# LIFE, ACCIDENT AND HEALTH & FRATERNAL INSURERS

Company Name:		NAIC Company Code:
Company Contact:		Telephone:
Required Filings in the State of:	Pennsylvania	Filings Made During the Year 2025

# PENNSYLVANIA DOMESTIC AND FOREIGN FILERS

# TIMELY ELECTRONIC SUBMISSIONS THROUGH THE NAIC SATISFY PA FILING REQUIREMENTS!

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- 1. Filings which are submitted to the NAIC are considered to be simultaneously filed with the PA Insurance Commissioner. Please do *not* also submit them, via email or in hardcopy, to the PA Insurance Department. {Note: There are a few exceptions to this rule as stated in the "Notes and Instructions" chart on pages 5-11 below, notably Amended filings (see page 7).}
- 2. All financial Life, Accident and Health & Fraternal filings for PA (which are *not* otherwise submitted directly to the NAIC or are submitted through a vendor filing portal such as *Gain Compliance*) are to be emailed to the PA Insurance Department at: **RA-IN-LIFE-FRTRNL-TITL@PA.GOV**.
  - a. Emailed filings are to be in PDF format.
  - b. Emailed filings should include filing(s) for only one legal entity and not combined filers.
  - c. The email subject line should begin with the company's legal entity name, followed by the 5-digit NAIC code, followed by the type/name of the filing.
  - d. The PDF document file name for each attachment should mirror the naming convention of the email's subject line (i.e., the company's legal entity name, followed by the 5-digit NAIC code, followed by the type/name of the filing).
  - e. ZIP files cannot be accepted through the PA Insurance Department's firewall. {Note: There is a software solution however, through Gain Compliance, with a no charge or obligation reporting feature that has the ability to submit state-specific filings through a zip submission process directly to the PA Insurance Department. Other vendors may offer a similar filing feature.}
- 3. Filing documents should reflect the appropriate wet signatures and where necessary, the appropriate notarization. A scanned copy of the original wet signature is permitted.
- 4. There is a portal for submitting electronic filing fees for Form B and Amendment(s) as well as Extraordinary Dividends. Visit: https://www.bpp.ob.pa.gov/Customer. Select the 3rd payment type labeled "To make a payment for any other Commonwealth of PA Service, Fee or Program". Each payment type is assigned a distinct Program ID for entry into the designated field. Code 093 is for Form B Filings and Amendments, and Code 094 is for Extraordinary Dividends. Enter your name, address and email. Then, complete all of the following fields in order to clear the obligation with the PA Insurance Department:

Agency: Insurance (pull down)

Program ID: 093-FAD Form B Filings (pull down) or 094-FAD Ext Ord Dividends (pull down)

Amount: Filing Amount

Payment

Reference: NAIC Number / Group Code (example: xxxxx / xxxx)

Select your payment method (either ACH which is free or credit card) and finally, remit proof of payment with the emailed/electronic filing.

- 5. Hard copy submissions are *not* preferred but remain an option for state filing documents that are *not* otherwise filed with the NAIC. Submissions that do *not* include a check should be sent to: PA Insurance Department, ATTN: Financial Analysis, 1345 Strawberry Square, Harrisburg, PA 17120. Submissions that include a check should be sent to the same address but to the attention of *Administration* instead of Financial Analysis.
- 6. Annual License Renewal filing fees will be invoiced by the PA Insurance Department with remittance instructions no later than March 31, 2025. Please do **not** remit payment in advance of the invoice.

{Note: For all other filings which include a filing fee, <u>no</u> invoice will be sent. A copy of the payment receipt (whether a screenprint from the PA Insurance Department's online payment system or a copy of the check mailed to the PA Insurance Department) should be included with the emailed/electronic filing.}

7. Questions can be emailed to the company's assigned PA Insurance Department Financial Analyst, Manager, or submitted to: RA-IN-ANALYSIS@PA.GOV.

