



## Office of Insurance Regulation

### MEMORANDUM

**DATE:** January 31, 2025

**TO:** **Life, Accident and Health/Fratal Insurance Companies and Accredited Reinsurers Filing on the Life Blank**  
- Financial Statement Contact Person

**FROM:** Carolyn Morgan, Director  
Life & Health Financial Oversight

**SUBJECT: 2025 FILING REQUIREMENTS**

This package is designed to assist Life, Accident and Health insurers in preparing their filings with the Florida Office of Insurance Regulation (OIR). This information provides the filing requirements for companies holding a Certificate of Authority and Accredited Reinsurers. Please be advised that this checklist is provided as a reference document only and is not intended to alter, amend, or replace statutory requirements.

This package has been designed to conform to the format adopted by the NAIC Standard Reporting Formats Working Group. The working group's objective is to move towards uniformity in the states' filing requirements checklists.

Filings shall be made utilizing the 2024 Annual Statement Instructions and Blanks and the 2025 Quarterly Statement Instructions and Blanks adopted by the National Association of Insurance Commissioners (NAIC).

All filings should be made electronically through the Regulatory Electronic Filing System (REFS) via the Industry Portal located at <https://refs.fldfs.com/Account/Login>. This checklist has been revised to reflect the electronic requirements.

Notable highlights from this year's package include:

- Electronic signatures and electronic notarizations are accepted by the OIR. See Notes G and H for additional information.
- Service Area Expansion and Changes to the Plan of Operations need to be filed as a periodic filing to REFS (including narrative and projections). When including the current year in projections, the actual amounts already reported (i.e. January and February monthly), shall be utilized.
- Current projections must be on file, at a minimum, annually, by every domestic company, pursuant to section 624.424(6), Florida Statutes.
- CMS MA State Certification Requests shall be filed as a periodic filing to REFS and include a cover letter.
- Affiliated Agreements and amendments thereto must be submitted to REFS as an Affiliated Transaction filing type on form OIR-A1-2117 pursuant to Rule 69O-143.047, Florida Administrative Code. If an amendment to an agreement is submitted, a redline version of the agreement and the financial impact that the amended agreement will have on the company must be included.
- Requests for exemption, and other miscellaneous requests, shall be filed as a periodic filing to REFS.
- See the Notes and Instructions section for the proper filing of the premium tax returns and checks for payment of filing fees and premium tax payments with the Florida Department of Revenue.

- All insurers must file electronically with the NAIC. Foreign insurers who are commercially domiciled in Florida must file according to the Domestic Checklist column.
- Changes in Actuary now requires a letter from the actuary addressed to the insurer stating whether the actuary agrees with the statements contained in the insurers' letter, and if not, stating the reasons for which he or she does not agree. The insurer shall provide both letters to the OIR.
- In addition to the Jurat Page, the Actuarial Opinion, Risk Based Capital Report, and Reinsurance Summary Supplement are also required to be signed and scanned to an electronic document. All domestic insurers will be required to submit the scanned document as an uploaded document into REFS.
- A component has been added to REFS annual filings called Captive Reinsurance Report. See Note EE for a description of the information to be uploaded to this component if applicable.
- Components have been added to REFS holding company filings called Form F Enterprise Risk Report and Corporate Governance Annual Disclosure. Instructions updated. See Notes W and GG for more information.
- ORSA filings are required for applicable companies. See Notes FF and W for more information.

## **INSTRUCTIONS FOR FILING REQUIREMENTS: QUESTIONS & ANSWERS**

1. **The checklist indicates that the deadlines for filing statements are March 1, May 15, August 15, and November 15. Do they have to be received by the OIR on March 1, May 15, August 15, and November 15 or postmarked by these dates?**
  - > The REFS filings must be received by the OIR no later than 5:00 PM on the applicable due date. Since the NAIC's electronic filing system requires overnight to process any filings, companies need to file the appropriate documents with the NAIC **at least** 1 business day prior to the OIR's filing due date.
2. **If a filing requirement deadline falls on a weekend or holiday when is the filing due?**
  - > The deadline would be moved to the first business day following the original deadline.
3. **Will companies submitting late statements be fined?**
  - > **Yes.** Furthermore, failure to timely file statements is grounds for suspension of the company's Florida Certificate of Authority.
4. **May I attach my check for the premium tax payments to my filing?**
  - > Remit premium tax payments directly to the **Florida Department of Revenue** in accordance with instructions provided in this guide. Since the filing is now electronic, do not provide through the Regulatory Electronic Filing System (REFS) any premium tax information or documentation with the filing.
5. **May I attach my check for the Annual or Quarterly Statement filing fee to my filing?**
  - > **Non-Fraternal:** Remit Annual and Quarterly Statement filing fees directly to the **Florida Department of Revenue** in accordance with instructions provided in this guide. Since the filing is now electronic, do not provide any filing fee documentation with the filing.
  - > **Fraternal:** Annual Statement filing fees should be remitted to the Florida Department of Financial Services (DFS) on Form OIR-A2-2034 (annual).
6. **Do I need to attach a bar code to every filing submitted to the OIR?**
  - > N/A due to REFS.
7. **Where do I obtain the NAIC supplementary forms?**
  - > Obtain these from the supplier of your NAIC Annual Statement Blank. There are a number of independent companies that provide this service. Please refer to [www.naic.org](http://www.naic.org) for further information.
8. **Does the OIR require the filing of Risk Based Capital (RBC) reports?**
  - > **Yes.** This requirement applies to Florida domestics and foreign insurers who are commercially domiciled in Florida. Companies must upload the RBC report into a REFS filing.
  - > Requests for the RBC reports of foreign insurers will be made on a case-by-case basis as deemed necessary by the OIR.
9. **I have read the entire package but I still have questions regarding financial filings and/or solvency requirements (vs. rate/form or other). How can I reach the financial analyst in charge of my company?**
  - > To reach Life & Health Financial Oversight directly, dial (850) 413-3153. Support Staff will guide you to the analyst assigned to your company. The analyst can then give you his/her direct dial number for future reference.

**GENERAL INSTRUCTIONS  
FOR COMPANIES TO USE CHECKLIST**

**Please Note:** This state's instructions for companies to file with the NAIC are included in this Checklist. The NAIC will not be sending a checklist this year.

**Electronic Filing is intended to be filing(s) submitted to the NAIC via the NAIC Internet Filing Site which eliminates the need for a company to submit diskettes or CD-ROM to the NAIC. Companies are not required to file hard copy filings with the NAIC.**

**Column (1) (Checklist)**

Companies may use the checklist as guidance for filing requirements. Florida Domiciled Companies and Alien Companies using Florida as their Port of Entry must attach a Filings Checklist to each annual or quarterly filing submitted to the OIR. A Filings Checklist is optional for foreign companies.

