation Manual* amendment has identified a new plan code to be used for these coverages. This amendment is expected to be adopted for the 2027 *Valuation Manual*.
- We are asking companies to incorporate this plan code in 2026 on a voluntary basis.

Coverage Purchased Under A Guaranteed Insurability Option:

110 – Exercised Guaranteed Insurability Option

What's New

Increased Involvement By Appointed Actuaries and Regulators

- In order to keep the data collection moving forward at a steady pace, NAIC staff began including due dates for responses when providing our validation feedback.
- While many companies have responded by the due date, some have required repeated reminders regarding their response (either resubmission or A/E signoff).
- Beginning with this year's data collection, if a company misses deadlines, then the appointed actuary for the company will be included in additional communications.
- Regulators have reached out to the NAIC and told us that they want to be more involved with companies that are having problems submitting acceptable data files.
 - If a company continues to be unresponsive, then their domestic regulator will be included on future communications.

Key Points to Remember

Data File Submissions

- Data files must be submitted using the Regulatory Data Collection (RDC) tool found on the NAIC website.
 - If your data does not contain any exceptions, the status will change to “File Processed.” From that point the file will automatically flow into our review process.
 - If there are data exceptions in your file, the status will change to “Pending User Submission.” If you want to submit this file, you will need to click the “Submit” button in order for your file to move into the review stage. NAIC staff is unable to access your data file until you do this.

Key Points to Remember

Additional Required Documents – VM-51 Appendices

- VM-51 Appendix 1: Preferred Class Structure Questionnaire.
- VM-51 Appendix 2: Mortality Claims Questionnaire
- VM-51 Appendix 3: Additional Plan Code Form (only required if the company is using custom plan codes).
 - Appendix 1 & 2 Questionnaires are required to be submitted once each year by all companies. Appendix 3 is required once each year if the company is using custom plan codes.
 - These must be uploaded to the company's SharePoint folder for the current observation year.
 - Templates for these documents are available on the NAIC website and on the Home page of the SharePoint Site.

Key Points to Remember

Additional Required Documents – Control Totals and Reconciliation

- Control Totals (Required by VM-50 Section 4.B.2)
- Reconciliation to the Annual Statement (Required by VM-50 Section 4.B.3)
 - Each of these documents are required to be submitted with each data file submission.
 - These must be uploaded to the company's SharePoint folder for the current observation year and submission date.
 - Templates for these documents are available on the NAIC website and on the Home page of the SharePoint Site.

Review Process and Feedback from NAIC

- As in the past, the NAIC will perform validation checks and provide feedback packages for the company's review. The validation checks consist of both rules-based validations and a trend review of key data elements.
- When the feedback package is uploaded to the company's SharePoint folder, an email will be sent to the company. This email will highlight the major areas of concern identified during the review of the company's data file. The email will also identify a due date for the company's response.
- Companies are required to respond to critical validation exceptions and any questions posed by NAIC staff in the trend spreadsheet.
- If a company needs more time to review the feedback and prepare a response (resubmission, response to questions, or A/E signoff), please notify the NAIC and we will work with you to assign a new due date.

Common Problems Encountered with Data Files

- The company does not click the “Submit” button in RDC when data exceptions are identified. NAIC staff are unable to process your data file until you click the button.
- Segment numbers not consistent with the previous year’s data file. In order for year over year validations to be performed, the segment numbers must remain consistent.
 - The only exception to this rule are policies that go on Reduced Paid Up or Extended Term. In those cases, the new coverage should be in segment 1 as an active coverage. The previous coverage (if available) should be coded with a later segment number (we recommend using 101) and should be coded as terminated.

Common Problems Encountered with Data Files

- Dropping leading zeros. Certain fields are identified in VM-51 Appendix 4 with a list of valid values that may contain leading zeros. For example, if a record was underwritten and fluid was collected, the Type of Underwriting Requirements field must be coded as “03” and not just “3.”
 - Fields requiring leading zeros are: Type of Underwriting Requirements, Plan, Cause of Termination (if inforce indicator is 0), Premium Mode, ULSG/VLSG Premium Type*, Type of Secondary Guarantee*, Operative Secondary Guarantee at the Beginning of Observation Year*, Operative Secondary Guarantee at the End of Observation Year*.

*Please note these fields are only to be populated if the record is identified as either a ULSG or VLSG product via the plan field.

Additional Resources Available

- Prior Year's Training Webinars (recordings and slide decks)
- RDC Submission Instructions
- Company Administrator Guide
- Templates for Control Totals, Reconciliation, and VM-51 Appendix Questionnaires
- VM-51 Data Validations
- Data Dictionary
- Submission Checklist

Additional Resources Available Online

- The NAIC website (https://content.naic.org/pbr_data.htm scroll to the VM-50/VM-51 Experience Reporting section)

VM-50 / VM-51

Experience Reporting

For Questions Please Contact: experience_reporting@naic.org

2026 Data Collection Training / Resources (2025 Observation Year)

2025 Data Collection Training / Resources (2024 Observation Year)

Additional Resources

Additional Resources Available Online

- The SharePoint Home page in the Documents Library.

The screenshot displays a SharePoint site for 'NAIC Mortality Experience Data Collection'. The left-hand navigation pane includes 'Home', 'Documents' (circled in blue), and 'Company Folders'. The main content area features a 'Documents' library with a '+ New' button, 'Upload', 'Edit in grid view', and 'Export' options. Below these are four folders: 'General Resources', 'Observation Year 2025', 'Observation Year 2024', and 'Observation Years 2022 & 2023'. The background of the slide features a large, faint watermark of the NAIC logo with the year '1871' and the text 'NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS'.

Questions?

If you have any questions regarding this year's data collection, please email experience_reporting@naic.org

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