(1)	(2)	(3)		(4)		(5)	(6)	(7)
Check	Line	REQUIRED FILINGS	EII I	NC DECHIDEM	ENTC	DUE	FILING	APPLICABLE
List	#	REQUIRED FILINGS	FILING REQUIREMENTS  Domestic Foreign			DATE	SOURCE	NOTES
23.50			State	NAIC <sup>4</sup>	State	2.112	Sociez	1,0125
I. NAI	IC FIN	ANCIAL STATEMENTS						
	1	Annual Statement (8½ x 14)	EO	EO	EO	3/1	NAIC	A - M, Q
	1.1	Printed Investment Schedule detail (Pages E01- E29)	ЕО	ЕО	ЕО	3/1	NAIC	
	2 Quarterly Financial Statement (8½ x 14)		ЕО	EO	ЕО	5/15, 8/15, 11/15	NAIC	A-M, Q
	3	Separate Accounts Annual Statement (8½ x 14)	EO	EO	ЕО	3/1	NAIC	
II. NA	IC SUI	PPLEMENTS						
	11	Accident & Health Policy Experience Exhibit	EO	EO	N/A	4/1	NAIC	
	12	Credit Insurance Experience Exhibit	EO	EO	N/A	4/1	NAIC	
	13	Health Supplement	EO	EO	N/A	3/1	NAIC	
	14	Life, Health & Annuity Guaranty Association Assessable Premium Exhibit, Parts 1 and 2	ЕО	ЕО	N/A	4/1	NAIC	
	15	Long-term Care Experience Reporting Forms	EO	EO	N/A	4/1	NAIC	
	16	Management Discussion & Analysis	EO	EO	N/A	4/1	Company	
	17	Market Conduct Annual Statement Premium Exhibit for Year	EO	ЕО	N/A	3/1	NAIC	
	18	Medicare Supplement Insurance Experience Exhibit	EO	ЕО	N/A	3/1	NAIC	
	19	Medicare Part D Coverage Supplement	ЕО	EO	N/A	3/1, 5/15, 8/15, 11/15	NAIC	
	20	Risk-Based Capital Report	ЕО	EO	N/A	3/1	NAIC	
	21	Schedule SIS	EO	N/A	N/A	3/1	NAIC	
	22	Supplemental Compensation Exhibit	EO	N/A	N/A	3/1	NAIC	0
	23	Supplemental Health Care Exhibit (Parts 1 & 2)	EO	ЕО	N/A	4/1	NAIC	
	24	Supplemental Investment Risk Interrogatories	EO	EO	N/A	4/1	NAIC	
	25	Supplemental Schedule O	EO	EO	N/A	3/1	NAIC	

(1)	(2)	(3)		(4)		(5)	(6)	(7)
Check	ck Line REQUIRED FILINGS		EII I	NG REQUIREM	FNTS	DUE	FILING	APPLICABLE
List	#	REQUIRED FIEITGS	FILI	Domestic Domestic	Foreign	DATE	SOURCE	NOTES
			State	NAIC <sup>4</sup>	State		~ 0 0 0 0 0 0	
	26	Supplemental Term and Universal Life Insurance Reinsurance Exhibit	EO	EO	N/A	4/1	NAIC	
	27	Trusteed Surplus Statement	ЕО	ЕО	N/A	3/1, 5/15, 8/15, 11/15	NAIC	
	28	Variable Annuities Supplement	EO	EO	N/A	4/1	NAIC	
	29	VM 20 Reserves Supplement	EO	EO	N/A	3/1	NAIC	
	30	Workers' Compensation Carve-Out Supplement	EO	EO	N/A	3/1	NAIC	
Actuar	ial Relat	ed Items						
	31	Actuarial Certification regarding use 2001 Preferred Class Table	ЕО	ЕО	N/A	3/1	Company	
	32	Actuarial Certification Related Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities	ЕО	ЕО	N/A	3/1	Company	
	33	Actuarial Memorandum Related to Universal Life with Secondary Guarantee Policies required by Actuarial Guideline XXXVIII 8D	ЕО	N/A	N/A	4/30	Company	
	34	Actuarial Opinion	EO	ЕО	N/A	3/1	Company	
	35	Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit	ЕО	ЕО	N/A	3/1	Company	
	36	Actuarial Opinion on Synthetic Guaranteed Investment Contracts	ЕО	ЕО	N/A	3/1	Company	
	37	Actuarial Opinion on X-Factors	EO	ЕО	N/A	3/1	Company	
	38	Actuarial Opinion required by Modified Guaranteed Annuity Model Regulation	ЕО	ЕО	N/A	3/1	Company	
	39	Request for Life PBR Exemption (formerly called the Company-wide Exemption)	ЕО	ЕО	N/A	PA 7/1, NAIC 8/15	Company	AA
	40	Executive Summary of the PBR Actuarial Report	See Note T	N/A	N/A	4/1	Company	Т
	41	Life Summary of the PBR Actuarial Report	See Note T	N/A	N/A	4/1	Company	T
	42	Variable Annuities Summary of the PBR Actuarial Report	See Note T	N/A	N/A	4/1	Company	Т
	43	PBR Actuarial Report	See Note T	N/A	N/A	4/1	Company	Т
	44	RAAIS required by Valuation Manual	EO	N/A	N/A	4/1	Company	P
	45	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXV	ЕО	ЕО	N/A	3/1,5/15, 8/15, 11/15	Company	
	46	Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV	ЕО	ЕО	N/A	3/1,5/15, 8/15, 11/15	Company	
	47	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value)	ЕО	ЕО	N/A	3/1,5/15, 8/15, 11/15	Company	
	48	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value)	ЕО	EO	N/A	3/1,5/15, 8/15, 11/15	Company	
	49	Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI	ЕО	ЕО	N/A	3/1,5/15, 8/15, 11/15	Company	
	50	RBC Certification required under C-3 Phase I	EO	EO	N/A	3/1	Company	
	51	RBC Certification required under C-3 Phase II	EO	EO	N/A	3/1	Company	
	52	Statement on non-guaranteed elements - Exhibit 5 Int. 3	ЕО	ЕО	N/A	3/1	Company	
	53	Statement on par/non-par policies – Exhibit 5 Int. 1&2	ЕО	ЕО	N/A	3/1	Company	
III. EI		ONIC FILING REQUIREMENTS						
	61	Annual Statement Electronic Filing	N/A	ЕО	N/A	3/1	NAIC	
	62	March.PDF Filing	N/A	EO	N/A	3/1	NAIC	
	63	Risk-Based Capital Electronic Filing	N/A	EO	N/A	3/1	NAIC	

