



GAINCOMPLIANCE

Statutory Reporting & Accounting Update: Property/Casualty & Health

December 2, 2025

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Agenda

- 2025 Statement Reporting/Accounting
- 2025 Risk-Based Capital (RBC)
- Other Accounting Updates
- Investment Analysis Office
- Valuation of Securities Task Force Reorganization
- Blanks Working Group Update



2025 Reporting/Accounting

Good News!!

- ▶ It's all FREE* this year
 - ▶ *Accounting Practices and Procedures Manual*
 - ▶ And it is a searchable PDF!
 - ▶ *Annual Statement Blanks*
 - ▶ *Annual Statement Instructions*
 - ▶ *RBC Forecasting and Instructions*
 - ▶ Just released November 5, 2025
 - ▶ *2026 Quarterly Instructions & Blanks*
 - ▶ Just released November 5, 2025



Most 2025 Reporting Changes Result from the Bond Project (PBBD)

But Not All

All Statements

- ▶ **Jurat Page**
 - ▶ Information for company guaranty association assessment (electronic only)
 - ▶ Name, address, telephone number, email address
 - ▶ Person responsible for managing and paying assessments



General Interrogatories

► Question #31

31. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

| | 1 Statement (Admitted) Value | 2 Fair Value | 3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+) |
|--------------------------------|------------------------------------|-----------------|---|
| 31.1 Issuer Credit Obligations | | | |
| 31.2 Asset-Backed Securities | | | |
| 31.3 Preferred Stocks | | | |
| 31.4 Totals | | | |



Notes to Financials

- ▶ Many notes have instructional reference changes to accommodate new bond reporting categories and subcategories
- ▶ Some notes have new format splitting out ICOs and ABS
- ▶ **Note 5K** - Investments in tax credit structures (SSAP No. 93)
 - ▶ Nature of use, amount recognized, present balance, amortization, schedule of credits expected annually, commitment or contingent commitment, impairment
 - ▶ Disclosure of credits allocated from tax credit investments and unused as of reporting period moved to Note 21 (SSAP No. 94 - *State and Federal Tax Credits*)



Notes to Financials

- ▶ Note 5L - Restricted Assets)
 - ▶ Extensive new disclosure of assets held under modified coinsurance (modco) or funds withheld (FWH) reinsurance agreements
 - ▶ Both ceded and assumed assets
 - ▶ From revisions to *SSAP No. 1*
 - ▶ Includes ALL restricted assets reported on the financial statements
 - ▶ Including from *SSAP No. 1*, paragraphs 23.b and 23.c for a comparison to total assets
 - ▶ Consequently, may not tie to corresponding general interrogatories since items captured in paragraph 23.c require a corresponding liability and therefore are not captured in the general interrogatory nor as a noncontrolled asset in RBC
 - ▶ Some parts have different formats for the different statements
 - ▶ But basically asks for same information
 - ▶ All of 5L will be required Note for quarterly beginning 2026



Notes to Financials

► Note 5L(1) - Restricted Assets - P/C Version

| Restricted Asset Category | 8 Total Nonadmitted Restricted | 9 Total Admitted Restricted (5 minus 8) | Current Year | | | | 14 GI Ref | |
|---------------------------|--------------------------------------|--|--|---|--|--------------------------------------|--------------|--|
| | | | Percentage | | 12 Amount Reported in General Interrogatories | 13 Difference from Note and GI | | |
| | | | 10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c) | 11 Admitted Restricted to Total Admitted Assets (d) | | | | |

- Column 14 - NAIC provides the general interrogatory reference for each reporting line (where appropriate)
- New reporting lines



| | | | |
|--|--|--|--|
| o. Collateral Assets Received and on Balance Sheet | | | |
| p. Assets held under <u>Modco</u> Reinsurance Agreements | | | |
| q. Assets held under Funds Withheld Reinsurance | | | |

| |
|-------------|
| 25.04+25.05 |
| 26.21 |
| 26.22 |
| 26.23 |
| 26.24 |
| 26.25 |
| 26.26 |

Excludes collateral under security lending & repurchase agreements reported on balance sheet



Notes to Financials

- ▶ Note 5L(1) - Restricted Assets - P/C Version
 - ▶ Explain differences between Note 5L(1) and the general interrogatories

| GI Reference | Difference between Note and GI (Per Column 12 above) | Explanation |
|--------------------|---|-------------|
| <u>25.04+25.05</u> | | |
| 26.21 | | |
| 26.22 | | |
| 26.23 | | |
| 26.24 | | |
| <u>26.25</u> | | |
| 26.26 | | |
| 26.27 | | |
| <u>26.28</u> | | |
| 26.29 | | |
| 26.31 | | |
| <u>26.30</u> | | |
| 26.32 | | |



Notes to Financials

- ▶ Note 5L(2) - Restricted Assets - P/C Version
 - ▶ Assets pledged as collateral not captured in other categories (excluding Modco/FWH)
 - ▶ Amounts pledged under derivative contracts to agree with Schedule DB

| Description of Assets | Gross (Admitted & Nonadmitted) Restricted | | | | | 6 | 7 | 8 | Percentage | | | | |
|---|---|--|--|---|------------------|-----------------------|----------------------------------|--|---|--|--|--|--|
| | Current Year | | | | | | | | Total Current Year Admitted Restricted | 9 | | | |
| | 1 | 2 | 3 | 4 | 5 | | | | | | | | |
| Total General Account (G/A) | \$ | G/A Supporting Protected Cell Account Activity (a) | Total Protected Cell Account Restricted Assets | Protected Cell Account Assets Supporting G/A Activity (b) | Total (1 plus 3) | Total From Prior Year | Increase/ (Decrease) (5 minus 6) | Total Current Year Admitted Restricted | Gross (Admitted & Nonadmitted) Restricted to Total Assets | Admitted Restricted to Total Admitted Assets | | | |
| | \$ | | \$ | \$ | \$ | \$ | \$ | \$ | % | % | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| Total (c) | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | % | % | | | |
| Amount of Total pledged under derivative contracts | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | % | % | | | |
| Total Excluding Derivative Collateral (Total minus Amt of Total pledged under derivative contracts) | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | XXX | XXX | | | |



Notes to Financials

Reflected as Assets within the Reporting Entity's financial statements

| Assets | 1 BACV Collateral *** | 2 BACV Modco **** | 3 BACV FWH ***** | 4 Fair Value Collateral | 5 Fair Value Modco | 6 Fair Value FWH | 7 % of BACV to Total Assets (Admitted and Nonadmitted) * | 8 % of BACV to Total Admitted Assets ** |
|--|--------------------------------|----------------------------|---------------------------|----------------------------------|-----------------------------|---------------------------|--|---|
| General Account: | | | | | | | | |
| a. Cash, Cash Equivalents and Short-Term Investments | \$ | \$ | \$ | \$ | \$ | \$ |% |% |
| b. Schedule D, Part 1, Section 1 | | | | | | |% |% |
| c. Schedule D, Part 1, Section 2 | | | | | | |% |% |
| d. Schedule D, Part 2, Section 1 | | | | | | |% |% |

