

LOUISIANA DEPARTMENT OF INSURANCE

2020 ANNUAL STATEMENT MAILOUT (FOR YEAR ENDED 12/31/2020)

Please mail through U. S. Mail, or email, your completed actuarial compliance package to:

Rod Friedy, FSA, MAAA
Director of Life Actuarial Services
Louisiana Department of Insurance
Office of Financial Solvency
Post Office Box 94214
Baton Rouge, La 70804-9214

Inventory Checklist

<u>Item</u>	<u>Num of Pages</u>	<u>Form</u>
1	_____	Plan Code Definitions
2	_____	Plan Summary
3	_____	Five Year Trend Study
4	_____	Certification of Trend Study
5	_____	Affirmation of Insurance In Force
6	_____	Statement of Actuarial Opinion
7	_____	Exemption from asset adequacy Worksheet
8	_____	Non-Guaranteed Element Statement
9	_____	Universal Life Certification
10	_____	Exemption from PBR Certification
11	_____	Registered Policy Certification
12	_____	Letter appointing actuary (If not previously submitted)
13	_____	Other

LOUISIANA DEPARTMENT OF INSURANCE (LDI)
ACTUARIAL PACKET
DOMESTIC LIFE, HEALTH & HMO INSURANCE COMPANIES
FOR YEAR ENDING DECEMBER 31, 2020

These requirements apply to all domestic life, industrial, service, non-profit, fraternal, health indemnity and HMO insurance companies.

To complete the LDI annual actuarial compliance submission. **(Email submissions, in whole or in part, will be accepted.)** Please note the following:

1. File this data at the same time as your annual statement. Filings after March 1, 2021, are late and subject to fine and/or other regulatory action.
2. Non-profit companies with no industrial business are exempt from filing actuarial opinions and data for the year ending December 31, 2020. All non-profit companies with industrial business must file all required actuarial data.
3. ALL OTHER DOMESTIC LIFE COMPANIES MUST FILE ALL REQUIRED DATA, INCLUDING THE ACTUARIAL OPINION!!! Attach the actuarial opinion to page 1 of the annual statement and include a copy with the actuarial compliance submission.
4. All domestic life companies should be familiar with LDI Regulation 47 (re-enacted). This regulation can be obtained from your appointed actuary or by contacting Rod Friedy, FSA, MAAA, Director of Life Actuarial Services, at LDI (Phone (225) 342-4656 or email: Rod.Friedy@ldi.la.gov). Your appointed actuary will assist you with the specifics of the December 31, 2020, filing requirements.
5. All HMO's should include information that supports the determination of both the covered and uncovered claim liability as presented in the HMO-Associated Edition Annual Statement.
6. The LDI actuarial department will review of all domestic life insurance company December 31, 2020, valuations in 2021, and issue valuation certificates.
7. Retain copies of all records in your office for six years.

ATTN: ALL APPOINTED ACTUARIES

LOUISIANA ACTUARIAL ISSUES UPDATE

DECEMBER 31, 2020 REQUIREMENTS

Principle based reserves (PBR) came into effect for new business in 2016. The standard was optional January 1, 2017, and mandatory January 1, 2020. Louisiana companies can test the standard for exemption from PBR and certify to the expectation of meeting the exemption standard using the enclosed submission form. The company must be prepared to support their PBR exemption claim upon request by the Department.

The 2017 CSO Mortality Table became effective for new issue reserves and cash values, optional January 1, 2017, and mandatory January 1, 2020. Supporting documentation is found in VM-20. However, our position remains that neither this table, or the 2001 CSO Mortality Table, will produce adequate reserves for industrial, pre-need and other home service products. **Therefore, the mortality standard for this product class remains the 1980 CSO Ultimate Mortality Table (as discussed below).**

In 2014, the Louisiana Department of Insurance (LDI) amended Rule 8 to recognize the 2012 IAR Mortality Table. Commencing January 1, 2015, this table is the new valuation standard for new individual annuity and pure endowments contracts. Rule 8 also recognizes the 1994 GAR Mortality Table for group annuity issues commencing January 1, 1999.

LDI promulgated Regulation 96 in October of 2008, Regulation 91 in March of 2007, Regulation 47 (re-enacted) in July of 2005 (with a clarification modification in December of 2010), Regulation 84 in September of 2005 and Regulation 85 in September of 2005. Regulation 84 will be amended in 2021. These regulations are discussed herein.