(1)	(2)	(3)		(4)		(5)	(6)	(7)
Check	Line	REQUIRED FILINGS	FILI	NG REQUIREM	ENTS	DUE	FILING	APPLICABLE
List	#			Domestic	Foreign	DATE	SOURCE	NOTES
			State	NAIC <sup>4</sup>	State			
	64	Risk-Based Capital.PDF Filing	N/A	EO	N/A	3/1	NAIC	
	65	Separate Accounts Electronic Filing		EO	N/A	3/1	NAIC	
	66	Separate Accounts.PDF Filing	N/A	EO	N/A	3/1	NAIC	
	67	Supplemental Electronic Filing	N/A	EO	N/A	4/1	NAIC	
	68	Supplemental.PDF Filing	N/A	EO	N/A	4/1	NAIC	
	69	Quarterly Statement Electronic Filing	N/A	ЕО	N/A	5/15, 8/15, 11/15	NAIC	
	70	Quarterly.PDF Filing	N/A	ЕО	N/A	5/15, 8/15, 11/15	NAIC	
	71	June.PDF Filing	N/A	EO	N/A	6/1	NAIC	
IV. A	U <b>DIT/I</b>	NTERNAL CONTROL RELATED REPO	RTS					
	81	Accountants Letter of Qualifications	EO	EO	N/A	6/1	Company	R
	82	Audited Financial Reports	EO	EO	N/A	6/1	Company	R
	83	Audited Financial Reports Exemption Affidavit	N/A	N/A	N/A	N/A	Company	R
	84	Communication of Internal Control Related Matters Noted in Audit	ЕО	EO	N/A	8/1	Company	R
	85	Independent CPA (change)	EO	N/A	N/A	N/A	Company	R
	86	Management's Report of Internal Control Over Financial Reporting	EO	N/A	N/A	8/1	Company	R
	87	Notification of Adverse Financial Condition	EO	N/A	N/A	N/A	Company	R
	88	Relief from the five-year rotation requirement for lead audit partner	ЕО	EO	N/A	3/1	Company	R
	89	Relief from the one-year cooling off period for independent CPA	ЕО	EO	N/A	3/1	Company	R
	90	Relief from the Requirements for Audit Committees	ЕО	EO	N/A	3/1	Company	R
	91	Request for Exemption to File Management's Report of Internal Control Over Financial Reporting	ЕО	N/A	N/A	N/A	Company	R
V. ST.	ATE R	EQUIRED FILINGS						
	101	Certificate of Compliance	N/A	N/A	N/A	N/A	State	W
	102	Certificate of Deposit	N/A	N/A	N/A	N/A	State	W
	103	Certificate of Valuation	N/A	N/A	N/A	N/A	State	
	104	Corporate Governance Annual Disclosure <sup>1</sup>	EO	N/A	N/A	6/1	Company	Z
	105	Filings Checklist (with Column 1 completed)	N/A	N/A	N/A	N/A	State	
	106	Form B-Holding Company Registration Statement <sup>2</sup>	ЕО	N/A	N/A	3/31	Company	S
	107	Form F-Enterprise Risk Report <sup>2</sup>	EO	N/A	N/A	3/31	Company	S
	108	ORSA <sup>3</sup>	EO	N/A	N/A		Company	N
	109	Premium Tax {Note: Do not file with the PA Insurance Department}	See Note D	N/A	See Note D	N/A	State	D
	110	State Filing Fees	ЕО	N/A	ЕО	Invoiced	State	С
	111	Signed Jurat	EO	N/A	ЕО	3/1	NAIC	G, H, I, M
	112	ORSA Summary Report Notice of Filing <sup>3</sup>	EO	N/A	N/A	6/1	Company	N
	113	Accountant's "Awareness" Letter	EO	N/A	N/A	N/A	Company	R
	114	Exemption from Prohibited Non-Auditing Services	ЕО	N/A	N/A	6/1	Company	R
	115	Request for Extension to Filing	EO	N/A	N/A	5/21	Company	R
	116	Biographical Affidavits	EO	N/A	N/A	N/A	NAIC	U
	117	Certificate of Advertising Compliance	EO	N/A	EO	3/1	Company	V
	118	Changes in Governance	EO	N/A	EO	N/A	Company	X
	119	Notification of Address Changes	EO	N/A	EO	N/A	NAIC	Y
	120	Annual Valuation Filing	EO	N/A	N/A	N/A	Company	T
	121	Legal Entity Grid	EO	N/A	N/A	7/1	NAIC	S