Footnotes provide tie-ins to Assets page, Note 5L(1)

| Assets | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
|--|---|--------------------|----------|----------|----------|----------|----------|
| | Book/Adjusted Carrying Value (BACV) | Related Party Code | | | | | |
| | FWH Including Modco | 1 | 2 | 3 | 4 | 5 | 6 |
| General Account: | | | | | | | |
| a. Cash, Cash Equivalents and Short-Term Investments | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
| b. Schedule D, Part 1, Section 1 | | | | | | | |
| c. Schedule D, Part 1, Section 2 | | | | | | | |
| d. Schedule D, Part 2, Section 1 | | | | | | | |
| e. Schedule D, Part 2, Section 2 | | | | | | | |

- ▶ Note 5L(4) - Restricted Assets - P/C Version
 - ▶ Collateral received and assets held under Modco/FWH reinsurance agreements reflected as assets within the reporting entity's financial Statements
 - ▶ Separate reporting for general/protected cell/ separate accts



Notes to Financials

► Note 5L(4) - Restricted Assets - P/C Version

| | 1 Amount | 2 % of Liability to Total Liabilities ^{*#} |
|--|-------------|---|
| <u>u</u> y. Recognized Obligation to Return Collateral Asset (General Account) | \$ | % |
| <u>v</u> z. Recognized Obligation to Return Collateral Asset (Protected Cell) | \$ | % |
| <u>aa</u> . Recognized Obligation for Modco assets (General Account) | \$ | % |
| <u>bb</u> . Recognized Obligation for Modco assets (Protected Cell) | \$ | % |
| <u>cc</u> . Recognized Obligation for FWH (excluding Modco) assets (General Account) | \$ | % |
| <u>dd</u> . Recognized Obligation for FWH (excluding Modco) assets (Protected Cell) | \$ | % |

^{*#} uy + aa + cc = Column 1 divided by Liability Page, Line 26 (Column 1)

vz + bb + dd = Column 1 divided by Liability Page, Line 27 (Column 1)



Notes to Financials

- ▶ Note 5L(5) - Restricted Assets - P/C Version
 - ▶ Assets held under Modco or FWH agreements also pledged for another purpose specific to the insurance reporting entity (not for the benefit of the reinsurer)

| | Collateral Held | <u>Modco</u> | FWH |
|---|-----------------|--------------|-----|
| a. Securities Lending | | | |
| b. Repo / <u>repurchase</u> Agreements | | | |
| c. Placed under option contracts | | | |
| d. <u>On</u> deposit with states | | | |
| e. On deposit with other regulatory bodies | | | |
| f. Pledged as collateral to FHLB (including assets backing funding agreements | | | |
| g. Pledged as collateral not captured in other categories | | | |
| Total | | | |



Notes to Financials

- ▶ **Note 8 - Derivatives**
 - ▶ Clarification of terminology used for derivative financing premium
 - ▶ Identify where cash flows associated with derivatives are reported in cash flow statement
- ▶ **Note 9B - Income Taxes**
 - ▶ Deletes cumulative temporary differences disclosure



Notes to Financials

- ▶ Note 11 - Debt
 - ▶ New section 11C providing information for unused commitments for and lines of credit financing arrangements
 - ▶ Review carefully for definition of unused commitments and lines of credit

| | Current Year | | Prior Year | |
|--|--------------------|------------------------|--------------------|------------------------|
| | Unused Commitments | Unused Lines Of Credit | Unused Commitments | Unused Lines Of Credit |
| Short-Term (contracts terminating in 12 months or less) | \$ | \$ | \$ | \$ |
| Long-Term (contracts terminating in more than 12 months) | \$ | \$ | \$ | \$ |
| Total | \$ | \$ | \$ | \$ |



Notes to Financials

- ▶ Note 13K - Surplus Notes
 - ▶ Slightly updated disclosure via revisions to SSAP No. 41
 - ▶ Only insurer-issued notes qualify as surplus notes
- ▶ New definitions of surplus and capital notes in SSAP No. 41
 - ▶ Definition of surplus note added, “that qualifies as a surplus note pursuant to SSAP No. 41”
 - ▶ Capital Notes - Held debt securities that do not qualify as issued surplus notes pursuant to SSAP No. 41, that are treated as regulatory capital by the issuer’s primary regulatory authority & do not qualify under the principles-based bond definition solely because interest can be cancelled in the event of financial stress in a non-resolution scenarios without triggering an event of default



Notes to Financials

- ▶ Note #14A - Contingent Commitments
 - ▶ Include any commitment to purchase tax credits (SSAP No. 94)
- ▶ Note #21E - State and Federal Tax Credits
 - ▶ Addition of unused tax credits disclosure & commitment or contingent commitment to purchase tax credits (SSAPs No. 93 & 94)
 - ▶ Partially data captured

Note 21E(1)- Carrying value of state & federal tax credits, disaggregated by transferable/certificated and non-transferable, gross of related tax liabilities by jurisdiction and in total

| Description of State Transferable and Non-transferable Tax Credits | State Jurisdiction | Carry Value | Unused Amount |
|--|--------------------|-------------|---------------|
| | | | |
| | | | |
| | | | |



Notes to Financials

► Note #21E - State and Federal Tax Credits (cont'd)

Note 21E(2)-Total unused tax credits by jurisdiction, disaggregated by transferable/certified and non-transferable

| | State Abbreviation | Transferable/ Certified | Nontransferable | Total |
|------------|--------------------|----------------------------|-----------------|-------|
| a. State | | | | |
| | | | | |
| | | | | |
| b. Federal | XXX | | | |
| | XXX | | | |

Note 21E(3)-Method of estimating utilization of remaining state and federal tax credits

Note 21E(4)-Amount of impairment loss (if any)



Notes to Financials

► Note #21E - State and Federal Tax Credits (cont'd)

Note 21E(5)- State and federal tax credits admitted and nonadmitted, disaggregated by transferable/certificated and non-transferable

| | Total Admitted | Total <u>Nonadmitted</u> |
|----------------------|----------------|--------------------------|
| a. State | | |
| 1. Transferrable | | |
| 2. Non-transferrable | | |
| b. Federal | | |
| 1. Transferrable | | |
| 2. Non-transferrable | | |



Notes to Financials

- ▶ Note #28 - Health Care Receivables
 - ▶ Adds information on Medicare Part D Prescription Payment Plans
 - ▶ Amounts included in other health care receivables which are recoverable from participants in Medicare Part D Prescription Payment plan for the current reporting period \$_____
 - ▶ Aging of receivables

| 1 Name of Plan | 2 Current Period Gross* | 3 1 - 30 Days | 4 31 - 60 Days | 5 61 - 90 Days | 6 Over 90 Days | 7 Nonadmitted | 8 Admitted |
|---|----------------------------------|------------------|-------------------|-------------------|-------------------|------------------|---------------|
| Medicare Prescription Payment Plan Recoverables .. | | | | | | | |

- ▶ Incurred claims expenses include write-offs of impaired Medicare Prescription Payment Plan receivables of \$_____ for (CY) and \$_____ for (PY).