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

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

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

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

**Column (4) (Number of copies)**

Indicates the number of copies that each foreign or domestic company is required to file for each type of form. The Blanks (EX) Task Force modified the 1999 *Annual Statement Instructions* to waive paper filings of certain NAIC supplements and certain investment schedule detail, if such investment schedule data is available to the states via the NAIC database. The checklists reflect this action taken by the Blanks (EX) Task Force. XXX appears in the "Number of Copies" "Foreign" column for the appropriate schedules and exhibits. **Some states have chosen to waive printed quarterly and annual statements from their foreign insurers and have chosen to rely upon the NAIC database for these filings. This waiver could include supplemental annual statement filings. The XXX in this column might signify that the state has waived the paper filing of the annual statement and all supplements.**

- The OIR will be relying on the financial documents filed with the NAIC for all foreign and domestic insurers.

**The Jurat Page will be required to be signed, notarized, and scanned to an electronic document. The scanned document will be required for all foreign and domestic insurers to provide the Jurat Page as an uploaded document into REFS.** The OIR will accept electronic signatures that comply with the requirements of Chapter 668, Florida Statutes, most notably section 668.50 ([http://leg.state.fl.us/Statutes/index.cfm?App\\_mode=Display\\_Statute&Search\\_String=&URL=0600-0699/0668/Sections/0668.50.html](http://leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0600-0699/0668/Sections/0668.50.html)). The OIR will also accept electronic notarizations that comply with Chapter 117, Part II, Florida Statutes, or the laws of the state from

which the document was notarized. The Florida Department of State provides a list of approved Remote Online Notaries at <https://dos.fl.gov/sunbiz/other-services/notaries/>.

**Column (5) (Due Date)**

Indicates the date on which the company must file the form with the OIR.

**Column (6) (Form Source)**

This column contains one of three words: “NAIC,” “State,” or “Company.” If this column contains “NAIC,” the company must obtain the forms from the appropriate vendor. If this column contains “State,” the state will provide the forms with the filing instructions. If this column contains “Company,” the company, or its representative (e.g., its CPA firm), is expected to provide the form based upon the appropriate state instructions or the NAIC *Annual Statement Instructions*.

**Column (7) (Applicable Notes)**

This column contains references to the Notes to the Instructions that apply to each item listed on the checklist. The company should carefully read these notes before submitting a filing.

**LIFE, ACCIDENT AND HEALTH INSURERS/FRATERNAL BENEFIT SOCIETIES**

COMPANY NAME: \_\_\_\_\_ NAIC Company Code: \_\_\_\_\_

Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

REQUIRED FILINGS IN THE STATE OF: **Florida** Filings Made During the **Year 2025**

FRATERNAL COMPANIES BEGIN FILING LIFE/FRATERNAL STATEMENT EFFECTIVE WITH FIRST QUARTER, 2019.

(1) Checklist	(2) Line #	(3) REQUIRED FILINGS FOR THE ABOVE STATE	(4) NUMBER OF COPIES*		(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES			
			Domestic							
			State	NAIC						
<b>I. NAIC FINANCIAL STATEMENTS</b>										
1	Annual Statement (8 1/2" x 14")	REFS	EO		3/1	NAIC	A-N			
1.1	Printed Investment Schedule detail (Pages E01-E29)	REFS	EO	xxx	3/1	NAIC	A-N			
2	Quarterly Financial Statement (8 1/2" x 14")	REFS	EO		5/15, 8/15, 11/15	NAIC	A-N			
3	Separate Accounts Annual Statement (8 1/2" x 14")	REFS	EO		3/1	NAIC	A-N			
<b>II. NAIC SUPPLEMENTS</b>										
11	Accident & Health Policy Experience Exhibit	xxx	EO		4/1	NAIC	A-N			
12	Credit Insurance Experience Exhibit	xxx	EO	xxx	4/1	NAIC	A-N			
13	Health Supplement		EO	xxx	3/1		A-N			
14	Life, Health & Annuity Guaranty Association Assessable Premium Exhibit, Parts 1 and 2	xxx	EO	xxx	4/1	NAIC	A-N			
15	Long-term Care Experience Reporting Forms	xxx	EO	xxx	4/1	NAIC	A-N			
16	Management Discussion & Analysis	REFS	EO		4/1	Company	A-N			
17	Medicare Supplement Insurance Experience Exhibit	xxx	EO	xxx	3/1	NAIC	A-N			
18	Medicare Part D Coverage Supplement	xxx	EO		3/1, 5/15, 8/15, 11/15	NAIC	A-N			
19	Risk-Based Capital Report	REFS	EO		3/1	NAIC	A-N			
20	Schedule SIS	REFS	N/A	N/A	3/1	NAIC	A-N			
21	Supplemental Compensation Exhibit	REFS	N/A	N/A	3/1	NAIC	A-N			
22	Supplemental Health Care Exhibit (Parts 1, 2 and 3)	xxx	EO		4/1	NAIC	A-N			
23	Supplemental Health Care Exhibit's Allocation Report	xxx	EO		4/1	NAIC	A-N			
24	Supplemental Investment Risk Interrogatories	xxx	EO		4/1	NAIC	A-N			
25	Supplemental Schedule O	xxx	EO	xxx	3/1	NAIC	A-N			
26	Supplemental Term and Universal Life Insurance Reinsurance Exhibit	REFS		EO	4/1	NAIC	A-N			
27	Trusted Surplus Statement	REFS		EO	3/1, 5/15, 8/15, 11/15	NAIC	A-N			
28	Variable Annuities Supplement		EO		4/1	NAIC	A-N			
29	VM 20 Reserves Supplement		EO		3/1	NAIC	A-N			
30	Workers' Compensation Carve-Out Supplement	REFS	EO		3/1	NAIC	A-N			
<b>Actuarial Related Items</b>										
31	Actuarial Certification regarding use 2001 Preferred Class Table	xxx	EO		3/1	Company	DD			
32	Actuarial Certification Related Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities	xxx	EO		3/1	Company	DD			
33	Actuarial Memorandum Related to Universal Life with Secondary Guarantee Policies required by Actuarial Guideline XXXVIII 8D	REFS		N/A	xxx	4/30	Company	DD		
34	Actuarial Opinion	REFS	EO		3/1	Company	DD			
35	Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit	REFS	EO		3/1	Company	DD			
36	Actuarial Opinion on Synthetic Guaranteed Investment Contracts	REFS		EO	3/1	Company	DD			
37	Actuarial Opinion on X-Factors	REFS	EO		3/1	Company	DD			
38	Actuarial Opinion required by Modified Guaranteed Annuity Model Regulation	xxx	EO		3/1	Company	DD			
39	Request for Life PBR Exemption (if applicable)	REFS		E/O	xxx	Commissioner 6/30, NAIC 8/15	Company	DD		
40	Executive Summary of the PBR Actuarial Report	xxx	N/A		4/1	Company	DD			
41	Life Summary of the PBR Actuarial Report	xxx	N/A		4/1	Company	DD			
42	Variable Annuities Summary of the PBR Actuarial Report	xxx		N/A	4/1	Company	DD			
43	PBR Actuarial Report (provide upon request)		N/A			Company	DD			
44	RAAIS required by <i>Valuation Manual</i>	REFS	N/A	xxx	4/1	Company	Y			
45	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXV	xxx	EO	xxx	3/1, 5/15, 8/15, 11/15	Company	DD			