(1)	(2)	(3)		(4)		(5)	(6)	(7)
Check	Line	REQUIRED FILINGS	FILING REQUIREMENTS		DUE	FILING	APPLICABLE	
List	#		Domestic		Foreign	DATE	SOURCE	NOTES
			State	NAIC <sup>4</sup>	State			
	122	Group Capital Calculation	EO	N/A	N/A	3/31	Company	

#### **LEGEND:**

- N/A: Depending on the column where the N/A is placed, the filing is *not* required in PA, *not* required by the NAIC or does not have a specific due date. {Note to Foreign Filers: Filings may still be required by the domiciliary state.}
- **EO**: Electronic Only filings. {Note: Please remember that when you see an EO in both the State and NAIC columns, the NAIC submittal satisfies PA's filing requirement.} Only filings which are not otherwise submitted to the NAIC (but which are required in PA) are to be emailed to: **RA-IN-LIFE-FRTRNL-TITL@PA.GOV**.

**NAIC**: Form Source is the NAIC authorized vendor.

#### **NOTES:**

- 1. Pennsylvania has adopted the NAIC's Corporate Governance Annual Disclosure ("CGAD") Model Act. Annual disclosure is required of all insurers or holding company groups by June 1. The CGAD is a state filing and is not submitted to the NAIC. It should be emailed to: RA-IN-LIFE-FRTRNL-TITL@PA.GOV. {Note: When prepared at the group level, the CGAD is only required to be filed with the group's lead state, but it is preferred that it also be emailed to the PA Insurance Department when PA is not the lead state.}
- <sup>2.</sup> Pennsylvania requires an annual Form F filing by holding company groups. Consistent with the Form B filing requirements, the Form F is a state filing only and is *not* filed with the NAIC. It should be emailed to: **RA-IN-LIFE-FRTRNL-TITL@PA.GOV**. {Note: Form F is only required to be filed with the group's lead state, but it is preferred that it also be emailed to the PA Insurance Department when PA is not the lead state.}
- 3. Pennsylvania has adopted the NAIC's Risk Management and Own Risk and Solvency Assessment ("ORSA") Model Act. The ORSA report is required annually by insurers and insurance groups meeting the designated premium threshold established for the filing year. The ORSA is a state filing and is *not* submitted to the NAIC. It should be emailed to: **RA-IN-LIFE-FRTRNL-TITL@PA.GOV**. ORSA filers are to notify the PA Insurance Department of the expected filing date by June 1 (pursuant to 40 P.S. § 991.2605) and the filings are to be submitted no later than October 1. {Note: When prepared at the group level, the ORSA is only required to be filed with the group's lead state, but it is preferred that it also be emailed to the PA Insurance Department when PA is not the lead state.}
- 4. Refer to the NAIC *Annual Statement Instructions* and the NAIC *Quarterly Statement Instructions* for further guidance. Questions can be directed to the NAIC or emailed to the Company's assigned PA Insurance Department Financial Analyst, Manager, or submitted to: RA-IN-ANALYSIS@PA.GOV.