Notes to Financials

- ▶ Note #28 - Health Care Receivables
 - ▶ *INT 24-02T* contains accounting guidance for these plans
 - ▶ Recoverables accrued & reported as asset “health care and other amounts receivable”
 - ▶ Payment made to pharmacy and then billed to Plan participant
 - ▶ Payment to pharmacy is consider a claims expense, recoverable is a contra-claim expense
 - ▶ Recoverables are from Plan participants, NOT from pharmacy
 - ▶ Subject to 90-day overdue assessment, nonadmission & impairment analysis
 - ▶ Write-offs reported as claim expenses; different than CMS treatment
 - ▶ Administration expense of Plan **NOT** included in claim expenses, or claim adjustment expenses (CAE)



Investment Schedules

- ▶ Many, many editorial changes have been made since the original adoption of investment schedules revisions
 - ▶ **EDITORIAL REVISIONS ARE NOT ALL NONSUBSTANTIVE**
 - ▶ Review posted editorial changes carefully



Investment Schedules

- ▶ NAIC does not expect prior year information to be restated for new bond classifications
 - ▶ Some schedules are so marked, or instructions state, but NAIC may have missed something here or there
 - ▶ PBBD is prospective only --- not retrospective
 - ▶ Includes affected General Interrogatories and Notes to Financials
 - ▶ As far as NAIC concerned, also applies to audited financials

| NAIC Designation | 1 Year or Less | | | | 9 Total from Col. 7 Prior Year | 10 % From Col. 8 Prior Year |
|--|----------------------|-------|-------|-------|---|--------------------------------------|
| 6. Project Finance Bonds Issued by Operating Entities (Unaffiliated) | | | | | | |
| 6.1 NAIC 1 | | | | | XXX XXX XXX XXX XXX | XXX XXX XXX XXX XXX |
| 6.2 NAIC 2 | | | | | | |
| 6.3 NAIC 3 | | | | | | |
| 6.4 NAIC 4 | | | | | | |
| 6.5 NAIC 5 | | | | | | |
| 6.6 NAIC 6 | | | | | | |
| 6.7 Totals | | | | | XXX | XXX |

Sch D - Pt1A now only
1 part with 55
sections

Columns not XXX'd out
in Section 53, PY bonds



Schedule D - Verification Between Years

| | 1 Total | 2 Issuer Credit Obligations | 3 Asset-Backed Securities | 4 Preferred Stock | 5 Common Stock |
|--|------------|-----------------------------------|---------------------------------|----------------------|-------------------|
| 1. Book/adjusted carrying value, December 31 of prior year..... | | | | | |
| 2. Cost of bonds and stocks acquired, Part 3, Column 6 | | | | | |
| 3. Accrual of discount..... | | | | | XXX |
| 4. Unrealized valuation increase/(decrease) | | | | | |
| 5. Total gain (loss) on disposals, Part 4, Column 18 | | | | | |
| 6. Consideration for bonds and stocks disposed, Part 4, Column 6 | | | | | |
| 7. Amortization of premium..... | | | | | XXX |
| 8. Total foreign exchange change in book/adjusted carrying value | | | | | |
| 9. Current year's other-than-temporary impairment recognized | | | | | |
| 10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees, Note 5Q, Line 2 | | | | | XXX |
| 11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10) | | | | | |
| 12. Total <u>nonadmitted</u> amounts | | | | | |
| 13. Statement value at end of current period (Line 11 minus Line 12)..... | | | | | |



Schedule D - Summary by Country

- ▶ No changes to the Columns

| Description | | 1 Book/Adjusted Carrying Value | 2 Fair Value | 3 <u>Actual</u> Cost | 4 Par Value of Bonds |
|---|--|--------------------------------------|--------------------|----------------------------|----------------------------|
| BONDS | | | | | |
| Issuer Credit Obligations | | | | | |
| | 1. United States | | | | |
| | 2. Canada..... | | | | |
| | 3. Other Countries | | | | |
| | 4. Total | | | | |
| | 5. United States | | | | |
| | 6. Canada..... | | | | |
| | 7. Other Countries | | | | |
| | 8. Total | | | | |
| All Other Issuer Credit Obligations (affiliated) | 9. Total | | | | |
| Asset-Backed Securities | | | | | |
| | 10. Total Issuer Credit Obligations | | | | |
| | 11. United States | | | | |
| | 12. Canada..... | | | | |
| | 13. Other Countries | | | | |
| | 14. Total | | | | |
| Asset-Backed Securities (affiliated) | 15. Total | | | | |
| | 16. Total Asset-Backed Securities | | | | |
| | 17. Total Bonds | | | | |



Investment Schedules

- ▶ LEI column removed from all except Schedule DB
 - ▶ Also removed from General Interrogatory 17.6
- ▶ Capital structure column removed from D-1-1 and D-1-2
- ▶ ‘Restricted Code’ column replaces ‘Code’ column
- ▶ Some columns moved from the ‘printed’ schedule to the electronic only reporting
 - ▶ For example, the foreign code
 - ▶ Previous electronic column order rearranged



Investment Schedules

- ▶ Dates when transferring from Schedule D to Schedule BA
 - ▶ Disposal on Schedule D - Part 4 - 1/1/2025
 - ▶ Acquisition on Schedule BA - Part 2 - 1/1/2025
 - ▶ **HOWEVER**, Date of Original Acquisition column on Schedule BA - Part 1 should show the same date as was shown on Schedule D
- ▶ Cash Flow
 - ▶ Will need to disclose transfer from Schedule D to Schedule BA as non-cash transaction



Interest Income Due & Accrued

- ▶ Schedule D - Part 1
 - ▶ Report gross amount due - not just admitted amount
- ▶ Schedule DA - Part 1
 - ▶ Columnar heading changed to “Interest Income Due and Accrued December 31 of Current Year”
 - ▶ Report gross amount due - not just admitted amount
- ▶ Aggregate amount of due & accrued investment income from all schedules may no longer directly tie to asset page reporting