(1) Checklist	(2) Line #	(3) REQUIRED FILINGS FOR THE ABOVE STATE	(4) NUMBER OF COPIES*		(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES			
			Domestic							
			State	NAIC						
	46	Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV	xxx	EO	xxx	3/1,5/15, 8/15, 11/15	Company	DD		
	47	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value)	xxx	EO	xxx	3/1,5/15, 8/15, 11/15	Company	DD		
	48	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value)	xxx	EO	xxx	3/1,5/15, 8/15, 11/15	Company	DD		
	49	Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI	xxx	EO	xxx	3/1,5/15, 8/15, 11/15	Company	DD		
	50	RBC Certification required under C-3 Phase I	REFS	EO		3/1	Company	DD		
	51	RBC Certification required under C-3 Phase II	REFS	EO		3/1	Company	DD		
	52	Statement on non-guaranteed elements - Exhibit 5 Int. #3	xxx	EO		3/1	Company	DD		
	53	Statement on par/non-par policies – Exhibit 5 Int. 1&2	xxx	EO		3/1	Company	DD		
		<b>III. ELECTRONIC FILING REQUIREMENTS</b>								
	61	Annual Statement Electronic Filing	xxx	EO	xxx	3/1	NAIC			
	62	March .PDF Filing	xxx	EO	xxx	3/1	NAIC			
	63	Risk-Based Capital Electronic Filing	xxx	EO	N/A	3/1	NAIC			
	64	Risk-Based Capital .PDF Filing	xxx	EO	N/A	3/1	NAIC			
	65	Separate Accounts Electronic Filing	xxx	EO	xxx	3/1	NAIC			
	66	Separate Accounts .PDF Filing	xxx	EO	xxx	3/1	NAIC			
	67	Supplemental Electronic Filing	xxx	EO	xxx	4/1	NAIC			
	68	Supplemental .PDF Filing	xxx	EO	xxx	4/1	NAIC			
	69	Quarterly Statement Electronic Filing	xxx	EO	xxx	5/15, 8/15, 11/15	NAIC			
	70	Quarterly .PDF Filing	xxx	EO	xxx	5/15, 8/15, 11/15	NAIC			
	71	June .PDF Filing	xxx	EO	xxx	6/1	NAIC			
		<b>IV. AUDIT/INTERNAL CONTROL RELATED REPORTS</b>								
	81	Accountants Letter of Qualifications	REFS	EO	N/A	6/1	Company	A-N, Z		
	82	Audited Financial Reports	REFS	EO		6/1	Company	A-N, Z		
	83	Audited Financial Reports Exemption Affidavit	REFS	N/A	N/A		Company	A-N, Z		
	84	Communication of Internal Control Related Matters Noted in Audit	REFS	EO	N/A	8/1	Company	A-N, Z		
	85	Independent CPA (change)	REFS	N/A	N/A		Company	A-N, Z		
	86	Management's Report of Internal Control Over Financial Reporting	REFS	N/A	N/A	8/1	Company	A-N, Z		
	87	Notification of Adverse Financial Condition	REFS	N/A	N/A		Company	A-N, Z		
	88	Relief from the five-year rotation requirement for lead audit partner	REFS	EO		3/1	Company	A-N, Z		
	89	Relief from the one-year cooling off period for independent CPA	REFS	EO		3/1	Company	A-N, Z		
	90	Relief from the Requirements for Audit Committees	REFS	EO		3/1	Company	A-N, Z		
	91	Request for Exemption to File Management's Report of Internal Control Over Financial Reporting	xxx	N/A	N/A		Company	A-N, Z		
		<b>V. STATE REQUIRED FILINGS</b>								
	101	Corporate Governance Annual Disclosure***	REFS	0	N/A	6/1	Company	GG		
	102	Filings Checklist (with Column 1 completed)	REFS	0	N/A		State	X		
	103	Form B-Holding Company Registration Statement	REFS	0	N/A		Company	W		
	104	Form F-Enterprise Risk Report ****	REFS	0	N/A		Company	W		
	105	ORSA*****	REFS	0	N/A		Company	FF		
	106	Premium Tax	1	0	1	See Notes	State/DOR	C, D		
	107	State Filing Fees		1	0	1	State	C		
	108	Signed Jurat	REFS	0	1		NAIC	G		
	109	Group Capital Calculation ( <b>File with lead state only</b> )			0					
	110	Certificate of Compliance	REFS	0	1	3/1	State of Dom	P		
	111	Certificate of Deposit	REFS	0	1	3/1	State of Dom	Q		
	112	Certificate of Valuation	REFS	0	1	3/1	State of Dom	R		
	113	Current Projections (Domestic Companies Only)	REFS	0	1	3/1	State	HH		

\*If XXX appears in this column, this state does not require this filing, if hard copy is filed with the state of domicile and if the data is filed electronically with the NAIC. If N/A appears in this column, the filing is required with the domiciliary state. EO (electronic only filing).

\*\*If Form Source is NAIC, the form should be obtained from the appropriate vendor.

\*\*\*For states that have adopted the NAIC Corporate Governance Annual Disclosure Model Act, an annual disclosure is required of all insurers or insurance groups by June 1. The Corporate Governance Annual Disclosure is a state filing only and should not be submitted by the company to the NAIC. Note however that this filing is intended to be submitted to the lead state if filed at the insurance group level. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm)

\*\*\*\*For states that have adopted the NAIC updated Holding Company Model Act, an enterprise risk report (Form F) filing is required annually by holding company groups. Consistent with the Form B filing requirements, the Form F is a state filing only and should not be submitted by the company to the NAIC. Note however, that this filing is intended to be submitted to the lead state. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm)

\*\*\*\*\*For states that have adopted the NAIC Risk Management and Own Risk and Solvency Assessment Model Act, a summary report is required annually by insurers and insurance groups above a specified premium threshold. The ORSA Summary Report is a state filing only and should not be submitted by the company to the NAIC. Note however that this filing is intended to be submitted to the lead state if filed at the insurance group level. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm)