NOT	NOTES AND INSTRUCTIONS {Note: A-M & Q Apply to All Filings}							
A	Required Filings Email	RA-IN-LIFE-FRTRNL-TITL@PA.GOV						
В	Domestic Insurers Mailing Address	State: Pennsylvania Insurance Department ATTN: Financial Analysis 1100 Walnut Stre 1345 Strawberry Square Kansas City, MO Harrisburg, PA 17120 Phone: 816.783.8 {Note: The PA Insurance Department mailing address is only to be used when necessary.}	64106-2197					

NOT	ES AND INSTRUCTI	IONS {Note: A-M & Q Apply to All Filings}
С	Annual Certificate of Authority Renewals	There is a \$750 annual statement filing fee. Invoices will be issued electronically (no later than March 31, 2025) to the contact on record detailing the applicable annual statement/license renewal fees. <i>Please do not remit payment in advance of the invoice</i> .
		Foreign/Alien Insurers: The invoice for foreign/alien companies (also domestic reciprocal/interinsurance exchanges) will include an <i>additional</i> \$100 fee (or an additional \$80 fee for domestic/foreign fraternal benefit societies) for renewal of the Certificate of Authority. The Certificates of Authority for these insurers are not mailed but can be printed at any time by the Company during the effective term of the Certificate from the PA Insurance Department's website. Annual renewal invoices will contain instructions for online printing of the insurer's renewed Certificate of Authority.
		Contact the Company Licensing Division for all questions regarding company annual statement filing/renewal fee invoices and Certificates.
		Phone: 717.787.2735 Email: RA-IN-COMPANYLICENSE@PA.GOV
D	Mailing Address for Premium Tax Payments	Premium tax filings are <i>not</i> processed by the PA Insurance Department and if received, will be returned to the Company. Companies should mail premium tax payments directly to the PA Department of Revenue. Visit the PA Department of Revenue's website for contact information:
		https://www.pa.gov/en/agencies/revenue/contact-us.html
		{Note: A receipt of filing with the PA Department of Revenue does not satisfy any necessary filing requirements of the PA Insurance Department. Further, any filings received by the PA Insurance Department after the filing deadline, may be penalized as authorized by law according to 40 P.S. § 443(e)(1) and 40 P.S. § 991.1410.}
Е	Submission Instructions	As directed in column (4) on pages 2-4 above, all filings must be electronically submitted to the NAIC or emailed to <b>RA-IN-LIFE-FRTRNL-TITL@PA.GOV</b> on or prior to the due date in column (5). If the due date falls on a weekend or holiday, the due date is extended to the next business day.
F	Late Filings	Late filings will be penalized as authorized by law according to 40 P.S. § 443(e)(1) and 40 P.S. § 991.1410. Penalties are not to exceed \$200 per filing per day.
G	Signature Requirements	A scanned copy of the original signature is required. Filings may not carry stamped facsimile signatures.
Н	Signature Notarization Certification	The following three officers (or persons performing similar functions of PA domiciled insurers) are required to certify on the jurat page, quarterly and annual financial statements:
		<ul> <li>Chief Executive Officer (President);</li> <li>Chief Financial Officer (Treasurer); and</li> <li>Corporate Secretary.</li> </ul>
		• If the Company does <i>not</i> utilize the above titles, it must notify the PA Insurance Department Financial Analysis Division and explain how the positions of the individuals signing the financial statement perform similar functions to a Chief Executive Officer (President), Chief Financial Officer (Treasurer) and/or Corporate Secretary.
		• Individuals performing the duties of both Chief Financial Officer (Treasurer) and Corporate Secretary must sign separately under each title.

