2011 VALUATION FILING REQUIREMENTS

DOMESTIC LIFE INSURANCE COMPANIES

Absent a specific request from the Department, a Valuation Filing need not be submitted to the Bureau of Life Insurance if all of the following conditions are met:

1. A Health Annual Statement is filed.
2. No Certificate of Valuation is requested by the company or otherwise required.
3. No net life insurance and annuity obligations are reported.
4. No long-term care benefits are included in any policies, certificates, or contracts in force.
5. No disability income benefits are included in any policies, certificates, or contracts in force.

REQUIRED FILINGS

Documents	Copies	Due Date
2011 Annual Statement, including the Separate Account Statement	1	March 1, 2012
Statement of Actuarial Opinion, including reliance statements	1	March 1, 2012
"X factor" actuarial opinion	1	March 1, 2012
Statement required when there are policies in force that contain non-guaranteed elements	1	March 1, 2012
Reconciliation Worksheet for direct business, reinsurance assumed and reinsurance ceded	1	March 1, 2012
Electronic seriatim listing for direct business, reinsurance assumed and reinsurance ceded, together with other supporting spreadsheets and documents	1	March 1, 2012
Updates to the Actuarial Inventory	1	March 1, 2012
Accident and health claim reserve adequacy comments	1	March 1, 2012
Management's Discussion and Analysis	1	April 2, 2012
Interest Sensitive Life Insurance Products Report	1	April 2, 2012

Life Insurance Policies and Annuity Contracts

The following liabilities shall be covered by the valuation filing.

1. All reserve amounts, including reinsurance ceded, in Exhibit 5.
2. All liability amounts, including reinsurance assumed and reinsurance ceded, in Exhibit 7 (except dividend accumulations or refunds, and premium deposit funds).
3. All items in the Separate Account Statement which correspond to 1. and 2. above.

The annual statement **Reconciliation Worksheet** shall be one document, or not more than one document for each annual statement exhibit covered by the valuation filing, easily separated from the other valuation filing documents. It shall be clearly labeled and provide a reconciliation for each principal entry in the corresponding annual statement exhibit. Principal entries are those annual statement reserve entries (gross and ceded) other than reserve entries by valuation standard. Subtotals that sum to each principal entry shall be shown in the Reconciliation Worksheet with a reference to the precise location of that subtotal in a seriatim listing, summary report, query, or workpaper. All referenced summary reports shall be clearly consistent with a seriatim listing included with the valuation filing.

The annual statement Reconciliation Worksheet shall also contain subtotals of the number of policies, certificates, and contracts and the amount of insurance and income payable taken from the same sources as the reserve subtotals. These subtotals shall sum to corresponding entries from the Exhibit of Life Insurance or the Exhibit of Number of Policies as appropriate.

A complete description of the valuation standard such as 1980 CSO Male 4.5%, Age Last Birthday, Continuous, Smoker, Select and Ultimate, CRVM shall be identified for each seriatim detail record or other reserve calculation. Sufficient detail and appropriate summary levels shall be included in listings, reports, files, and workpapers to enable verification of any published reserve entry by valuation standard, but the Reconciliation Worksheet need not provide such verification.

The **electronic seriatim listing** (or spreadsheets/workpapers in support of miscellaneous reserves in Exhibit 5) shall show the reserve amount for each policy with subtotals that match the subtotals in the Reconciliation Worksheet. There shall be sufficient detail such that the accuracy of the calculations can be verified. The seriatim listing shall also contain the number of policies and certificates (or contracts) and the amount of insurance (or income payable) with subtotals that match the subtotals in the Reconciliation Worksheet.

In addition, seriatim listings shall be provided in support of **modified coinsurance** reserves for assumed business.

The updates to the **Actuarial Inventory** shall consist of the following information.

1. A **summary of all material reinsurance agreements** (assumed and ceded) that lists the counterparty, internal code or reference number, type of reinsurance, effective date, and a description of the business reinsured. The reinsurance summary shall be updated annually, as appropriate. The Bureau of Life Insurance will request reinsurance agreements for review at its discretion.

2. A complete copy of all **insurance policies and annuity contracts** (with sample schedule pages) and riders not previously included in a valuation filing for which:

   a. first year and single premium exceeds 20% of the total life insurance and annuity first year and single premium; or
   b. the amount of insurance exceeds 5% of the total amount of insurance in force; or
   c. for general account business the reserves exceed 5% of the total general account life insurance and annuity reserves covered by the valuation filing; or
   d. for separate account business the reserves exceed 5% of the total separate account life insurance and annuity reserves covered by the valuation filing.

   A form with a variation in language from a form previously included in a valuation filing that does not materially change the insurance coverage shall not be submitted.

3. A **glossary** which shall include the plan code, description of premiums and benefits, policy or contract form number and valuation standard for each plan. The glossary shall be updated if changes were made since the glossary was previously filed.

Accident and Health Insurance Policies

The following liabilities shall be covered by the valuation filing.

1. All reserve amounts, including reinsurance ceded, in Exhibit 6.

2. All accident and health liability amounts, including reinsurance assumed and reinsurance ceded, in Part 1 of Exhibit 8.

3. All Loss Adjustment Expense liability amounts, regardless of where the liability is reported in the Annual Statement.

The annual statement **Reconciliation Worksheet** shall be one document, or not more than one document for each annual statement exhibit covered by the valuation filing, easily separated from the other valuation filing documents. It shall be clearly labeled and provide a reconciliation for each entry in the corresponding annual statement exhibit. Subtotals that sum to each annual statement entry shall be shown in the Reconciliation Worksheet with a reference to the precise location of that subtotal in a seriatim listing, summary report, query, or workpaper. All referenced summary reports shall be clearly consistent with a seriatim listing included with the valuation filing.