	<b>NOTES AND INSTRUCTIONS (A-N APPLY TO ALL FILINGS)</b>	IF HARD COPY NOT REQUIRED, PLEASE DO NOT SEND TO FLORIDA.
A	<b>Required Filings Contact Person:</b>	<p>All Companies: Life &amp; Health Financial Oversight Phone: (850) 413-3153</p> <p>These Instructions apply to Life Blank filers.</p> <p>Please note the Florida Statutes or Florida Administrative Codes listed In these instructions may be accessed at <a href="http://www.floir.com">http://www.floir.com</a>.</p>
B	<b>Mailing Address:</b>	<p><u>No longer applicable to financial filings.</u></p> <p><b>NOTE:</b> Financial filings are to be submitted using the Regulatory Electronic Filing System (REFS) located on the OIR's Industry Portal at <a href="http://www.floir.com/iportal">http://www.floir.com/iportal</a>.</p> <p>Please refer to the REFS user guide posted on the OIR's website at <a href="https://www.floir.com/siteDocuments/REFSUsersGuide2-0.pdf">https://www.floir.com/siteDocuments/REFSUsersGuide2-0.pdf</a>.</p>
C	<b>Mailing Address for Filing Fees:</b>	<p><b>Sections 624.424(4) and 624.501(4)(a), Florida Statutes:</b> The \$250 Annual and Quarterly Statement filing fees <b>should NOT</b> be submitted to the OIR.</p> <p><b>Non-Fraternal:</b> Annual and Quarterly Statement filing fees should be remitted to the Florida Department of Revenue (DOR) with the annual and quarterly premium taxes on Forms DR-908 (annual) and DR-907 (quarterly) in accordance with instructions provided for those forms.</p> <p>To obtain copies of the forms, or for assistance in completing the forms, <b>insurers should contact the DOR directly</b> at: (800) 352-3671 <a href="http://floridarevenue.com/Pages/forms_index.aspx">http://floridarevenue.com/Pages/forms_index.aspx</a>.</p> <p><b>Fraternal: Mailing Address for Filing Fees:</b> The \$250 Annual Statement filing fees should NOT be submitted to the OIR.</p> <p>Annual Statement filing fees should be remitted to the Florida Department of Financial Services (DFS) on Form OIR-A2-2034 (annual).</p> <p>FLORIDA DEPARTMENT OF FINANCIAL SERVICES; REVENUE PROCESSING SECTION; PO BOX 6100; TALLAHASSEE, FL 32314-6100.</p> <p>The form is found on the OIR's website under the Fraternal Filing Requirements. <a href="http://www.floir.com/">http://www.floir.com/</a></p>
D	<b>Mailing Address for Premium Tax Payments:</b>	<p><b>Certificate of Authority</b> companies should reference section 624.509, Florida Statutes.</p> <p>Do <b>NOT</b> mail checks for premium taxes to the OIR. Payments should be remitted directly to the <b>DOR</b> on Forms DR-907 (quarterly) and DR-908 (annual) in accordance with instructions provided for those forms.</p> <p>To obtain copies of the forms or for assistance in completing the forms, <b>Insurers should contact the DOR directly at:</b> (800) 352-3671 <a href="http://floridarevenue.com/Pages/forms_index.aspx">http://floridarevenue.com/Pages/forms_index.aspx</a></p> <p><b>Mailing address:</b> Florida Department of Revenue 5050 West Tennessee Street, Tallahassee, FL 32399-0100</p> <p>Any delays in receipt by the Department of Revenue may result in an assessment of penalties and interest.</p> <p><b>PURSUANT TO SECTION 632.626, FLORIDA STATUTES, FRATERNAL</b></p>

E	<p><b>Delivery Instructions:</b></p>	<p>All filings must be submitted no later than indicated due date per <b>Rule 69O-137.001, Florida Administrative Code</b>. If the due date falls on a weekend or holiday, then the deadline is extended to the next business day.</p> <p>For purposes of this rule, the requirement that statements be filed with the OIR means that the statement has been transmitted electronically to the National Association of Insurance Commissioners and that the executed Jurat page of said statement has been transmitted electronically to the OIR via the Regulatory Electronic Filing System, "REFS." The date affixed by the OIR's electronic data processing system shall serve as evidence of the timeliness of the statement.</p> <p>Annual and quarterly statements in any other format shall not be submitted to the OIR.</p>
F	<p><b>Late Filings:</b></p>	<p><b>Sections 624.4211 and 624.424(5), Florida Statutes:</b> Companies will be fined \$1000 plus \$50 per day for late filings. The company's license may be suspended if filings are not received timely.</p> <p>Due to the processing time required by the NAIC for all electronically filed financial data, companies should submit their information to the NAIC at least one (1) business day prior to the filing due date.</p>
G	<p><b>Signatures:</b></p>	<p>The Jurat page requires at least two (2) notarized signatures pursuant to section 624.424, Florida Statutes, and then uploaded into REFS (see Note L).</p> <p>Signatures are required on annual and quarterly Jurat pages filed by all insurers, domestic, foreign, or alien companies using Florida as a port of entry (see Note H).</p> <p>Signatures are also required on the Statement of Actuarial Opinion (based on Asset Adequacy Analysis) and Regulatory Asset Adequacy Issues Summary (See Note Y).</p> <p>The OIR will accept electronic signatures that comply with the requirements of Chapter 668, Florida Statutes, most notably section 668.50 (<a href="http://leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&amp;Search_String=&amp;URL=0600-0699/0668/Sections/0668.50.html">http://leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&amp;Search_String=&amp;URL=0600-0699/0668/Sections/0668.50.html</a>). The OIR will also accept electronic notarizations that comply with Chapter 117, Part II, Florida Statutes, or the laws of the state from which the document was notarized. The Florida Department of State provides a list of approved Remote Online Notaries at <a href="https://dos.myflorida.com/sunbiz/other-services/notaries/remote-online-notary-public/approved-notaries/">https://dos.myflorida.com/sunbiz/other-services/notaries/remote-online-notary-public/approved-notaries/</a>.</p>