6

NOTES AND INSTRUCT	IONS {Note: A-M & Q Apply to All Filings}
	<ul> <li>Appropriate notarization is required.</li> <li>The name and address of any consulting person or organization who participated in the preparation of the annual statement must be noted on the jurat page.</li> <li>PA has no requirements that individuals must be listed in the "Other" category.</li> <li>Signed Jurat pages should be signed by all domestics either in their I-Site filing or emailed directly to our PA resource accounts.</li> <li>Foreign/Alien Insurers: If your domestic state accepts less than three signatures on the jurat page, please provide proof of this with your submission to the PA Insurance Department.</li> </ul>
I Amended Filings	<ul> <li>Domestic company amended items must be electronically filed with the PA Insurance Department and the NAIC. {Note: This is one of the exceptions noted on page 1.} Amendments are to be filed along with a letter of explanation for each amended item and a statement as to what impact the amendment(s) has on the year end Risk Based Capital ("RBC") report. Only the amended pages should be filed.</li> <li>If any amendments are determined by the company to impact the results of the RBC calculation as reported on the five-year historical page of the annual statement, then a revised RBC report must be filed with the PA Insurance Department and the NAIC along with an amended five-year historical page.</li> </ul>
	<ul> <li>A new jurat page completed in all respects, must accompany all amendments.         Signature requirements for the original filing described above in Notes G and H should be followed for any amendment.</li> <li>Foreign/Alien Insurers: You are not required to submit any additional filings for amendments.</li> </ul>
J Extensions	There is no provision in the insurance laws of Pennsylvania that permit granting an extension for the filing of the annual or quarterly statements.
K Bar Codes	Required for PA and NAIC filings. Please follow the instructions in the NAIC <i>Annual Statement Instructions</i> .
L NONE Filings	If no entry is to be made on an item on a form, you must write "None", "Not Applicable" or "No Changes" to complete the item in accordance with the NAIC <i>Annual and Quarterly Statement Instructions</i> . Blank items in Schedules, Interrogatory Responses, Supplemental Compensation Exhibits or Notes to the Financial Statements will not be considered properly filed.
M Vendors for Completing Blanks	The PA Insurance Department does not endorse or promote any individual private software vendor. The NAIC provides a list of vendors of annual, quarterly and risk-based capital software vendors on its website. Please refer to:  https://content.naic.org/industry filing participation vendors.htm

NOT	ES AND INSTRUCTI	ONS {Note: A-M & Q Apply to All Filings}
N	Own Risk and Solvency Assessment	Pennsylvania has adopted the NAIC's Risk Management and Own Risk and Solvency Assessment ("ORSA") Model Act. The ORSA report is required annually by insurers and insurance groups meeting the designated premium threshold established for the filing year.
		The ORSA is a state filing and is <i>not</i> submitted to the NAIC. It should be emailed to <b>RA-IN-LIFE-FRTRNL-TITL@PA.GOV</b> . {Note: When prepared at the group level, the ORSA is only required to be filed with the group's lead state but it is preferred that it also be emailed to the PA Insurance Department when PA is not the lead state.}
		ORSA filers are to notify the PA Insurance Department of the expected filing date by June 1 (pursuant to 40 P.S. § 991.2605) and the filings are to be submitted no later than October 1. For guidance in preparing the ORSA, see the <i>ORSA Guidance Manual</i> on the NAIC website.
О	Supplemental Compensation	Follow the NAIC <i>Annual Statement Instructions</i> for Parts 1-3. The Part 2 modification is ONLY for PA domestic insurers that are licensed in PA.
	Exhibit	Companies are required to file the Supplemental Compensation Exhibit and should email it to: <b>RA-IN-LIFE-FRTRNL-TITL@PA.GOV</b> . Filing this exhibit marked "NONE" is not acceptable.
		Insurers shall disclose the compensation of:  1. The Chief Executive Officer; and
		2. Up to four additional persons (regardless of amount) in the following sequence:
		<ul> <li>Remaining officers whose compensation is not limited to a de minimis fee for attendance at meetings of the board of directors.</li> </ul>
		b. Non-officer employees whose compensation exceeds \$100,000 annually.
P	Regulatory Asset Adequacy Issues Summary	In addition to the Statement of Actuarial Opinion filed with the annual financial statements on or before March 1 each year, PA requires the filing of a Regulatory Asset Adequacy Issues Summary ("RAAIS") by April 1. Details of the RAAIS may be found in VM-30 of the NAIC <i>Valuation Manual</i> . The RAAIS will be maintained as confidential by the PA Insurance Department but should be sent separately from the Statement of Actuarial Opinion and clearly marked "Confidential".
		Foreign/Alien Insurers: RAAIS is not required to be filed.
Q	Resources Available from NAIC	Detailed guidance on accessing various resources available from the NAIC to assist in filing accurate statements can be found on the NAIC's website under <i>Accounting and Reporting Resources</i> .
R	Audit/Internal Control Related Reports	Notes related to Audit/Internal Control Related Reports have been consolidated into a separate memo which can be found on the PA Insurance Department's website.
S	Annual & Other Holding Company Requirements	Companies subject to the Holding Company Registration Act can find forms at: https://www.pa.gov/agencies/insurance/filing-reporting-requirements/financial-filing-requirements/holding-company-related-filing.html
T	Annual Valuation Filing	Detailed guidance to assist companies that report reserve liabilities on their annual statement can be found on the PA Insurance Department's website as follows:  Life Companies:
		https://www.insurance.pa.gov/Companies/FilingRequire/Documents/LifeValuationFilingInstructions.pdf