Investment Schedules

- ▶ Schedule D - Part 1 - Section 1 (ICOs)
 - ▶ Bonds Issued by Funds Representing Operating Entities
 - ▶ Replaces original category of Bonds Issued from SEC Registered Business Development Corps; Closed-End Funds & REITs
 - ▶ Editorial changes
 - ▶ Schedule D - Part 1 - Section 1 (ICOs)
 - ▶ Call Date
 - ▶ Call Date - Make Whole Call Provision
 - ▶ Now two separate columns



Investment Schedules

- ▶ Schedule D - Parts 3 & 4
 - ▶ Disposals and reacquisitions
 - ▶ Security sold to SPV or other entity and then reacquired from the SPV/entity where original security is combined with derivative or other components (such as a credit repack note) reported as disposal and acquisition
 - ▶ Clarification came from SSAP, but did not result in an accounting revision



Investment Schedules

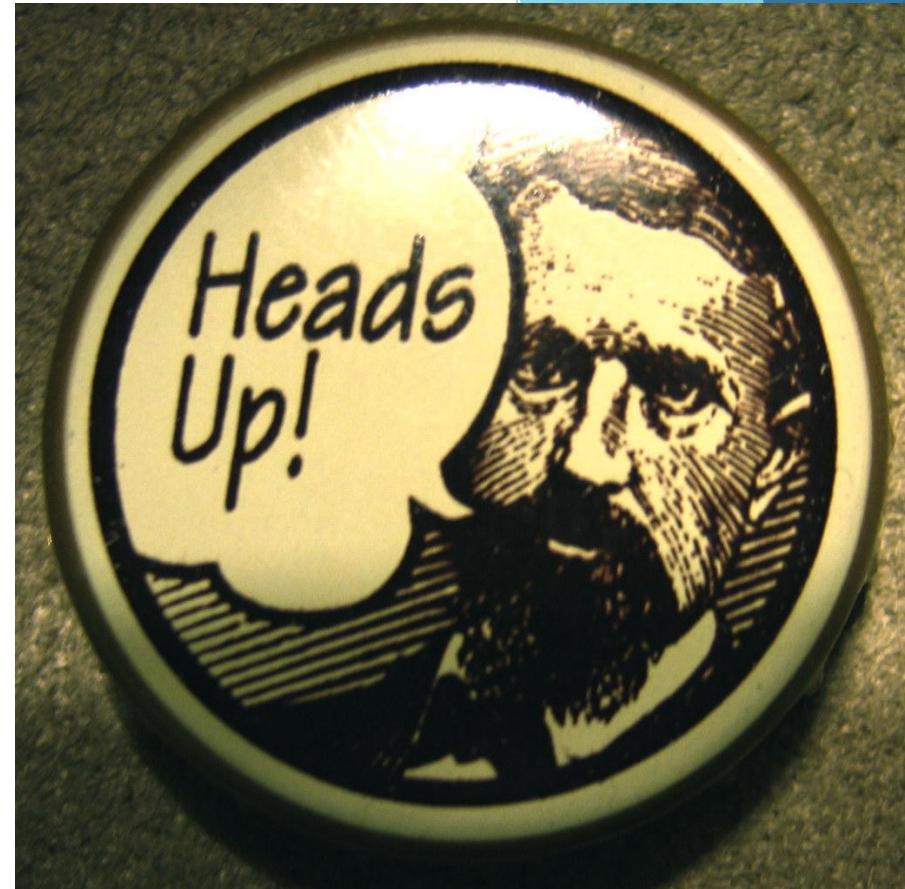
- ▶ Schedule BA
 - ▶ All Schedule BA categories now divided into unaffiliated & affiliated subcategories
 - ▶ New reporting for debt securities not qualifying as bonds
 - ▶ By reason not a bond
 - ▶ New reporting for Tax Credit Structures
 - ▶ Must now be reported on Schedule BA not Schedule D



Investment Schedules

- Schedule BA heads up!
 - Beginning 1/1/2026, expanded reporting for collateral loans
 - Includes expanded collateral loan reporting in AVR

Reviewing 2024 filing, NAIC found that insurers with loans that are not backed by qualifying collateral are admitting the collateral loan. This should only happen with a permitted or prescribed practice.



Investment Schedules

- ▶ Schedule BA RBC affects
 - ▶ P/C and Health RBC do not currently use a “look-through” for Schedule BA assets
 - ▶ All BA assets get the same RBC treatment
 - ▶ Considering revisions for the future - but not this year

Investment Schedules

- ▶ Schedule E - Part 2
 - ▶ Removed SVO Bond ETF lines and instructions
 - ▶ No longer to be included in this schedule
 - ▶ Removed footnote regarding joint ventures and transportation equipment
 - ▶ No longer to be reported in this schedule



Cash Equivalents & Short-Term Investments

Under SSAP No. 2, following do **NOT** qualify regardless of maturity date at purchase

- ▶ Certificates of Deposit
- ▶ Certain related party or affiliated investments
- ▶ Derivative instruments
- ▶ Securities that are reset at predefined dates
- ▶ Mortgage loans captured under SSAP No. 37
- ▶ All asset-backed securities (ABS)
- ▶ All Schedule BA-type investments including
 - ▶ Working Capital Finance Notes
 - ▶ Surplus/Capital Notes
 - ▶ And more



Supplements

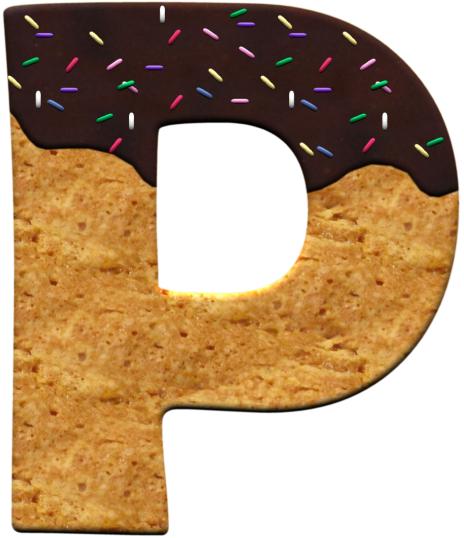
- ▶ Supplemental Health Care Exhibit
 - ▶ Removal of ACA disclosure for transitional reinsurance and risk corridors program from Part 1
 - ▶ New footnote for reporting premium deficiency reserves included in Part 2

(a) Column 13, Line 1.1 includes direct written premium of \$..... for stand-alone dental and \$..... for stand-alone vision policies

(b) Premium Deficiency Reserves included in Column 13, Line 2.19 \$.....