H	<b>Signature/Notarization/Certification:</b>	<p>Any required filings must have the notarized signature of the chief executive officer, regardless of title, and at least one of the following executive officers: President, Chief Financial Officer, Chief Operating Officer, Corporate Secretary, or Treasurer. The original documents are required to be submitted as scanned documents via REFS.</p> <p><b>Special Instructions for other filings:</b></p> <p>OIR-DO-1433: Reinsurance Summary Statement (Note V) Must be signed and notarized</p> <p>OIR-DO-1431: Audited Financial Statements Exemption Affidavit (Note Z) Must be signed and notarized</p> <p>OIR-C1-1524: Uniform Consent to Service of Process (Note T) Must be signed and sealed</p> <p>OIR-DO-516: Holding Company System Registration Statement (Note W) Must be signed, sealed &amp; notarized</p> <p>The OIR will accept electronic signatures that comply with the requirements of Chapter 668, Florida Statutes, most notably section 668.50 (<a href="http://leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&amp;Search_String=&amp;URL=0600-0699/0668/Sections/0668.50.html">http://leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&amp;Search_String=&amp;URL=0600-0699/0668/Sections/0668.50.html</a>). The OIR will also accept electronic notarizations that comply with Chapter 117, Part II, Florida Statutes, or the laws of the state from which the document was notarized. The Florida Department of State provides a list of approved Remote Online Notaries at <a href="https://dos.myflorida.com/sunbiz/other-services/notaries/remote-online-notary-public">https://dos.myflorida.com/sunbiz/other-services/notaries/remote-online-notary-public</a></p>
I	<b>Amended Filings:</b>	<p>Insurers must file amended items within 10 days of their amendment, along with an explanation of the amendments. If there are signature requirements for the original filing, those requirements should also be followed for any amendment. See SSAP No. 3 and the NAIC Annual Statement Instructions for guidance on amended filings.</p> <p><b>Domestics Only:</b> Amended statements shall also be filed to the respective REFS filing to the OIR with the explanation of change</p>
J	<b>Exceptions from Normal Filings:</b>	<p>Florida no longer requires life and health insurance companies to file hardcopy financial statements. However, a signed Jurat Page, Statement of Actuarial Opinion (based on Asset Adequacy Analysis), Regulatory Asset Adequacy Issues Summary and any other Florida specific filing not available to be downloaded from the NAIC database are required to be filed through REFS by all companies in compliance with the filing deadlines as defined herein (See Note O).</p>
K	<b>Bar Codes (State or NAIC)</b>	<p>Forms required only by the State of Florida (not NAIC) do not require bar codes due to REFS filing.</p>
L	<b>Signed Jurat Page:</b>	<p>A Signed Jurat Page is required for all foreign and domestic filings pursuant to section 624.424, Florida Statutes.</p>
M	<b>NONE Filings:</b>	<p>See NAIC Annual Statement Instructions regarding the placement of NONE or N/A on filing forms.</p>
N	<b>Filings new, discontinued or modified materially since last year:</b>	<p>A Corporate Governance Annual Disclosure is now part of domestic holding company filing due on June 1. Please refer to section 628.8015, Florida Statutes.</p> <p>Holding Company is a separate filing type in REFS from the annual filing. Please see note GG for more information.</p> <p>A component has been added to REFS annual filings called Captive Reinsurance Report. Please see Note EE for more information.</p> <p>Note W has been updated regarding holding company filing, ORSA, and Form F filing. See last four paragraphs.</p>

O	<b>Electronic Filing:</b>	Annual and quarterly statement filings should be sent to the NAIC via the internet website at <a href="http://www.naic.org">www.naic.org</a> .  For Florida specific supplemental information, file through REFS (see note B).
P	<b>Certificate of Compliance (Section 624.424(6), Florida Statutes)</b>	Each insurer shall file through REFS, with the Annual Statement, a Certificate of Compliance, issued by the public official having supervision of insurance in the insurer's state of domicile pursuant to section 624.424(6), Florida Statutes.  It shall certify that the company is duly organized and authorized to transact insurance therein and the kinds of insurance the company is authorized to transact.  <b>All domestic insurers are exempt from this requirement.</b>
Q	<b>Certificate of Deposit (Section 624.424(3), Florida Statutes)</b>	Each insurer shall file through REFS, with the Annual Statement, a Certificate of Deposit, issued by the public official having supervision of insurance in the insurer's state of domicile.  It shall certify the amount and the composition of the deposit maintained by the insurer in another state. The certificate must be an original, sealed by the insurer's state of domicile. (See Note N).  <b>All Florida domestic companies are exempt from this requirement.</b>
R	<b>Certificate of Valuation (COV) (Chapter 625, Part 1, Florida Statutes)</b>	Each foreign insurer shall file through REFS, with the Annual Statement (please do not file as a periodical file), a COV, issued by the public official having supervision of insurance in the insurer's state of domicile. The certificate must be an original and certified by the insurer's state of domicile. T  <b>FLORIDA DOMESTIC COMPANIES:</b> Please file your COV request to REFS as a periodical filing and include a cover letter.
S	<b>Disclosure of Material Transactions:</b>	Florida Statute 624.448 requires that each domestic insurer shall file a report with the OIR of Insurance Regulation disclosing a material acquisition of assets, a material disposition of assets, or a material non-renewal, cancellation, or revision of a ceded reinsurance agreement, unless the material acquisition or disposition of assets of the material non-renewal, cancellation, or revision of a ceded reinsurance agreement has been submitted to the OIR for review, approval, or informational purposes under another section of the Florida Insurance Code or adopted rule. If an amendment to an agreement is submitted, a redline version of the agreement and the financial impact that the amended agreement will have on the company must be included.  A copy of the report and each exhibit or other attachment must also be filed by the insurer with the National Association of Insurance Commissioners. The report required in this section is due within 15 days after the end of the calendar month in which the transaction occurs. Insurers should refer to section 624.448, Florida Statute, for complete detail of the filing requirements. Florida Statutes and Rules can be accessed on the internet at the following address: <a href="http://www.leg.state.fl.us">http://www.leg.state.fl.us</a> <a href="http://www.leg.state.fl.us/statutes/">http://www.leg.state.fl.us/statutes/</a>
T	<b>Service of Process Consent and Agreement (Section 624.422, Florida Statutes)</b>	Each Insurer is required to keep current the name and address of the person to whom process against it, served upon the Commissioner of Insurance Regulation, is to be forwarded. The insurer may change the designation at any time by making a new filing.  If there is a need to make a new filing, please contact: Harry Halley at (850) 413- 4203 for current instructions. (Also, refer to Note 'H' of "Filing Instructions").
U	<b>Insurance Department Examination Reports (Section 624.316, Florida Statutes)</b>	A copy of the domicile state's examination reports, both Financial and Market Conduct, are required to be filed through REFS with this OIR as soon as they are filed by the company's domicile state. If you have not already done so, please forward a copy through REFS of your most recent examination report.