		Fraternal Benefit Societies:
		https://www.insurance.pa.gov/Companies/FilingRequire/Documents/FraternalValuationFilingInstructions.pdf
U	Biographical Affidavits	All pages of the NAIC biographical affidavit are to be completed. Incomplete biographical affidavits will be considered unfiled. All biographical affidavits should be updated for current officers and directors at the time any information changes.
		Biographical affidavits must be filed with a wet signature scan and kept current for officers and directors. The PA Insurance Department requires original biographical affidavits to be filed for all officers and directors listed on the jurat page:
		<ul> <li>when a new officer or director is named;</li> <li>when the information of any current officer and/or director changes; and</li> <li>when the last biographical affidavit filed is five years old.</li> </ul>
		https://content.naic.org/industry/ucaa/biographical-affidavit
		<b>Foreign/Alien Insurers</b> : Biographical affidavits should <i>not</i> be submitted to the PA Insurance Department if already submitted to the state of domicile.
V	Certificate of Advertising Compliance	Companies that are required to file an annual statement must also file an annual Certificate of Advertising Compliance pursuant to 31 Pa. Code § 51.5 stating that the advertisements disseminated by the Company complied with, or were made to comply in all respects, with provisions of PA insurance laws and regulations. The Certificate must be executed by an authorized officer of the company.
		The PA Insurance Department does not dictate a required form or format. Companies should submit their Certificates of Advertising Compliance on Company authorized letterhead.
		Certificates should be emailed to: <b>RA-IN-LIFE-FRTRNL-TITL@PA.GOV</b> by March 1. The subject line of the email and attached PDF should follow the naming convention outlined on page 1 (i.e., the company's legal entity name, followed by the 5-digit NAIC code, followed by the type/name of the filing).
		<b>Foreign/Alien Insurers</b> : You are required to file a Certificate of Advertising Compliance in the same manner as domestic filers.
W	Certificates of Compliance and Certificates of Deposit	Domestic insurers may request Certificates of Compliance. Companies with securities on deposit with the Commonwealth of PA may request Certificates of Deposit. The cost is \$20 per Certificate. A cover letter should accompany the payment (or copy of scanned payment receipt from the online payment system) and include the following:
		<ul> <li>Company's legal name</li> <li>NAIC number</li> <li>Certificate type(s) requested</li> <li>Number of Certificates requested</li> <li>Date the Company would like the Certificate(s) prepared "as of" {Note: The date of receipt of the request will be used unless another acceptable date is requested by the Company.}</li> <li>Mailing address for the Certificate(s)</li> </ul>
		PDFs are available by request in your cover letter. Your cover letter and payment (or copy of scanned payment receipt from the online payment system) can be emailed to: RA-IN-COMPANYLICENSE@PA.GOV or mailed to:
		Pennsylvania Insurance Department ATTN: Company Licensing Division

		1345 Strawberry Square Harrisburg, PA 17120
		Questions should be directed to the Company Licensing Division at 717.787.2735 or RA-IN-COMPANYLICENSE@PA.GOV.
X	Changes in Governance	Changes made during the year to the Bylaws or Articles of Incorporation are to be submitted via email to: RA-IN-COMPANYLICENSE@PA.GOV or mailed to:
		Pennsylvania Insurance Department ATTN: Company Licensing Division 1345 Strawberry Square Harrisburg, PA 17120
		There is a filing fee of \$300 for restating or amending the Articles of Incorporation. Amendments to the Articles of Incorporation (i.e., name change, recapitalization, etc.) require the prior approval of the PA Insurance Department <i>before</i> they are submitted to the PA Department of State for final approval.
		There is no filing fee for changes to the Bylaws. However, amendments to Bylaws of domestic insurers require prior approval of the PA Insurance Department pursuant to 40 P.S. § 991.2422(b) and 40 Pa. C.S.A. § 6328.
		<b>Foreign/Alien Insurers:</b> There is no need to file amended Bylaws. Amended Articles of Incorporation however, should be submitted electronically to the NAIC using a corporate amendment application.
		https://content.naic.org/industry/ucaa/foreign-corporate-amendment-application
		Separately, there is a \$300 filing fee for amended Articles of Incorporation which should be paid via the PA Insurance Department's online payment system (with a copy of the receipt emailed to RA-IN-COMPANYLICENSE@PA.GOV) or paid by check and mailed to: PA Insurance Department, ATTN: Administration, 1326 Strawberry Square, Harrisburg, PA 17120.
Y	Notification of Address & Contact	Changes to a company's <i>statutory home office address</i> should be emailed to <b>RA-IN-COMPANYLICENSE@PA.GOV</b> .
	Changes	Changes to a company's <i>mailing address</i> or <i>contact information</i> require electronic submission of NAIC UCAA Form 14 through the NAIC's UCAA system. The NAIC will, in turn, notify the PA Insurance Department of changes submitted via Form 14.
		https://www.naic.org/industry_ucaa.htm
		<b>Foreign/Alien Insurers:</b> Changes to a company's <i>statutory home office address</i> should be submitted electronically to the NAIC using a corporate amendment application.
		https://content.naic.org/industry/ucaa/foreign-corporate-amendment-application
		Changes to a company's <i>mailing address</i> or <i>contact information</i> require electronic submission of NAIC UCAA Form 14 through the NAIC's UCAA system.
Z	Corporate Governance Annual	PA adopted the NAIC's Corporate Governance Annual Disclosure ("CGAD") Model Act. Annual disclosure is required of all insurers or insurance groups by June 1.
	Disclosure	The CGAD is a state filing and is not submitted to the NAIC. It should be emailed to: <b>RA-IN-LIFE-FRTRNL-TITL@PA.GOV</b> . <i>{Note: When prepared at the group level, the CGAD is only required to be filed with the group's lead state, but it is preferred that it also be emailed to the PA Insurance Department when PA is not the lead state.}</i>