1. Regulation 96

Regulation 96 established the 1980 CSO Ultimate Mortality Table as the valuation standard for industrial, pre-need and other home service products commencing January 1, 2009.

LOUISIANA ACTUARIAL ISSUES UPDATE

2. Regulation 91

Regulation 91 recognizes, presents and permits the use of mortality tables by life insurance companies that reflect the differences in mortality between preferred and standard lives in their statutory reserve determinations. **Note, we are granting an exemption from the mortality statistics-reporting requirement for 2020, as per the enclosed letter.**

3. Regulation 47 (re-enacted)

Regulation 47 (re-enacted) is Louisiana's version of the NAIC's April 2010 Actuarial Opinion and Memorandum Regulation model (MDL-822). Regulation 47 (re-enacted) varies from the NAIC model so as to allow for the special regulatory characteristics of our Louisiana domestics. These special considerations are discussed further in the attached letter addressed to all life insurance company appointed actuaries, dated November 21, 2005. **All Louisiana multi-state domestic insurance companies are subject to the asset adequacy analysis requirement.**

4. Regulation 84

Regulation 84 was Louisiana's version of the 2001 CSO Mortality Table Model Regulation. Since the 2017 CSO Mortality Table supplanted the 2001 CSO Mortality Table, this regulation will be amended in 2021 to reflect this fact.

5. Regulation 85

Regulation 85 is Louisiana's version of Regulation XXX.

6. Actuarial Guideline XXXII

This guideline mandates the explicit recognition of the immediate payment of claims (IPC) reserve.

7. Other Actuarial Guidelines

All other Actuarial Guidelines are as per the NAIC Accounting Practices and Procedures Manual.

**LOUISIANA DEPARTMENT OF INSURANCE (LDI)
DECEMBER 31, 2020, APPOINTED ACTUARY NOTIFICATION**

REGULATION 47 (RE-ENACTED)

LDI Regulation 47 (re-enacted) requires that each company submit a statement of actuarial opinion (SAO), signed and dated by the appointed actuary. The prior regulation required the filing to be either a Section 7 or Section 8 SAO. Regulation 47 (re-enacted) requires an asset adequacy analysis unless the company meets our specified exemption criteria. (We specify the exemption criteria each year.) **For December 31, 2020, the specified exemption is equivalent to the former Section 7 Exemption (now called an exemption from asset adequacy).** Multi-state domestic life insurance companies **must** complete the **standard** asset adequacy analysis. Companies requesting an asset adequacy exemption must complete the 2020 “Exemption from Asset Adequacy Testing” form.

STATEMENT OF ACTUARIAL OPINION

The SAO should, as a minimum, attest to the correctness of the following:

- (i) Aggregate reserves for policies and contracts included in Exhibit 5.
- (ii) Aggregate reserves for policies and contracts included in Exhibit 6.
- (iii) Aggregate reserves for deposit funds, premiums, dividend and coupon accumulations and supplementary contracts not involving life or disability contingencies included in Exhibit 7.
- (iv) Policy and Contract Claims-Liability end of Current Year included in Exhibit 8, Part 1.

The SAO is due March 1, 2021. However, if LDI grants an asset adequacy deferral (to August 1, 2021) then, in the interim, a non-asset adequacy SAO should be completed and submitted by March 1, 2021.

STATEMENT OF RELIANCE

Anyone who completes work that supports the SAO must submit to the appointed actuary a Statement of Reliance. The Statement of Reliance should identify the scope of the work and the person responsible for it. The person responsible for the work should sign and date the statement.

FIVE YEAR TREND STUDY

The appointed actuary must certify to the company’s Five Year Reserve Trend Study. This study must provide summary totals by mortality table, interest rate and reserve method for yearend 2020. **Any trend distortion resulting from a change in valuation basis should detailed in an explanatory note.**

The study should include, as appropriate, the following:

- (a) Number of policies.
- (b) Gross premium.
- (c) Net premium.
- (d) Amount of insurance.
- (e) Statutory reserve.
- (f) 100% reserves if different from (e).
- (g) Reserve per one thousand dollars of insurance.
- (h) Gross premium per one thousand dollars of insurance coverage.

NOTICE TO THE APPOINTED ACTUARY

PLAN STUDY

The company must submit a Plan Study that details the number of policies, coverage amount and reserves by plan code. The insurance coverage and statutory reserve totals must correspond to that shown in the annual statement.