V	<p><b>Reinsurance Document Filing Requirements</b>  <b>(Section 624.610(11), Florida Statutes)</b></p>	<p>Any domestic or commercially domiciled insurer ceding directly written loss under this section shall within 30 days of receipt of a summary statement or cover note, or in no event not later than 6 months after the effective date of the reinsurance treaty, file with the OIR one copy of a summary statement containing the information about each treaty, as required by section 624.610(11), Florida Statutes. (See Note H).</p> <p>The summary statement shall be signed and attested to by either the Chief Executive Officer or the Chief Financial Officer of the reporting insurer. DO NOT FILE A COPY OF THE TREATY unless specifically requested to do so.</p> <p>If the summary statement prepared by the ceding insurer discloses that the net effect of a reinsurance treaty or treaties (or a series of treaties with one or more affiliated reinsurers entered into for the purpose of avoiding the following threshold amount) at any time results in an increase of more than 25 percent to the insurer's surplus as to policyholders, then the insurer shall certify in writing to the OIR that the relevant reinsurance treaty or treaties comply with the accounting requirements promulgated by the OIR pursuant to section 624.610, Florida Statute.</p> <p>The subsection does not apply to contracts of facultative reinsurance, foreign or alien insurers, except those commercially domiciled, or any ceding insurer with surplus as to policyholders that exceeds \$100 million as of the immediately preceding calendar year.</p> <p>Additionally, any ceding insurer otherwise subject to this section with less than \$500,000 in direct premiums written in this state during the preceding calendar year or with less than 1,000 policyholders at the end of the preceding calendar year is exempt from the requirements of this subsection.</p> <p>However, any ceding insurer otherwise subject to this section with more than \$250,000 in direct premiums written in this state during the preceding calendar quarter is not exempt from the requirement of this subsection.</p>
W	<p><b>Insurance Holding Company Registration and Regulation, Florida Statute 628.801 and Rule 690-143, Part V, Florida Administrative Code:</b></p>	<p>Every insurer authorized to do business in this state which is a member of an insurance holding company system shall be subject to regulation with respect to its relationship to such holding company as provided by rule or statute. A current Insurance Holding Company System Registration Statement, Form OIR-D0-516, may be obtained from the Life and Health section of the OIR's website (Also, refer to Note 'H' of "Filing Instructions").</p> <p>A foreign insurer subject to disclosure requirements and standards adopted by statute or regulation in the jurisdiction of its domicile which is substantially similar to those contained in Rules 690-143.046 and 690-143.047, Florida Administrative Code, shall not be required to file with Florida under this section unless requested by this OIR.</p> <p>Chapter 690-143 of the Florida Rules and Regulations defines a holding company system as "two or more affiliated persons, one or more of which is an insurer". An affiliate is defined as "a person that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, the person specified". Control is defined as "possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person". Please review the rule for complete definitions and requirements.</p> <p>A Form F, Enterprise Risk Report, is now part of a holding company filing. Please see section 628.801, Florida Statutes. The title, Holding Company, is a separate filing type in REFS from the annual filing. If Florida is not the lead state for a domestic insurer that is part of a group, the domestic insurer should upload documentation to the Form F component identifying the lead state and when the Form F is expected to be filed with the lead state.</p> <p>ORSA, if applicable, is now part of a holding company filing. Please see note FF for additional details.</p> <p>Corporate Governance Annual Disclosure is now part of a holding company filing. Please see note GG for additional details.</p>

X	<b>Filing Checklist Instructions:</b>	Florida Domiciled Companies and Alien Companies using Florida as their Port of Entry must attach a Filings Checklist to each annual or quarterly filing submitted to the OIR. Fill in the company name, federal employer identification number, and the NAIC company code. Check off the items being submitted and file with the Jurat page through REFS. A Filings Checklist is optional for foreign companies.
Y	<b>Actuarial Opinion of Reserves, Chapter 625, Part 1, Florida Statutes:</b>	<p>A statement of opinion by the insurer's appointed actuary on the adequacy of the reserves and related actuarial items based upon an asset adequacy analysis in accordance with Rule 69O-138.046, Florida Administrative Code, is required. If an opinion filed with the insurer's state of domicile is not consistent with the requirements of Rule 69O-138, Florida Administrative Code, then a copy of the opinion required by the Florida rule shall be submitted no later than March 15.</p> <p>In accordance with section 625.121(3), Florida Statutes, the appointed actuary shall prepare a Regulatory Asset Adequacy Issues Summary, the contents of which are specified in Rule 69O-138.047(3), Florida Administrative Code. Domestic insurers: the Regulatory Asset Adequacy Issues Summary shall be submitted through REFS <u>as part of the annual filing</u> no later than April 1<sup>st</sup>. Foreign insurers: if requested by the OIR the Regulatory Asset Adequacy Issues Summary shall be submitted through REFS. The memorandum shall be made available for examination by the OIR at its request.</p> <p><u>Contact Kyle Collins, ASA, at (850) 413-5054 regarding actuarial questions.</u></p>

Z	<p><b>Audited Financial Reports (ONLY FLORIDA DOMESTIC COMPANIES WILL FILE THROUGH REFS), section 624.4244, Florida Statutes:</b></p>	<p>Only authorized insurers holding a Certificate of Authority are required to file. Entities that do not have a Certificate of Authority, such as accredited reinsurers, are requested to file so that the OIR can carry out its statutory duties. Audited Financial Report must be filed with the NAIC on or before <b>June 1</b> for the preceding year ending December 31. However, the OIR may require an insurer to file an Audited Financial Report earlier than June 1 upon 90 days advance notice to the insurer.</p> <p><b>EXEMPTION:</b> Pursuant to section 624.424(8)(b), Florida Statutes, any authorized insurer "having direct premiums written in this state of less than \$1 million in any calendar year and fewer than 1,000 policyholders or certificate holders of directly written policies nationwide at the end of such calendar year is exempt" from filing an annual audited financial statement for that year pursuant to certain stipulations. Please review this statute carefully. An insurer seeking such exemption must file an affidavit pursuant to the stipulations noted therein on or prior to March 1 following the year to which the exemption applies.</p> <p>The Annual Audited Financial Report shall report the financial position of the insurer as of the end of the most recent calendar year and the results of its operations, cash flows, and changes in capital and surplus for the year then ended in conformity with statutory accounting practices prescribed, or otherwise permitted, by the Department of the state of domicile.</p> <p>The Annual Audited Financial Report shall include the following:</p> <ol style="list-style-type: none"> <li>1. Report of independent Certified Public Accountant;</li> <li>2. Balance sheet reporting admitted assets, liabilities, capital and surplus;</li> <li>3. Statement of operations;</li> <li>4. Statement of cash flows;</li> <li>5. Statement of changes in capital and surplus; and</li> <li>6. The financial statements included in the Audited Financial Report shall be prepared in a form and using language and groupings substantially the same as the relevant sections of the Annual Statement of the insurer filed with the OIR. The financial statements shall be comparative, presenting the amounts as of December 31 of the current year and the amounts as of the immediately preceding December 31.</li> <li>7. The requirements for filing by an accredited reinsurer are found in section 624.610(3)(b)1(d), Florida Statutes.</li> <li>8. Notes to financial statements. These notes shall be those required by the appropriate NAIC Annual Statement Instructions and any other notes required by generally accepted accounting principles and shall also include: <ol style="list-style-type: none"> <li>a. A reconciliation of differences, if any, between the Audited Financial Report and the Annual Statement filed pursuant to section 624.424, Florida Statutes, with a written description of the nature of these differences.</li> <li>b. A summary of ownership and relationships of the insurer and all affiliated companies.</li> </ol> </li> <li>9. The financial statements included in the Audited Financial Report shall be prepared in a form and using language and groupings substantially the same as the relevant sections of the Annual Statement of the insurer filed with the OIR.</li> </ol> <p><b>WHAT ARE THE FILING DEADLINES?</b></p> <ol style="list-style-type: none"> <li>1. Designation of Independent Certified Public Accountant (Only Florida domestic companies) –must be filed by December 31.</li> <li>2. The audited financial report shall be filed with the OIR on or before June 1 for the preceding year ending December 31.</li> <li>3. Request to file on a consolidated basis must be filed by December 31, for the year the exemption is requested. The OIR may accept and grant exemption applications after the end of such calendar year subject to the imposition of an administrative fine provided such application is received by the OIR prior to March 1, immediately subsequent to the end of the calendar year for which such exception is being requested. (Refer to the consolidated or combine Audits Section of these instructions for further details.)</li> </ol>
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**FIVE YEAR ENGAGEMENT MAXIMUM:**

A partner or other person responsible for rendering a report may not act in that capacity for more than five (5) consecutive years. Following any period of service that person shall be disqualified from acting in that or a similar capacity for the same company or its insurance subsidiaries or affiliates for a period of five (5) years. Please refer to Rule 69O-137.002(7)(C), Florida Administrative Code for guidance regarding potential relief from this requirement.