- ▶ Market Conduct Annual Statement Premium Exhibit
 - ▶ Line added for reporting pet insurance
 - ▶ According to NAIC many companies indicate lines of business that should file the MCAS statement but then do not file the MCAS





Property/Casualty Statement

- ▶ Schedule P
 - ▶ Instructional revisions, mostly for clarification and consistency
 - ▶ Regrouping of instructions
 - ▶ Review carefully
 - ▶ An instruction may appear to be deleted, but was moved to a different location



2025 RBC



All RBC Formulas

- ▶ Many, many updated annual statement sources, format changes are few
 - ▶ To accommodate new statement reporting for bonds, new Schedule BA reporting, new definition of cash equivalents and short-term investments
- ▶ Format changes for PRBC and HRBC
 - ▶ Bond page; ICOs separated from ABS



| (1) Long-Term Bonds-Issuer Obligations Owned Schedule D – Pt 1–Sec 1 Book/Adjusted Carrying Value | (2) Asset-Backed Securities Owned Schedule D – Pt 1–Sec 2 Book/Adjusted Carrying Value | (3) Short-Term Investments Schedule DA – Part 1 Book/Adjusted Carrying Value | (4) Cash Equivalents Schedule E – Part 2 Book/Adjusted Carrying Value | (5) Subtotal |
|---|--|---|--|-----------------|
|---|--|---|--|-----------------|



All RBC Formulas

► Updated health underwriting factors

| TIERED RBC FACTORS* | | | | | | |
|---------------------|---|------------------------|-----------------|---|--------------|------------------|
| | Comprehensive (Hospital & Medical) - Individual & Group | Medicare Supplement | Dental & Vision | Stand-Alone Medicare Part D Coverage | Other Health | Other Non-Health |
| \$0 - \$3 Million | 0.1440 | 0.0987 | 0.1153 | 0.251 | 0.130 | 0.130 |
| \$3 - \$25 Million | 0.1440 | 0.0609 | 0.0716 | 0.251 | 0.130 | 0.130 |
| Over \$25 Million | 0.0844 | 0.0609 | 0.0716 | 0.151 | 0.130 | 0.130 |



All RBC Formulas

- ▶ **Action Levels**
 - ▶ Company action level triggered because of trend test is now an action level
 - ▶ Requires company to prepare and submit an RBC Plan to the state of domicile

| | |
|---|-----------------------------------|
| 1 | Company Action Level |
| 2 | Regulatory Action Level |
| 3 | Authorized Control Level |
| 4 | Mandatory Control Level |
| 5 | Company Action Level - Trend Test |
| 0 | None |



PRBC Trend Test

- ▶ Companies with RBC ratio $\geq 200\%$ but $< 300\%$ and have a combined ratio (as calculated in the RBC) greater than 120% trigger trend test
- ▶ Test looks for historical downward trend of RBC ratio over current year, prior year and the third prior year
 - ▶ Referred to as margins
 - ▶ PY - CY; 3rd PY-CY
 - ▶ Greater of the two 'decreases in margin' is subtracted from CY Total Adjusted Capital to estimate a potential future capital level
 - ▶ Assumes trend will continue in future
 - ▶ Triggers Company Action Level if amount is > 1.9 times current Authorized Control Level



PRBC Trend Test

| | <u>Annual Statement Source</u> | <u>Amount</u> | <u>Result</u> |
|--|---|---------------|---------------|
| <u>Original RBC % Before Applying Trend Test</u> | | | |
| (1) Authorized Control Level Risk-Based Capital Including Basic Operational Risk | PR032, C(1) L(65) | 0 | |
| (2) Total Adjusted Capital | PR029, C(2) L(15) | 0 | |
| (3) RBC % | L(2)C(1) / L(1)C(1) | 0.000% | |
| <u>Combined Ratio Data</u> | | | |
| (4) Premiums Earned | Pg 4, Col 1, L 1 | 0 | |
| (5) Losses Incurred | Pg 4, Col 1, L 2 | 0 | |
| (6) Loss Expenses Incurred | Pg 4, Col 1, L 3 | 0 | |
| (7) Other Underwriting Expenses Incurred | Pg 4, Col 1, L 4 | 0 | |
| (8) Aggregate Write-ins for Underwriting Deductions | Pg 4, Col 1, L 5 | 0 | |
| (9) Dividends to Policyholders | Pg 4, Col 1, L 17 | 0 | |
| (10) Net Written Premiums | Pg 8, Col 6, L 35 | 0 | |
| <u>Combined Ratio Calculation</u> | | | |
| (11) Loss Ratio | [Pg 4, Col 1, L 2 + Pg 4, Col 1, L 3] / Pg 4, Col 1, L 1 | 0.000% | |
| (12) Dividend Ratio | Pg 4, Col 1, L 17 / Pg 4, Col 1, L 1 | 0.000% | |
| (13) Expenses Ratio | [Pg 4, Col 1, L 4 + Pg 4, Col 1, L 5] / Pg 8, Col 6, L 35 | 0.000% | |
| (14) Combined Ratio | L(11) + L(12) + L(13) | 0.000% | |
| (15) Trend Test Result † | If L(3) Between 200% & 300% & L(14) > 120%, L(15), YES, Otherwise, NO | | |

†The Trend Test applies only if L(15) = YES

‡If result = YES, the company triggers regulatory attention at the Company Action Level based on the trend test.



HRBC Trend Test

- ▶ Companies with RBC ratio $\geq 200\%$ but $< 300\%$ and have a combined ratio (as calculated in the RBC) greater than 105% generate a Company Action Level
 - ▶ Combined ratio calculated as:
 - ▶ Total revenue / Underwriting deductions

TREND TEST

- (7) Total Revenue
- (8) Underwriting Deductions
- (9) Combined Ratio
- (10) RBC Ratio
- (11) Trend Test Result
- (12) Level of Action, if any, including Trend Test

Annual Statement Source

Page 4, Line 8

Page 4, Line 23

Line (8)/(7)

Line(1)/(4)

If Line (10) is between 200% and 300% and Line (9) $> 105\%$, then "Yes," otherwise "No"

0.000%

0.000%



Tax Credit Structures

- ▶ Different reporting between Property/Casualty & Health
 - ▶ Property/Casualty - Other Long-Term Assets PR008

| | | |
|---|--|--------|
| Yield Guaranteed State Tax Credit Investments | Federal Guaranteed Low Income Housing Tax Credits | 0.0014 |
| Qualifying Federal Tax Credit Investments | Federal Non-Guaranteed Low Income Housing Tax Credits | 0.0260 |
| Qualifying State Tax Credit Investments | State Guaranteed Low Income Housing Tax Credits | 0.0260 |
| Other Tax Credit Investments | State Non-Guaranteed Low Income Housing Tax Credits | 0.1500 |

Also changes to Asset
Concentration



Tax Credit Structures

- ▶ Different reporting between Property/Casualty & Health
 - ▶ Health - Other Long-Term Assets XR008

