NAIC Electronic Filing Submission Directive – Data Year 2025
Quarterly Filings

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GENERAL INFORMATION

1. Introduction

The purpose of this *NAIC Electronic Filing Submission Directive* is to provide the quarterly statement software vendors with general as well as special instructions that may be helpful in ensuring insurance companies' compliance with electronic filing requirements outlined by the NAIC and participating state insurance departments.

It is the responsibility of insurers to meet all of the NAIC guidelines for data submission. Insurers will be held accountable for continued compatibility and compliance with NAIC requirements.

Insurers are responsible for obtaining any software required to convert and/or translate their internal file structures and formats to those prescribed by the NAIC specifications for electronic filings.

Questions regarding this

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July 1, 2025 — Request for PBR Exemption due to state 7/1 and NAIC 8/15 (Life) (PDF file only)

Aug. 1, 2025 — Communication of Internal Control Related Matters Noted in Audit (Property, Life, Health, Title) (PDF file only) **Note**: This filing is considered an annual filing, however, this will be addressed in the Supplemental Exhibits and Interrogatories with the second quarter filing.

Aug. 15, 2025 — Quarterly Statement Filing as of June 30, 2025 (Property, Life, Health, Title)
Director and Officer Insurance Coverage Supplement – Quarter Ending June 30, 2025 (Property)
Medicare Part D Coverage Supplement – Quarter Ending June 30, 2025 (Property, Life, Health)
Supplement A to Schedule T (Medical Professional Liability Supplement) – Quarter Ending June 30, 2025 (Property)
Trusteed Surplus Statement – Quarter Ending June 30, 2025 (Property, Life)

Request for PBR Exemption due to state 7/1 and NAIC 8/15 (Life) (PDF file only)
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV – Quarter Ending June 30, 2025 (Life) (PDF file only)
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Average Market Value) – Quarter Ending June 30, 2025 (Life) (PDF file only)
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Market Value) – Quarter Ending June 30, 2025 (Life) (PDF file only)
Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method Required by Actuarial Guideline XXXVI – Quarter Ending June 30, 2025 (Life) (PDF file only)
Reasonableness of Assumptions Certification Required by Actuarial Guideline XXXV – Quarter Ending June 30, 2025 (Life) (PDF file only)

Nov. 15, 2025 — Quarterly Statement Filing as of September 30, 2025 (Property, Life, Health, , Title)
Director and Officer Insurance Coverage Supplement – Quarter Ending September 30, 2025 (Property)
Medicare Part D Coverage Supplement – Quarter Ending September 30, 2025 (Property, Life, Health)
Supplement A to Schedule T (Medical Professional Liability Supplement) – Quarter Ending September 30, 2025 (Property)
Trusteed Surplus Statement – Quarter Ending September 30, 2025 (Property, Life)

Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV – Quarter Ending September 30, 2025 (Life) (PDF file only)
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Average Market Value) – Quarter Ending September 30, 2025 (Life) (PDF file only)
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Market Value) – Quarter Ending September 30, 2025 (Life) (PDF file only)
Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method Required by Actuarial Guideline XXXVI – Quarter Ending September 30, 2025 (Life) (PDF file only)

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3. PDF Guidelines

1. Security must not be applied to PDF files by insurance companies, software vendors, or third-party preparers.
2. Scanned images are not allowed except as noted under Miscellaneous Instructions for the Electronic Filing section, part 3-Jurat and organizational chart included in Schedule Y, Part 1.
3. Bar codes are not required in PDF files.
4. All original and refiled quarterly statement PDF files should contain a Jurat page.
5. Each amended quarterly statement PDF file should contain a Jurat page as well as an explanation cover page. The bookmark for the explanation cover page should be named “Amended Explanation”.

MISCELLANEOUS INSTRUCTIONS FOR THE ELECTRONIC FILING

1. For domiciliary jurisdictions that require a reporting entity to submit "wet" signatures on the Jurat page as part of a PDF that is filed with the NAIC, .the reporting entity should follow these steps.
   a) Print the Jurat page.
   b) Have the appropriate individual(s) sign the printed page.
   c) Scan the signed Jurat page, using Optical Character Recognition (OCR) enabled software.
   d) Replace the original Jurat page with the scanned/signed Jurat page.

2. An insurer's quarterly electronic filings submitted to the NAIC must be consistent with the filings submitted to the insurer's domiciliary state.

3. All quarterly statement amounts must be reported in whole dollars or with "000" omitted, with no reporting of cents unless otherwise noted in the NAIC's electronic filing specifications.

4. All phone numbers must be reported on the electronic filing in the format xxx-xxx-xxxx-xxxxxxx (representing the area code, the seven-digit phone number, and up to a seven-digit extension number). If there is no extension number, the last seven digits of the phone number field must be left blank. If the extension number has fewer than seven digits, the extension must be left-justified, with the remaining spaces left blank.

   Example: (913) 383-1286 ext. 500 should be reported as 913-383-1286-500

   Note: Foreign numbers must be adapted to the described format.

5. On the electronic filing, names must be reported in the following order, with no punctuation.

   Last Name First Name Middle Name Suffix

   Note: The Middle Name field can be empty for all required names. A Suffix is not required for all names.

6. ZIP files should not contain empty PDFs.

7. A given ZIP file should contain only those files that are due on a specific filing date. For example: A Quarter 1 ZIP file should contain only the files that have a filing date of May 15; it should not contain files that have a filing date of August 15.