**DESIGNATION OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANT  
(DOMESTIC COMPANIES ONLY--FILE THROUGH REFS)**

Each Florida domiciled insurer required to file an annual audited financial report must, by December 31 of the year subject to audit, register with the Commissioner, Office of Insurance Regulation in writing the name and address of the independent certified public accountant or accounting firm (generally referred to as the "Accountant") retained to conduct the annual audit. In addition, the insurer shall obtain a letter from the accountant, and file a copy with the Commissioner stating the following:

- 1) the accountant is aware of the provisions of the Insurance Code and the Rules and Regulations of the Insurance Department of the state of domicile that relate to accounting and financial matters;
- 2) the accountant will express his/her opinion on the financial statements in terms of conformity to the statutory accounting practices prescribed or otherwise permitted by that Department; and
- 3) the accountant will specify exceptions as he/she may believe appropriate.

**ACCOUNTANT'S LETTER OF QUALIFICATIONS, RULE 69O-137.002,  
FLORIDA ADMINISTRATIVE CODE (DOMESTIC COMPANIES ONLY--FILE  
THROUGH REFS)**

The accountant shall furnish a Letter of Qualification (FILE THROUGH REFS) to the insurer for filing with the Audited Financial Report. The letter shall state:

1. That the accountant is independent with respect to the insurer and conforms to the standards of his or her profession.
2. The background and experience in general, and the experience in audits of insurers, of the staff assigned to the engagement and whether each is an independent Certified Public Accountant.
3. That the accountant understands the annual Audited Financial Report, and his/her opinion thereon will be filed in compliance with this rule, and that the OIR will be relying on this information in the monitoring and regulation of the financial position of insurers.
4. That the accountant consents to the requirements of Rule 69O-137.002(13), Florida Administrative Code - "Definition, Availability, and Maintenance of CPA Work Papers", and that the accountant consents and agrees to make the work papers available for review by the OIR as defined in Rule 69O-137.002(13), Florida Administrative Code.
5. A representation that the accountant is properly licensed by an appropriate state licensing authority.
6. A representation that the accountant is in compliance with the requirements of Rule 69O-137.002(7), Florida Administrative Code - "Qualifications of Independent Certified Public Accountant".

**COMMUNICATION of INTERNAL CONTROL RELATED MATTERS NOTED  
IN AUDIT -- (FILE THROUGH REFS.)**

- (1) **FLORIDA DOMICILED OR COMMERCIALLY DOMICILED  
COMPANIES ARE REQUIRED TO FILE A REPORT ON INTERNAL  
CONTROLS.**
- (2) **FOREIGN COMPANIES ARE REQUIRED TO FILE THE REPORT  
THROUGH REFS ONLY IF THERE ARE SIGNIFICANT  
DEFICIENCIES/REPORTABLE CONDITIONS)**

In addition to the annual audited financial report, each domestic insurer shall furnish the OIR of Insurance Regulation with a written report prepared by the accountant describing significant deficiencies in the insurer's internal control structure noted by the accountant during the audit. The insurer is required to provide a description of remedial actions taken or proposed to correct significant deficiencies, if said actions are not described in the accountant's report. The report on internal controls systems of the insurer shall be filed with the annual audited financial report. If there are no material deficiencies in Internal Controls a letter must be filed attesting to same. (See section 624.424, Florida Statutes and Rule 690-137.002 (11), Florida Administrative Code).

#### **NOTIFICATION OF ADVERSE FINANCIAL CONDITION (FILE THROUGH REFS)**

An insurer who has received a report from the independent certified public accountant that the insurer has materially misstated its financial condition as reported to the Commissioner, Office of Insurance Regulation as of the balance sheet date currently under examination or that the insurer does not meet the minimum capital and surplus requirements of Florida Statutes as of that date, shall forward a copy of the report to the OIR within five (5) business days of receipt of such report and shall provide the independent certified public accountant making the report with evidence of the report being furnished to the OIR. If the independent certified public accountant fails to receive such evidence within the required five (5) business day period, the independent certified public accountant shall furnish to the OIR a copy of its report within the next five business days (Rule 690-137.002 (10), Florida Administrative Code). If the accountant, subsequent to the date of the Audited Financial Report filed, becomes aware of facts which might have affected the report, the accountant shall report such facts to the OIR and the insurer within ten calendar days of discovery.

#### **WRITTEN NOTIFICATION OF CPA DISMISSAL/RESIGNATION (FILE THROUGH REFS)**

If an accountant who was the accountant for the immediately preceding filed Audited Financial Report is dismissed or resigns, the insurer shall within five (5) business days notify the OIR of this event. The insurer shall also furnish the OIR with a separate letter within ten (10) business days of the above notification stating whether in the twenty-four (24) months preceding that event there were:

1. any disagreements (resolved or otherwise) with the former accountant on any matter of accounting principles or practices, financial statement disclosure, or auditing scope or procedure; and
2. which disagreements, if not resolved to the satisfaction of the former accountant, would have caused him/her to make reference to the subject matter of the disagreement in connection with his/her opinion.

Disagreements contemplated herein are those that occur at the decision-making level. The insurer shall also request, in writing, that the former accountant furnish a letter addressed to the insurer stating whether the accountant agrees with the statements contained in the insurers' letter, and if not, stating the reasons for which he/she does not agree.

The insurer shall provide these letters to the OIR (pursuant to Rule 690-137.002 (6)(c)(d), Florida Administrative Code).