The annual statement Reconciliation Worksheet shall also contain subtotals of the number of policies and premiums in force taken from the same sources as the reserve subtotals. These subtotals shall sum to appropriate entries from the Exhibit of Number of Policies.

A complete description of each valuation standard as to morbidity, mortality, interest rate and methodology shall be identified for each seriatim detail record or other reserve calculation.

The **electronic seriatim listing for unearned premium reserves and contract reserves** shall show the reserve amount for each policy with subtotals that match the subtotals in the Reconciliation Worksheet. There shall be sufficient detail such that the accuracy of the calculations can be verified. The seriatim listing shall also contain the number of policies and amount of premiums in force with subtotals that match the subtotals in the Reconciliation Worksheet.

The **electronic seriatim listing for claim reserves** calculated on a tabular basis shall show the reserve amount for each outstanding claim with subtotals that match the subtotals in the Reconciliation Worksheet. There shall be sufficient detail such that the accuracy of the calculations can be verified.

The spreadsheets used for **claim reserves calculated using a completion factor method** shall contain the data used in developing the completion factors and show the calculation of the completion factors and the reserves with reserve subtotals that match the subtotals in the Reconciliation Worksheet. There shall be sufficient detail such that the accuracy of the calculation of the completion factors and the reserves can be verified.

The documentation of **claim reserves calculated using a method other than tabular or completion factors** shall show the calculation of the reserves with subtotals that match the subtotals in the Reconciliation Worksheet. There shall be sufficient detail and information such that the accuracy of the calculations can be verified.

In addition, detailed support shall be provided for **modified coinsurance** reserves for assumed business.

The updates to the **Actuarial Inventory** shall consist of the following information.

1. A **summary of all material reinsurance agreements** (assumed and ceded) that lists the counterparty, internal code or reference number, type of reinsurance, effective date, and a description of the business reinsured. The reinsurance summary shall be updated annually, as appropriate. The Bureau of Life Insurance will request reinsurance agreements for review at its discretion.

2. A complete copy of all **insurance policies** (with sample schedule pages) and riders not previously included in a valuation filing for which:

   a. first year premium exceeds 20% of the total accident and health first year premium; or
   b. the premium exceeds 5% of the total accident and health premium; or
   c. the reserves exceed 5% of the total accident and health reserves covered by the valuation filing.

   A form with a variation in language from a form previously included in a valuation filing that does not materially change the insurance coverage shall not be submitted.

3. A **glossary** which shall include the plan code, description of premiums and benefits, policy form number and valuation standard for each plan. The glossary shall be updated if changes were made since the glossary was previously filed.

If the test of the previous year's claim reserves and liabilities set forth in **Schedule H** of the annual statement shows a significant understatement or overstatement in the reserves and liabilities for any line of business, the valuation filing shall identify the factors that the insurer believes caused the **understatement or overstatement**. An explanation of what adjustments, if any, were made in the reserve calculations because of the results of the reserve adequacy test shall be included in the valuation filing.

Health Annual Statement

If a Health Annual Statement is filed and a Valuation Filing is required or otherwise requested, all references above to exhibits and schedules in the Life and Accident and Health Annual Statement apply to the corresponding exhibits in the Health Annual Statement.

Disclosure of System Conversion

The filing's cover letter shall include disclosure of any conversion to a new administrative system or valuation system during the year. If there has been such a conversion, a document shall be included in the filing that includes a discussion of the steps taken to ensure that the accuracy and completeness of the liability records was preserved.

Revisions in the Filing Requirements

The required Microsoft Excel spreadsheets and Microsoft Access databases must be fully compatible with the 2007 version of these applications, the new Department standard.

Required Electronic Format Submission of Seriatim Listings and Completion Factor Data

Seriatim listings for direct business, reinsurance assumed, and reinsurance ceded shall be submitted in an electronic format. Data used in developing completion factors, together with the calculation of the completion factors and the related reserves, shall also be submitted in electronic format. Electronic format seriatim listings shall include the data fields and detail necessary to confirm the accuracy of the reserve calculation. Likewise, electronic format completion factor data shall include sufficient detail such that the accuracy of the completion factor and reserve calculations can be verified. The **Annual Statement shall be sent in book form** with all pages securely fastened inside the annual statement jacket. Valuation Filing documents not addressed above shall be submitted on paper or in a file format that is easily printed and read on letter size paper. Each Reconciliation Worksheet entry supported by electronic format information shall contain a reference to the name of the supporting electronic file as well as the location in the electronic file.

Electronic format seriatim listings and data used in developing completion factors shall be submitted on PC compatible CD ROM (CD-R) discs in an **uncompressed format**. A separate document with a table of contents shall be provided for the information submitted in electronic format identifying file names, with associated brief descriptions, for each disc.

Electronic files shall include self-explanatory column headings. Where additional file layout descriptions are needed for the data to be useful, explanations of the layout shall be included.

Seriatim listings shall be submitted as Microsoft Excel spreadsheets or Microsoft Access databases (version 2007). Submitted Microsoft Access databases shall **include queries** that generate the subtotals recorded in the Reconciliation Worksheet. Seriatim detail shall be structured such that the Department can easily produce alternative subtotals, either by modifying an existing query in a Microsoft Access database or by using the **subtotal functionality** in a Microsoft Excel spreadsheet. Data used in developing completion factors shall be submitted as Microsoft Excel spreadsheets (version 2007).

Please send the valuation filing to:

Tom Kilcoyne, Life Actuary
Bureau of Life Insurance
Office of Insurance Product Regulation
1311 Strawberry Square
Harrisburg, PA 17120

If you have questions, please contact Tom Kilcoyne at (717)783-8695 or Steve Boston at (717)783-2109.