8. If an insurer has nothing to report in a text field of a required line, the field should be empty on the electronic filing. **[An exception to this guideline is Column 1 (Active Status) of Schedule T for every statement type. An appropriate response must appear in every open cell of Column 1 of Schedule T.]**

9. Tables that consist of both variable line ranges and fixed lines must not contain zero-filled detail lines on the electronic filing.

10. The following are guidelines regarding the electronic filing of quarterly supplements.
    A supplement should be filed **only** if it is applicable to the reporting company.
    If a company answers "NO" to the Supplemental Interrogatory that pertains to a particular supplement, zero-filled or blank filings for that supplement **should not** be filed electronically.

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SPECIAL INSTRUCTIONS FOR JURAT TABLES

Some of the Jurat information that is to be reported on a given electronic filing may not apply to a particular reporting entity. However, reporting entities **must report** the following Jurat information on their quarterly electronic filings.

NAIC Company Code
FEIN
State of Domicile or Port of Entry (2-letter abbreviation)
Country of Domicile (3-letter abbreviation) (**Note:** The 2-letter abbreviation "US" should be used to represent "United States of America".)
Submission Filing Type Code (Original, Refile, Amended)
Full Company Name
Internet Website Address for Statutory Home Office
Note: If a company does not have an Internet Website Address, the company should enter N/A for this item.
Name and Phone Number for the following: Statutory statement contact, Diskette contact, Policyowner relations contact, Government relations contact, Market conduct contact, Cyber-security contact, Life insurance policy locator contact (for Life/Fraternal and Health filings) and Life experience data contact (for Life/Fraternal filings).
Name and Title of at least two individuals who sign the Jurat
Vendor Name
Vendor Version Number
Vendor Code
Licensing Information

Note: "Other officer" information must begin on fixed Line 05; "Additional other officers" information must begin on variable Line 05.01, continuing on consecutive variable lines as necessary. "Director or trustee" information must begin on fixed Line 06; "Additional directors or trustees" information must begin on variable Line 06.01, continuing on consecutive variable lines as necessary.

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SPECIAL INSTRUCTIONS FOR PROPERTY ELECTRONIC FILINGS

NOTES TO FINANCIAL STATEMENT – Note 13 – Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

For Lines 13K0001-13K9996, Column 1 (Description) does not apply.

Note: All YES/NO responses are to be spelled out and in all CAPS.

NOTES TO FINANCIAL STATEMENT – Note 14 – Liabilities, Contingencies and Assessments

For Line 14D02 (Range of claims), the valid entries for Column 4 (Claims) are A (for 0-25 claims), B (for 26-50 claims), C (for 51-100 claims), D (for 101-500 claims), and E (for more than 500 claims).

For Line 14D03 (Indicate whether claim count information is disclosed per claim or per claimant), the valid entries for Column 4 (Claims) are F (for per claim) and G (for per claimant).

NOTES TO FINANCIAL STATEMENT – Note 15 – Leases

For Lines 15A02A1-15A02A7, the line captions are as follows.

Line 15A02A1 – 2025 (y

SCHEDULE T

The valid responses for Column 1 (Active Status) are as follows.

1. L (for Active Licensed or Chartered)
2. R (for Active Registered non-domiciled RRGs)
3. E (for Active Eligible or approved to write surplus lines in state other than state of domicile)
4. Q (for Active Qualified or accredited reinsurer)
5. D (for DSLI – Active Domestic Surplus Lines Insurer)
6. N (for None of the above – not allowed to write business in state)

SPECIAL INSTRUCTIONS FOR HEALTH ELECTRONIC FILINGS

NOTES TO FINANCIAL STATEMENT – Note 13 – Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

For Lines 13K0001-13K9996, Column 1 (Description) does not apply.

Note: All YES/NO responses are to be spelled out and in all CAPS.

NOTES TO FINANCIAL STATEMENT – Note 14 – Liabilities, Contingencies and Assessments

Lines 0500001-0599998 – Property/Casualty – affiliates
Lines 0600001-0699998 – Property/Casualty – non-affiliates

SCHEDULE T

The valid responses for Column 1 (Active Status) are as follows.

1. L (for Active Licensed or Chartered insurance carrier or domiciled RRG)
2. R (for Active Registered non-domiciled RRGs)
3. E (for Active Eligible reporting entities eligible or approved to write surplus lines in state)
4. Q (for Active Qualified or accredited reinsurer)
5. N (for None of the above – not allowed to write business in state)

Lines 1 through 57 – One of the above responses must appear in **every** cell of Column 1 of Schedule T.

SCHEDULE T (Footnote)

Line A – Active Status Counts: These counts should be the sums of Schedule T – column 1, and equal 57.

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

Line 2 – The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter. (See page 7 of this directive.)

MEDICARE PART D COVERAGE SUPPLEMENT

This table is to be filed only if the reporting company offers Medicare Part D stand-alone coverage.

The information in this table should be reported year-to-date.

SCHEDULE T

The valid responses for Column 1 (Active Status) are as follows.

1. L (for Active Licensed or Chartered)
2. R (for Active Registered non-domiciled RRGs)
3. E (for Active Eligible or approved to write surplus lines in state)
4. Q (for Active Qualified or accredited reinsurer)
5. N (for None of the above – not allowed to write business in state)

Lines 1 through 57 – One of the above responses must appear in **every** cell of Column 1 of Schedule T.

SCHEDULE T (Footnote)

Line A – Active Status Counts: These counts should be the sums of Schedule T – column 1, and equal 57.

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

Line 1 – The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter. (See page 7 of this directive.)