Collateral Loans

Less: Non-Admitted Collateral Loans

Net Collateral Loans

| | |
|---|--------|
| NAIC 01 Working Capital Finance Investments | 0.0500 |
| NAIC 02 Working Capital Finance Investments | 0.0038 |
| Other Long-Term Invested Assets Excluding Collateral Loans, Tax Credit Investments , Residual Tranches or Interests and Working Capital Finance Investments | 0.0125 |
| Yield-Guaranteed State Tax Credit Investments Federal Guaranteed Low Income Housing Tax Credits | 0.2000 |
| Qualifying Federal Tax Credit Investments Non-Guaranteed Low Income Housing Tax Credits | 0.0014 |
| Qualifying State Tax Credit Investments Guaranteed Low Income Housing Tax Credits | 0.0260 |
| Other Tax Credit Investments State Non-Guaranteed Low Income Housing Tax Credits | 0.0260 |
| | 0.1500 |

Also changes to Asset
Concentration



Property / Casualty RBC

- ▶ Instructional clarification for Climate Conditioned CAT Exposure
 - ▶ Information to reflect annual loss dollars for the given reporting year
- ▶ Addition of wildfire and severe convective storms to CAT modeling attestation
- ▶ Underwriting Risk
 - ▶ Annual updates to Industry Average Development factors & Investment Income factors for reserves and premiums



Property / Casualty

RBC

Underwriting Risk - PR017 Line 1 Reserves

| Schedule P LOB | 2025 | 2024 |
|--------------------------------|-------|-------|
| Homeowners / Farmowners | 0.997 | 1.020 |
| Private Passenger Auto | 1.072 | 1.061 |
| Commercial Auto | 1.110 | 1.115 |
| Workers Compensation | 0.912 | 0.882 |
| Commercial Multiple Peril | 1.018 | 1.024 |
| Medical Prof Liab- Occurrence | 0.914 | 0.910 |
| Medical Prof Liab- Claims Made | 1.024 | 0.996 |
| Special Liability | 0.995 | 0.996 |
| Other Liability | 0.995 | 0.993 |
| Fidelity/Surety | 0.875 | 0.875 |
| Special Property/Pet | 0.985 | 0.989 |
| Auto Physical Damage | 1.002 | 1.999 |
| Other (Credit A&H) | 0.938 | 0.942 |
| Financial / Mortgage Guaranty | 0.486 | 0.493 |
| International | 1.927 | 2.168 |
| Reins. Property & Financial | 0.925 | 0.930 |
| Reins. Liability | 1.090 | 1.054 |
| Products Liability | 0.911 | 0.882 |
| Warranty | 0.978 | 0.991 |

Property / Casualty

RBC

Underwriting Risk - Page 18, Line 1 Premium

| Schedule P LOB | 2025 | 2024 |
|--------------------------------|-------|-------|
| Homeowners / Farmowners | 0.700 | 0.695 |
| Private Passenger Auto | 0.807 | 0.799 |
| Commercial Auto | 0.792 | 0.787 |
| Workers Compensation | 0.649 | 0.646 |
| Commercial Multiple Peril | 0.683 | 0.684 |
| Medical Prof Liab- Occurrence | 0.763 | 0.752 |
| Medical Prof Liab- Claims Made | 0.840 | 0.828 |
| Special Liability | 0.565 | 0.583 |
| Other Liability | 0.664 | 0.649 |
| Fidelity/Surety | 0.374 | 0.375 |
| Special Property/Pet | 0.552 | 0.559 |
| Auto Physical Damage | 0.731 | 0.733 |
| Other (Credit A&H) | 0.714 | 0.711 |
| Financial / Mortgage Guaranty | 0.159 | 0.158 |
| International | 1.184 | 1.153 |
| Reins. Property & Financial | 0.597 | 0.587 |
| Reins. Liability | 0.788 | 0.760 |
| Products Liability | 0.609 | 0.594 |
| Warranty | 0.641 | 0.641 |

Ongoing RBC Projects

- ▶ Property / Casualty RBC
 - ▶ Addition of wildfire and modeling to Rcat section
 - ▶ Possibility of adding a covariance calculation to the Rcat
 - ▶ Revisions to the premium and reserve concentration factors



Ongoing RBC Projects

- ▶ Property / Casualty RBC & Health RBC
 - ▶ Considering applying bond factors to SVO-identified bond funds
 - ▶ LRBC already does this
 - ▶ Considering using a ‘look through’ for fixed income investments reported on Schedule BA
 - ▶ Life RBC already has this in place



Ongoing Health RBC Projects

- ▶ Proposed H2 reporting format and factors
 - ▶ Will ultimately affect P/C insurers with health business
 - ▶ Released for comment November 6, 2025
 - ▶ 75-day comment period ending January 20, 2026
 - ▶ Currently only format changes; factor revisions to come later
 - ▶ Structure changes to more closely align with the lines of business report in the Analysis of Operations in the Health Annual Statement.
 - ▶ Would result in new separate reporting for several lines of business



Proposed H2 Structural Changes

Experience Fluctuation Risk

| | Line of Business | (1) Comprehensive (Hospital & Medical) Individual | (2) Comprehensive (Hospital & Medical) - Group | (3) Title XVIII - Medicare | (4) Title XIX - Medicaid | (5) Medicare Supplement | (6) Vision Only | (7) Dental Only | (8) Stand-Alone Medicare Part D Coverage | (9) Other Health | (10) Other Non- Health | (11) Total |
|------------------|--|--|---|----------------------------------|--------------------------------|-------------------------------|--------------------|--------------------|---|---------------------|------------------------------|---------------|
| (1) [†] | Premium | | | | | | | | | | | |
| (2) [†] | Other Health Risk Revenue | | | | | XXX | | | | | | XXX |
| (3) | Medicaid Pass-Through Payments Reported as Premiums | XXX | XXX | XXX | | XXX | XXX | XXX | XXX | XXX | XXX | XXX |
| (4) | Underwriting Risk Revenue (1) + (2) - (3) | | | | | | | | | | | |
| (5) [†] | Net Incurred Claims | | | | | | | | | | | XXX |
| (6) | Medicaid Pass-Through Payments Reported as Claims | XXX | XXX | XXX | | XXX | XXX | XXX | XXX | XXX | XXX | |
| (7) [†] | Fee-For-Service Offset | | | | | XXX | | | | | | XXX |
| (8) | Underwriting Risk Incurred Claims (5) - (6) - (7) | | | | | | | | | | | XXX |
| (9) | Underwriting Risk Claim Ratio (8)/(4) | | | | | | | | | | | 1.000 XXX |
| (10) | Underwriting Risk Factor for Initial Amounts of Premium [‡] | 0.1440 | 0.1440 | 0.1440 | 0.1440 | 0.0987 | 0.1153 | 0.1153 | 0.251 | 0.130 | 0.130 | XXX |
| (11) | Underwriting Risk Factor for Excess of Initial Amount [‡] | 0.0844 | 0.0844 | 0.0844 | 0.0844 | 0.0609 | 0.0716 | 0.0716 | 0.151 | 0.130 | 0.130 | XXX |
| (12) | Income Adjustment Factor | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.0000 | XXX | XXX | XXX | XXX |
| (13) | Composite Underwriting Risk Factor | A1 | A1 | A1 | A1 | A2 | A2 | A2 | A1 | 0.130 | 0.130 | XXX |
| (14) | Base Underwriting Risk RBC = (4) x (9) x (13) | | | | | | | | | | | |
| (15) | Managed Care Discount Factor [*] | | | | | | | | | | | XXX XXX |
| (16) | RBC After Managed Care Discount = Lines (14) x (15) | | | | | | | | | | | XXX |
| (17) | Alternate Risk Charge ^{**} | | | | | | | | | | | XXX XXX |
| (18) | Net Alternate Risk Charge ^{***} | | | | | B1 | B2 | B2 | B3 | B4 | | XXX |
| (19) | Net Underwriting Risk RBC (MAX{Line (16), Line (18)}) for Columns (1) through (9), Column (10), Line (14) | | | | | | | | | | | |



