

Questions to Determine Objectives of NAIC Climate Disclosures

The following questions have been developed by the Climate Disclosure Workstream of the NAIC Climate Risk and Resilience Task Force. The questions were developed with substantial feedback from interested regulators and parties. They are designed to gain a solid foundation of the goals of climate disclosures. The responses will guide discussions on how the current climate disclosure framework should be revised to be more effective.

- 1) Who is/are the audience(s) and what do they wish to glean from the results (solvency regulation, risk evaluation, etc.)?
 - a) What qualitative and quantitative metrics do they need?
 - b) How should the information in the survey be formatted to be useful?
 - c) What information not already being provided in the survey would be useful?
- 2) Who should report?
 - a) What is the threshold?
 - b) Should it be compulsory?
- 3) What report framework should be used?
 - a) TCFD?
 - b) NAIC Climate Disclosure Survey?
 - c) Another framework (such as CDP)?
 - d) Some combination?
- 4) How should the questions be designed?
 - a) Multiple choice?
 - b) Open-ended?
 - c) Close-ended (rating scale, dropdown, ranking, etc.)?
 - d) Should insurers be able to respond to narrative responses by referencing an attachment or linked disclosure (such as TCFD)?
 - e) Should questions be tailored to size of company or logic added to meet companies where they are?
- 5) How should a transition from the current survey to a successor be managed?
 - a) What should be the effective date of the changes?
 - b) What should be the timing of information reported?
- 6) Where should climate disclosures be reported?
 - a) Continue to make it available through California's website?
 - b) Build an NAIC repository?
 - c) Directed to the domestic state?
- 7) How should the results be made available?

- a) Only to regulators?
 - b) Publicly available (as it is today)?
 - c) Combination of public and regulator-only? If so, how should the disclosure information be separated?
- 8) What can be done to help companies recognize climate-related risks and how they should be disclosed.
- 9) What support is necessary to assist companies in filling out the survey?