PLAN CODE DEFINITIONS

The company must submit a Plan Code Definition document that details type of coverage, statutory reserve basis and premium payment structure for each unique plan code.

AFFIDAVIT OF INFORCE

The company must submit an Affidavit of Inforce that attests to the accuracy of the company's insurance inforce. A responsible company official must sign it. This document must be kept on file for six years and available to LDI on request.

SMALL GROUPS AND COMMUNITY RATING REQUIREMENTS

There are no longer small group health insurer community rating compliance annual certification requirements.

NON-GUARANTEED ELEMENT STATEMENT

The Non-Guaranteed Element Statement must be submitted.

UNIVERSAL LIFE STATEMENT

Louisiana's Regulation 36 pertains to universal life policies. The associated document must be completed.

PBR EXEMPTION STATEMENT

The company must submit a PBR Exemption Statement. The statement attests to the company's belief that they will meet the 2021 exemption standard.

REGISTERED POLICIES

As per LRS 22:809, the company must submit a Registered Policy statement.

**LOUISIANA DEPARTMENT OF INSURANCE
LIFE AND HEALTH COMPANIES
PLAN SUMMARY FOR YEAR ENDING DECEMBER 31, 2020**

COMPANY

INSURANCE TYPE: [Industrial] [Ordinary] [Credit] [Group]

RESERVE BASIS (or TOTAL PAGE)

1 PLAN CODE	2 POLICY COUNT	3 GROSS PREMIUM	INSURANCE IN FORCE OR ANNUITY FUND VALUE	5 100% RESERVES	6 RESERVES	7 RES/THOUS
A						
B						
C						
D						
E						
F						
G						
H						
I						
J						
K						
L						
TOTALS						

LOUISIANA DEPARTMENT OF INSURANCE
LIFE AND HEALTH COMPANIES
FIVE YEAR TREND STUDY FOR YEAR ENDING DECEMBER 31, 2020

COMPANY

INSURANCE TYPE: Industrial, Ordinary, Credit, Group, Annuity, Universal Life Circle one

Supple Contr., Accidental Death, Dis. Act, Dis. Dis, Misc.

Exh 5, Exh 6, Exh 7, Exh 8, Pt 1

Burial, Cash INDUSTRIAL COMPANIES ONLY - Circle one

1 YEAR	2 POLICY COUNT	3 GROSS PREM.	INSURANCE IN FORCE OR ANNUITY FUND VALUE	5 RES.	6 RES./ THOUS	7 110% RESERVES	8 YEAR
RESERVES BASIS (or TOTALS)							
20							20
19							19
18							18
17							17
16							16
RESERVES BASIS (or TOTALS)							
20							20
19							19
18							18
17							17
16							16
RESERVES BASIS (or TOTALS)							
20							20
19							19
18							18
17							17
16							16

Louisiana Department of Insurance

RESERVE TREND STUDY CERTIFICATION

I hereby certify that _____ Insurance Company has been furnished with a Five Year Reserve Trend Study as required by the Louisiana Insurance Department. As of December 31, 2020, the grand total insurance in force (before adjustments for reinsurance) is \$_____ and the total reserves (Exhibit 5 - after adjustments for reinsurance) is \$_____. This latter value should be equal to corresponding items in the Company's annual statement (page 22, line 23, column 1 and page 3, line 1).

Date

Appointed Actuary

Louisiana Department of Insurance

AFFIRMATION OF INSURANCE IN FORCE

I hereby affirm that the listings and summaries of policies in force for _____ Life Insurance Company as of December 31, 2020, prepared for and submitted to _____

NAME OF APPOINTED ACTUARY

were prepared under my direction and, to the best of my knowledge and belief, are substantially accurate and complete.

These detailed in force listings, including related summaries, will be kept for a period of six years in the files at the Administrative Office of the Company and will be made available to the Office of the Commissioner of Insurance upon request.

