

1. It is the first time our company is participating; is there a charge we have to pay?

No. The NAIC is not charging a fee for the 2021 mortality experience data call.

2. How frequently will these data calls be done going forward?

Annually. The *Valuation Manual* specifies that the data call will go out in Q2 each year, initial data submissions are due September 30th and any corrections to data file are due by December 31st.

3. Is group business excluded?

Yes. VM-51 Section 2.B states: "The data for this statistical plan is the [emphasis added] ordinary life line of business."

4. Can you list which types of products should be excluded from the data submission? Earlier, it was suggested that Simplified Issue, Guaranteed Issue, COLI/BOLI should not be submitted. Anything else?

VM-51 Section 2.B states: "The ordinary life line of business does not include separate lines of business, such as SI/GI, worksite, individually solicited group life, direct response, final expense, pre-need, home service, credit life, and corporate-owned life insurance (COLI)/bank-owned life insurance (BOLI)/charity-owned life insurance (CHOLI)."

5. The item 19 Description says, "Exclude from contribution: spouse and children under family policies or riders." Does this section suggest spouse and/or child riders under family policies or general riders should be excluded? Is this specified in the

7. Is the company administrator the person responsible for VM-51 or an existing contact person at the company with a NAIC login?

It can be the person responsible for VM-51, but it does not have to be. The primary purpose for the company administrator is to monitor/maintain who can submit data and who can access the company's data submissions. Because of employee turnover and/or reassignment of duties, we wanted someone within the company to maintain that access. It is important to note if the company administrator leaves the company or changes responsibilities, someone from the company must notify the NAIC and designate a new administrator.

If the company administrator already has an NAIC login, then we will confirm they have the necessary permissions for RDC. If the company administrator does not have an NAIC login, we will request one for them. They will receive an email with their login information and a temporary password.

8. Can my company assign 2 administrators, so that one can be a backup for the other?

Currently, the RDC system is only set up for one company administrator at a time.

9. We combined with a smaller fraternal years ago. That company doesn't exist any more. We maintain a separate administration system for them. Since we didn't directly write that business, should it be excluded?

If you are reporting that business in your annual statement then you would now be considered the direct writer for that block. You mentioned that this block of business is maintained on a separate administration system. This may be a situation where a hardship exemption would apply. Please email us at experience_reporting@naic.org if you would like to request a hardship exemption.

10. If a group merged two affiliates in 2020, how would that impact 2018 and 2019 reporting?

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12. For the purpose of calculating the \$10 million of individual premium to determine an affiliate's exclusion, should SI, GI, COLI, etc. be excluded from that total?

Yes. Any business that is out of scope should be excluded from the total premium.

13. For the purpose of calculating the 10m premium limit, what premium measure should be used? Premium paid during the year, premium in force, or something else?

The premium measure is the total direct collected premium.

14. To be clear on the affiliate selection level is at the level of the NAIC company code (Blue Book submission level)? Are there different rules for TPAs that might exist within a single NAIC company code?

The NAIC has prepared a policy and procedures document outlining how data should be handled when a third-party administrator is involved. It can be found on our website and is titled "VM-51 Reporting when Business is Administered by Third-parties." A future webinar will be dedicated to reviewing this topic.

Recently, an amendment to the *Valuation Manual* was exposed that will make some change to allow this process to be more flexible. Those changes will not be in effect, however, until 2022. Anyone who would like to know more about this amendment, can email us at experience_reporting@naic.org.

15. My company submits VM-51 data to MIB on an annual basis already. How is this NAIC data call different from that?

In the past,

16. Is there a plan to align VM-51 with the NYDFS submission at some point in the future? It's cumbersome to prepare two submissions that are almost identical.

There has been some discussion on this in the past. Any changes to VM-51 would require an amendment be filed. There are no immediate plans to do this.

Also, keep in mind that the NAIC is bound by VM-51 and the amendment process takes time. New York has much more flexibility with their data call and can change things much more quickly. Even if the NAIC amended VM-51 to align with New York, there is no guarantee that New York would not make other changes.

17. Is having to file data call to New York DFS a reason for requesting exemption from the NAIC VM-51 data call?

No.

18. On slide 20, for the submission templates, what is the format: Excel, Word, comma-delimited csv, etc.