Ongoing Health RBC Projects

- ▶ Proposed new parts to Exhibit 7 in the annual statement to be used in revised Managed Care Credit
 - ▶ Released for comment through January 20, 2026 then will be finalized and submitted to Blanks Working Group to go through their process
 - ▶ Will add:
 - ▶ Summary of transaction with providers direct medical payments
 - ▶ Summary of transactions with providers ceded reinsurance
 - ▶ Summary of transaction with providers net medical expense payment



Proposed Exhibit 7 - Annual Statement

| Payment Method | 1 <u>Comprehensive (Hospital & Medical) - Individual</u> | 2 <u>Comprehensive (Hospital & Medical) - Group</u> | 3 <u>Title XVIII - Medicare</u> | 4 <u>Title XIX - Medicaid</u> | 5 <u>Medicare Supplement</u> | 6 <u>Vision Only</u> | 7 <u>Dental Only</u> | 8 <u>Stand-Alone Medicare Part D Coverage</u> | 9 <u>Other Health</u> |
|--|---|--|------------------------------------|----------------------------------|---------------------------------|-------------------------|-------------------------|--|--------------------------|
| Capitation Payments: | | | | | | | | | |
| 1. Medical groups..... | | | | | | | | | |
| 2. Intermediaries..... | | | | | | | | | |
| 3. All other providers..... | | | | | | | | | |
| 4. Total capitation payments..... | | | | | | | | | |
| Other Payments: | | | | | | | | | |
| 5. Fee-for-service..... | | | | | | | | | |
| 6. Contractual fee payments..... | | | | | | | | | |
| 7. Bonus/withhold arrangements – fee-for-service..... | | | | | | | | | |
| 7.1 Bonus payment exposure..... | | | | | | | | | |
| 7.2 Bonus payments made..... | | | | | | | | | |
| 8. Bonus/withhold arrangements – contractual fee payments..... | | | | | | | | | |
| 8.1 Bonus payment exposure..... | | | | | | | | | |
| 8.2 Bonus payments made..... | | | | | | | | | |
| 9. Bundled payments..... | | | | | | | | | |
| 10. Upside and downside risk sharing..... | | | | | | | | | |
| 10.1 Downside risk exposure..... | | | | | | | | | |
| 10.2 Downside risk due / received..... | | | | | | | | | |
| 10.3 Actual recovered downside risk..... | | | | | | | | | |
| 11. Non-contingent salaries..... | | | | | | | | | |
| 12. Aggregate cost arrangements..... | | | | | | | | | |
| 13. All other payments..... | | | | | | | | | |
| 14. Total other payments..... | | | | | | | | | |
| 15. Total (Line 4 plus Line 14) | | | | | | | | | |



Other Accounting Changes

ACCOUNTING



Accounting Updates

- ▶ Issue papers added to statutory hierarchy
 - ▶ Now on Level 5 of hierarchy
 - ▶ Mean issue papers only to be used if they do not conflict with other sources of statutory procedure (anything in higher levels)
 - ▶ Reason; issue papers are not normally revised if SSAP has modifications or revisions

Statutory Hierarchy

Level 1 - SSAPs
Concepts

Level 2 - Interpretations

Level 3 - A/S instructions & P&P manual

Level 4 - SAP Preamble & Statement of

Level 5 - Nonauthoritative GAAP & Issue Papers



Accounting Updates

- ▶ Consistency of residual tranches and residual security interests
 - ▶ Revisions to SSAP Nos. 26, 30, 32, 46, 48
 - ▶ Removes previous language in each SSAP and refers reader to SSAP No. 21 for accounting guidance and reporting
 - ▶ To be reported in Schedule BA

For example, SSAP No. 32 now states that investments in the form of preferred stock that are in substance residual interests or a residual security tranche fall under SSAP No. 21



Accounting Updates

- ▶ *SSAP No. 86 - Derivatives*
 - ▶ Clarifying language regarding derivative financing premium
 - ▶ Terminology used was inconsistent
 - ▶ Companies to amortize derivative premiums over the life of the derivative contract
 - ▶ Derivative premium is not an “underlying” in a derivative contract, but cost of acquiring or writing a derivative contract
 - ▶ Should not be a component in determining realized losses at expiration
 - ▶ Also resulted in revisions to annual statement instructions for Schedule DB
 - ▶ More work to come



- ▶ Revisions to SSAP No. 61 and Appendix A-791 from Valuation Analysis Working Group referral regarding reinsurance risk transfer and reserve credit
 - ▶ Reinsurance treaties involving more than one type of reinsurance and having an interdependence of the types of reinsurance, must do risk analysis in the aggregate, not separately
 - ▶ For example, experience refunds based on the aggregate experience
 - ▶ Companies evaluating risk transfer separately have overstated reinsurance reserve credit
 - ▶ As adopted by SAPWG, effective year-end 2026 to all existing treaties
 - ▶ Adopted by SAPWG & APPTF, but delayed by Financial Conditions Committee
 - ▶ Financial Conditions Committee has released for comment through November 7 a new version



SAPWG - Exposed for Comment

- ▶ Investment Subsidiaries (annual statement reporting)
 - ▶ Statement proposal to remove separate reporting of in annual statement in Schedule D - Part 6 - Section 1
 - ▶ There is no concept of investment subsidiaries in SSAP No. 97
 - ▶ Remove “look through” approach for Asset Valuation Reserve (AVR)
 - ▶ Recommends removing references and “look through” approach from Life/Fraterna RBC