DATE

SIGNATURE

NAME

TITLE OF COMPANY OFFICER

LOUISIANA DEPARTMENT OF INSURANCE

INSTRUCTIONS FOR RECORDING DETAILED RESERVES FOR LIFE AND HEALTH COMPANIES

Each company is required to maintain a policy data file consisting of one record for each policy issued (seriatim) in an electronic data processing medium. As a minimum, each policy record should include the following items of information:

Name of Insured
Policy Number
Base or Rider
Policy Issue Date
Status (active, lapsed, surrendered, RPU, ETI, expired, claim)
Paid to Date
Expiry Date
Plan Code
Sex(es)
Date(s) of Birth
Gross Modal Premium
Frequency of Premium Payment
Face Amount
Insurance in force
Units
Reserve
Fund Value
Cash Value
Valuation Method
Mortality Table
Valuation Interest Rate

LOUISIANA DEPARTMENT OF INSURANCE
2020 Annual Statement Actuarial Review - Domestic Life Insurance Company

NAIC
NUMBER

INSURANCE COMPANY NAME

EXEMPTION FROM ASSET ADEQUACY TESTING				
FOR YEAR ENDING DECEMBER 31 2020 for _____				
Line No.	Annual Stmt	Item Description	2020	
1	Page 2, L 28	Admitted Assets		
2		Category Class		
3	Page 3, L 38	Capital + Surplus		
4	Page 2, L 12	Cash + Invested assets		
5		Ratio #1 (L3 ÷ L4)		
6A	Exh. 5	Annuity Reserves		
6B	Exh. 7, L 14	Deposit Funds		
7		Ratio #2 (L6A+L6B) ÷ L1		
8	Page SI07 11.3-11.6, col. 7	Book value of non-investment grade bonds		
9		Ratio #3 (L8 ÷ L3)		
Has the NAIC Analyst Team designated the company category A or B				
Summary Information:				
		Exemption Criteria		
Category Class		A	B	C
Ratio #1	>	.10	.07	.05
Ratio #2	<	.30	.40	.50
Ratio #3	<	.50	.50	.50
Is the Company Exempt? Y/N				
Test: The Company is exempt if Ratio #1 is greater than the exemption criteria, Ratios #2 & #3 are less than the exemption criteria and the company does not have an Analyst Team designation.				

Note : The Commissioner may specifically indicate that the exemption is not to be allowed.

Category A - Admitted assets of \$20,000,000 or less

Category B - Admitted assets of \$20,000,000 to \$100,000,000

Category C - Admitted assets of \$100,000,000 to \$500,000,000

Category D - Admitted assets of over \$500,000,000

LOUISIANA DOMESTIC AND FOREIGN LIFE INSURANCE COMPANIES

UNIVERSAL LIFE POLICIES

Please complete the following form:

Name of Company: _____

NAIC Number: _____

1. As of December 31, 2020, did your company have any universal life policies in force as defined in Louisiana Regulation 36, _____ YES _____ NO

2. If the answer to (1) is yes, is your universal life business reserved in accordance with Louisiana Regulation 36, _____ YES _____ NO

3. If the answer to (1) is yes, then please attach a list of your universal life plan codes from your plan study.

I hereby certify that the above information is correct.

Appointed Actuary for the Company

Date

LOUISIANA DOMESTIC AND FOREIGN LIFE INSURANCE COMPANIES

NON-GUARANTEED ELEMENT STATEMENT

Please complete the following form:

Name of Company: _____

NAIC Number: _____

1. Did your company have any policies in force on December 31, 2020, with non-guaranteed elements, _____ YES _____ NO?

2. If the answer to (1) is yes, please complete and attach a non-guaranteed element statement.

I hereby certify that the above information is correct.

Appointed Actuary for the Company

Date

LOUISIANA DOMESTIC LIFE INSURANCE COMPANIES

PRINCIPLE BASED RESERVES (PBR)

Please complete the following form:

Name of Company: _____

NAIC Number: _____

Is your company planning to file for an exemption from PBR in 2021 based on your company meeting the PBR exemption requirement, _____ YES _____ NO?

I hereby certify that the above information is correct.

Appointed Actuary for the Company

Date

LOUISIANA DOMESTIC AND FOREIGN LIFE INSURANCE COMPANIES

REGISTERED POLICIES

Please complete the following form:

Name of Company: _____

NAIC Number: _____

1. Any issued Registered Policies as defined in La. R.S. 22:809, ___YES ___ NO.

2. If the answer to the above is yes, then complete the following:

a. Plan codes offering registered policies _____ .

b. Number of registered policies issued _____ .

c. Total in-force of registered policies _____ .

d. Statutory reserves of all registered policies as of 12/31/2020 _____ .