10

NOTES AND INSTRUCTIONS {Note: A-M & Q Apply to All Filings}		
AA	Request for Life Principle-Based Reserving Exemption	This was formerly known as the Company-wide Exemption. Consistent with Section 7142 of the PA Standard Valuation Law, the PA Insurance Department continues to require the annual filing of a Life Principle-Based Reserving ("PBR") Statement of Exemption Form from any domestic company seeking an exemption from PBR for life insurance policies acquired in the current calendar year.

#### **General Instructions for Companies to Use the Checklist:**

Pennsylvania's instructions for companies to file with the NAIC are included in the Checklist. Electronic filing is intended to be filing(s) submitted to the NAIC via the NAIC's internet filing site. Unless otherwise stated, companies are not required to file these same documents separately with the PA Insurance Department nor are hard copy filings required.

#### Column (1): Checklist

PA does *not* require the submission of a checklist.

Companies may use the checklist to submit to a state if the state requests or requires it. In that case, Companies should copy the checklist and place an "x" in this column when submitting information to the involved state.

#### Column (2): Line #

Line # refers to a standard filing number used for easy reference. This line number may change from year to year.

## Column (3): Required Filings

Name of item or form to be filed.

The *Annual Statement Electronic Filing* includes the annual statement data and all supplements due March 1, per the *Annual Statement Instructions*. This includes all detail investment schedules and other supplements for which the *Annual Statement Instructions* exempt printed detail.

The *March.PDF Filing* is the .pdf file for annual statement data, detail for investment schedules and supplements due March 1.

The Risk-Based Capital Electronic Filing includes all risk-based capital data.

The *Risk-Based Capital.PDF* Filing is the .pdf file for risk-based capital data.

The *Separate Accounts Electronic Filing* includes the separate accounts annual statement and investment schedule detail.

The **Separate Accounts.PDF Filing** is the .pdf file for the separate accounts annual statement and all investment schedule detail.

The **Supplemental Electronic Filing** includes all supplements due April 1, per the *Annual Statement Instructions*.

The **Supplement.PDF Filing** is the .pdf file for all supplemental schedules and exhibits due April 1.

The *Quarterly Electronic Filing* includes the quarterly statement data.

The *Quarterly.PDF Filing* is the .pdf for quarterly statement data.

The *June.PDF Filing* is the .pdf file for the Audited Financial Statements and Accountants Letter of Qualifications.

#### Column (4): Filing Requirements

This column notes whether filings are required to be submitted.

#### Column (5): Due Date

Indicates the date by which the company must file the form if a specific date is designated.

## Column (6): Filing Source

This column contains one of three words: "NAIC," "State," or "Company" indicating the source of the filing Form. In the case of "Company", the filer is to develop the form based upon the current state requirements and the NAIC Annual Statement Instructions.

## Column (7): Applicable Notes

This column contains references to the *Notes and Instructions* on pages 5-11 that apply to each item listed on the checklist. Notes A-M and Q apply to all filings. The company should carefully read these notes before submitting a filing.