#### **CONSOLIDATED OR COMBINED AUDITED FINANCIAL STATEMENTS (FILE THROUGH REFS)**

An insurer may make written application to the Commissioner, Office of Insurance Regulation for approval to file audited consolidated or combined financial statements in lieu of separate annual audited financial statements if the insurer is part of a group of insurance companies which utilizes a pooling or one hundred percent reinsurance agreement that affects the solvency and integrity of the insurer's reserves and such insurer cedes all of its direct and assumed business to the pool. In such cases, a columnar consolidating or combining worksheet shall be filed with the report, as follows:

		<p>A. Amounts shown on the consolidated or combined Audited Financial report shall be shown on the worksheet.</p> <p>B. Amounts for each insurer subject to this section shall be stated separately.</p> <p>C. Non-insurance operations may be shown on the worksheet on a combined or individual basis.</p> <p>D. Explanations of consolidating and eliminating entries shall be included.</p> <p>E. A reconciliation shall be included of any differences between the amounts shown in the individual insurer columns of the worksheet and comparable amounts shown on the Annual Statements of the insurers.</p> <p>F. Application for approval to consolidate is required each year. Application to file on a consolidated or combined audit basis must be received by December 31 for the year the exemption is requested. Applications received after the end of the calendar year but prior to March 1 may be considered but subject to an administrative fine for late filing.</p> <p><b>A COMPLETE REPORT (INCLUDING A-E) MUST BE FILED FOR EACH INSURER IN THE GROUP OPERATING IN THE STATE OF FLORIDA.</b></p> <p>These comments are intended as an aid to you in completing your filing requirements. Reference and review of section 624.424, Florida Statutes and Rule 69O-137.002, should be made for the full requirements.</p>
AA	<b>List of Scrutinized Company Investments (F.S. 624.449)</b>	<p>Florida domestic insurers shall provide a list of investments that the insurer has in companies on the “Scrutinized Companies with Activities in Sudan List” and the “Scrutinized Companies with Activities in the Iran Petroleum Energy Sector List” compiled by the State Board of Administration pursuant to section 215.473(2), Florida Statutes.</p> <p>The insurer’s list must include the name of the issuer and the stock, bond, security, and other evidence of indebtedness.</p>
BB	<b>Risk Based Capital:</b>	<p>Florida domestic insurers are required to file the Risk Based Capital Report through REFS pursuant to section 624.4085(2), Florida Statutes.</p> <p>Foreign and alien insurers are not required to file the report with Florida. Please include the DTA Life RBC Charge, if applicable.</p>
CC	<b>Certificate of Authority Annual License Tax, section 624.501 (3), Florida Statutes:</b>	<p>The certificate of authority annual license tax (also referred to as a certificate of authority renewal fee) must be sent to the following address:</p> <p>FLORIDA DEPARTMENT OF FINANCIAL SERVICES RECEIPTS ACCOUNTING SECTION P.O. BOX 6100 TALLAHASSEE, FL 32314-6100</p> <p>Each insurer is responsible for renewal of its certificate of authority.</p> <p>If the insurer does not receive an invoice by May 1, call (850) 413-5066 to request an invoice. Failure to pay the fee on time could result in revocation of the insurer's certificate of authority or a fine.</p>
DD	<b>Supplemental Actuarial Filings</b>	<ul style="list-style-type: none"> <li>Actuarial Memorandum Related to Universal Life with Secondary Guarantee Policies required by Actuarial Guideline XXXVIII 8D.</li> <li>Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit (Life, Fraternal) (PDF file only).</li> <li>Actuarial Opinion on Synthetic Guaranteed Investment Contracts (Life, Fraternal) (PDF file only)</li> <li>Actuarial Opinion on X-Factors (Life, Fraternal) (PDF file only)</li> <li>Actuarial Opinion required by Modified Guaranteed Annuity Model Regulation (Life, Fraternal) (PDF file only).</li> <li>Financial Officer Certification Related to Clearly Defined Hedging Strategy required by Actuarial Guideline XLIII (Life, Fraternal) (PDF file only).</li> <li>Life PBR Exemption</li> <li>Management Certification that the Valuation Reflects Management's Intent required by Actuarial Guideline XLIII (Life, Fraternal) (PDF file only).</li> </ul>

		<ul style="list-style-type: none"> <li>• Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV (Life, Fraternal) (PDF file only).</li> <li>• Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) (Life, Fraternal) (PDF file only).</li> <li>• Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI (Life, Fraternal) (PDF file only).</li> </ul>
EE	<b>Reinsurance through a Captive Insurance Company</b>	<p>Each licensed insurer that has reinsurance with a captive insurance company must file a report that contains the following information:</p> <ol style="list-style-type: none"> <li>i. An identification of the products ceded to the captive and whether the products are subject to Rule 69O-164.020, Florida Administrative Code, the National Association of Insurance Commissioners (“NAIC”) Valuation of Life Insurance Policies Regulation (“Model #830”), or the NAIC Actuarial Guideline XXXVIII (“AG 38”).</li> <li>ii. The assets of the captive, disclosed in the format of the NAIC annual statement schedules. (Note: The OIR will require Page 2 – Assets to be submitted for each captive, in addition to the applicable investment schedules related to the assets held by the captive.)</li> <li>iii. A stand-alone actuarial opinion or certification identifying the differences between the assets the ceding company would be required to hold and the assets held by the captive.</li> </ol> <p>Please use the form located at <a href="http://www.floir.com/Sections/LandH/is_lh_Exhibits.aspx">http://www.floir.com/Sections/LandH/is_lh_Exhibits.aspx</a>.</p> <p>A component has been added to REFS annual filings called Captive Reinsurance Report. Please upload all information mentioned above to this annual filing component if your company has reinsurance with a captive insurance company.</p> <p>A non-domestic company that falls under Section 532 of the Dodd-Frank Act should upload a copy of what is filed with its state of domicile under the annual filing component Captive Reinsurance Report.</p>
FF	<b>ORSA</b>	<p>Please refer to section 628.8015, Florida Statutes. Insurance Groups and Stand-Alone Companies that are subject to an ORSA filing, and of which Florida is the Lead State, will need to submit a 2024 ORSA filing on or before 12/31/2024. ORSA filings should be submitted as part of holding company filings through REFS, if applicable.</p> <p>Model #505 provides the requirements for completing an annual ORSA and provides guidance and instructions for filing an ORSA Summary Report.</p>
GG	<b>Corporate Governance Annual Disclosure</b>	<p>A Corporate Governance Annual Disclosure is now part of a holding company filing. Please see section 628.8015, Florida Statutes. Holding Company is a separate filing type in REFS from the annual filing. If Florida is not the lead state for a domestic insurer that is part of a group, the domestic insurer should upload documentation to the Corporate Governance Annual Disclosure component identifying the lead state and when the Corporate Governance Annual Disclosure is expected to be filed for the group.</p>
HH	<b>Current Projections</b>	<p>The current projections shall be submitted using Form OIR-D0-2165 with each annual statement due March 1<sup>st</sup>. The pro-forma must be completed entirely, including the balance sheet, P and L, cash flow, LOB Analysis, Nationwide Premium Volume, Authorized Premium by LOB (for Florida only), and Assumptions sheets. Projections should use the Insurer’s historical performance and plan of operations to adequately justify the trends projected. Projections must start with the new reporting year (2025) and extend one additional year (2026). Florida Insurers that only file on a quarterly basis may file projections on quarterly intervals. Florida Insurers that are required to file on a monthly basis must use projections on monthly intervals. The month of January first year for the projections submitted must use actual financial data.</p>