3. Have you deposited with the Commissioner of Insurance funds equal to the legal reserve for the registered policies ___YES ___ NO

I hereby certify the above information is correct.

Officer of the Company

Date



LOUISIANA DEPARTMENT OF INSURANCE

JAMES J. DONELON
COMMISSIONER

December 16, 2020

To: All Domestic and Foreign Louisiana Life Insurance Companies

In accordance with Section 11909C of Louisiana's Regulation 91: "Unless exempted by the Commissioner, every authorized insurer using the 2001 CSO Preferred Class Structure Table shall annually file with the Commissioner, with the NAIC, or with a statistical agent designated by the NAIC and acceptable to the Commissioner, statistical reports showing mortality and such other information as the Commissioner may deem necessary or expedient for the administration of the provisions of this regulation..."

Notice is hereby given that the Louisiana Department of Insurance intends to grant exemption from the annual statistical report filing requirement for the calendar year ending December 31, 2020. It is noted that in 2021, we will be reviewing how Regulation 91 applies to the 2017 CSO mortality table.

Please feel free to contact us if any further clarification is needed.

Sincerely,

Rodney E. Friedy, FSA, MAAA
Director of Life Actuarial Services



LOUISIANA DEPARTMENT OF INSURANCE
JAMES J. DONELON
COMMISSIONER

December 9, 2020

To: All Louisiana Domestic Company Life Insurance Company Appointed Actuaries

Under the current prevailing interest rate climate, the Society of Actuaries dynamic statutory valuation interest rate generating formula produced interest rates for statutory valuation of 3% and a cash surrender value of 4% for new life insurance policies with lifetime benefits commencing January 1, 2021.

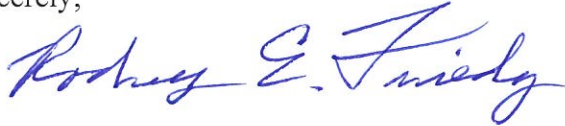
However, under the Louisiana Insurance Code there are peculiarities. LRS 22:753B(3)(a) states: "The interest rates used in determining minimum standard for the valuation of the policies...shall be the calendar year statutory valuation interest rates, as defined in this paragraph, or at the option of the insurer,..., the rate ... of interest provided in Paragraphs (1)...of this Subsection." The "Paragraphs (1)" reference is to LRS 22:753B(1) which states: "Except as otherwise provided in Paragraphs...(3) of this Subsection...the minimum standard for the valuation...four and one-half percent interest for policies...other than annuities and pure endowment contracts...". Further, the minimum non-forfeiture interest rate is set to 125% of the minimum statutory valuation interest rate rounded up to the next 0.25%. This results in 5.75% value. Thus, the Louisiana Insurance Code codifies a floor on the statutory minimum valuation and cash surrender value interest rate.

Commencing January 1, 2013, the Society of Actuaries dynamic valuation interest rate generator determined that the maximum statutory valuation interest rate for newly issued life insurance business with lifetime benefits to be 3.5%, supplanting the previous 4% standard. Given that the change in statutory rate to 3.5% was based on the prevailing low bond earnings, and that such low bond earning rates would also apply to the investments of limited underwritten business, it was deemed necessary to lower the statutory maximum interest rate for limited underwritten business to 4% from 4.5%. Thus, commencing January 1, 2013, for all newly issued maximum benefit period limited underwritten policies, the minimum statutory valuation standard was set to the 1980 CSO and interest of 4.0% for statutory reserves and 5.0% for cash surrender values.

Since the newly introduced statutory valuation and cash value interest rates set to take effect January 1, 2021, would necessitate actuarial pricing costs, thereby causing economic hardship to some of our home service companies, we, at the Louisiana Department of Insurance (LDI), will defer any statutory valuation and cash value interest rate change for limited underwritten business in 2021.

In summary, the LDI statutory minimum valuation standard for new home service and other limited underwritten business remains the 1980 CSO mortality table with interest of 4.0% for valuation and 5.0% for cash surrender values. Multi-state companies must comply with the valuation standards of their foreign states. Further, the new lower interest rates will apply to fully underwritten new ordinary life insurance business commencing January 1, 2021.

Sincerely,

A handwritten signature in blue ink that reads "Rodney E. Friedy". The signature is written in a cursive style with a large, prominent initial 'R'.

Rodney E. Friedy, FSA, MAAA
Director of Life Actuarial Services