SAPWG - Exposed for Comment

- ▶ Sale-Leaseback transactions (SSAP No. 22)
 - ▶ Clarifies that cash received by insurer from sale do not qualify for sale-leaseback accounting if access is restricted
 - ▶ Would need to be accounted for by the seller using financing method
 - ▶ Will also develop transition guidance



SAPWG - Exposed for Comment

- ▶ Mortgage loans in statutory trusts (SSAP No. 37)
 - ▶ Allows residential mortgage loans, cash and cash equivalents, real estate in **QUALIFIED** statutory trusts to be reported as if directly held
 - ▶ Trust liabilities reported in accordance with *AP&P Manual*
 - ▶ Revenue and expenses as if directly held
 - ▶ Additional Note disclosure
- ▶ Retirement plan assets held at NAV to be included in fair value disclosure (Note 20)



SAPWG - Exposed for Comment

- ▶ *SSAP No. 101 - Income Taxes*
 - ▶ Would adopt certain revisions from ASU 2019-12 and fully incorporating U.S. GAAP guidance from APB No. 28
- ▶ *SSAP Nos. 21, 26, 43*
 - ▶ Expansion of annual audited only disclosures
 - ▶ Expands reporting of non-bond debt securities by maturity date
 - ▶ More consistent reporting of impaired securities for all debt securities and residuals



SAPWG - Exposed for Comment

- ▶ A new SSAP for ALM (asset liability management) derivatives
- ▶ Private placement securities



Investment Analysis Office (IAO) (aka SVO, SSG)



Collateralized Loan Obligations (CLOs)

Modeling of CLOs being delayed (again) until
year-end 2026



P&P Manual Revisions

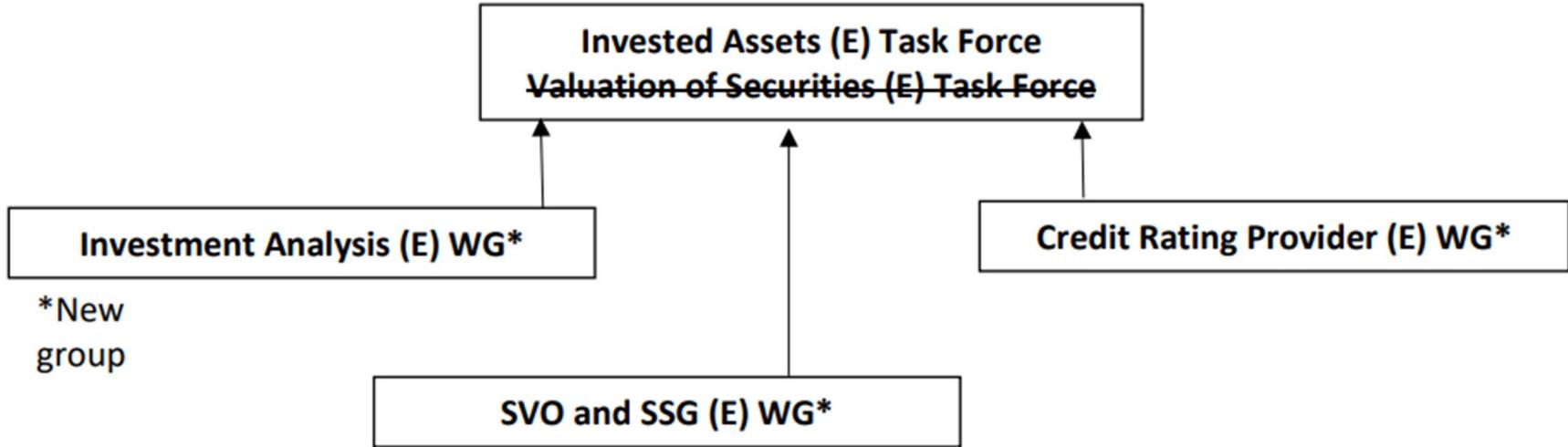
- ▶ Requirement to file private letter rationale reports within 90 days
- ▶ Requires private rating letter rationale reports to contain analytical substance
- ▶ Technical corrections caps on NAIC Designations of CRP-rated securities



Reorganization of the Valuation of Securities Task Force (VOSTF)



Reorganization of VOSTF



Reorganization of VOSTF

- ▶ Invested Assets Task Force
 - ▶ Commissioner level membership
 - ▶ Other groups to consist of deputy-level financial, actuarial, and investment regulatory expertise
 - ▶ Oversee other groups
 - ▶ Provide education to regulators on investment products
 - ▶ Understand new or evolving investment products



Reorganization of VOSTF

- ▶ Invested Analysis Working Group
 - ▶ Monitor risks associated with all types of invested assets
 - ▶ Analyze new or evolving investment products or new investment characteristics that could pose risks to insurers
 - ▶ Provide recommendations for policy changes
 - ▶ Develop best practice examples of supervisory plans that monitor complex investments
 - ▶ Oversee revised portfolio analysis product
 - ▶ Implementation of revised systems
 - ▶ Monitor information technology and data resources needs to ensure data can be retrieved efficiently and effectively



Reorganization of VOSTF

- ▶ Securities Valuation Office & Structured Securities Working Group
 - ▶ Very similar to what VOSTF has been doing
 - ▶ Review and monitor SVO and SSC
 - ▶ Maintain and revise *P&P Manual*
 - ▶ Identify improvement to the credit filing and designation processes
 - ▶ Recommend to Task Force scope of securities required to be filed with SVO and to be filed/modeled with SSG
 - ▶ Oversee private letter rating submissions and review
 - ▶ Provide periodic operational reports on categories of filings



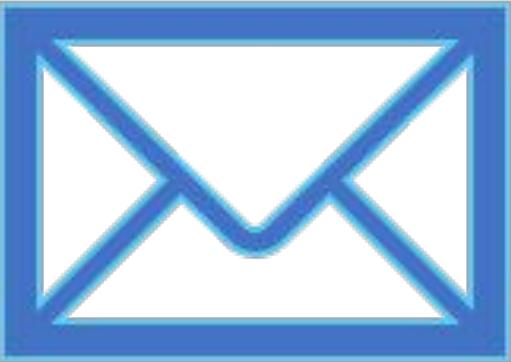
Reorganization of VOSTF

- ▶ Credit Rating Provider Working Group
 - ▶ To be staffed by 2 new dedicated staff members with credit rating analytical or quantitative backgrounds
 - ▶ Once developed implement CRP due diligence framework
 - ▶ PWC assisting in development of due diligence framework
 - ▶ Goal is to reduce “blind” reliance on CRPs
 - ▶ Will retain SVO ability to perform credit assessment where needed
 - ▶ Identify improvements to the filing exempt (FE) process



Blanks Working Group Meeting November 5





Any Questions?

You can find me at:

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THANK YOU!