

Substantive and Nonsubstantive Exposures				
Reference No.	Issue Paper / SSAP No. / Appendix	Title	Description	Additional Commentary
Exposures with Comment Deadline of January 31, 2020				
2018-26	SSAP No. 5R SSAP No. 97	SCA Loss Tracking – Accounting Guidance	Exposed revisions expand guidance regarding financial guarantees and the use of the equity method for when losses exceed an SCA's equity value. With these revisions, the equity value of an SCA would not go negative, and guarantee liabilities would be reported to the extent that there is a financial guarantee or commitment. The "Illustration of the Application of INT 00-24" will be inserted into SSAP No. 97 as Exhibit F.	At the December 7, 2019, NAIC Fall Meeting, the SAPWG re-exposed revisions to SSAP No. 5R— <i>Liabilities, Contingencies and Impairments of Assets</i> and SSAP No. 97— <i>Investments in Subsidiary, Controlled and Affiliated Entities</i> with requested changes from interest parties. There were no substantive changes to the exposure draft at this meeting. In addition the SAPWG did not want to require adoption so close to year-end.
2018-38	SSAP No. 55	Prepaid Providers	Exposed revisions separate the guidance by product type and emphasize guidance that loss and loss adjusting expense liabilities are established regardless of payments to third parties (except for capitated health claim payments). The revisions emphasize existing guidance that claims that related liabilities are not recognized as paid until the losses are paid to claimants or claims are adjusted.	The exposure draft was re-exposed at the December 7, NAIC Fall Meeting at the request of interested parties. Interested parties wanted to see the breakouts described to the left.
2019-04	SSAP No. 32 Issue Paper	Investment Classification Project – Preferred Stock	Exposed a revised issue paper and a draft substantively-revised SSAP to revise the guidance for preferred stock under the Investment Classification Project.	At the December 7, 2019, NAIC Fall Meeting, the SAPWG exposed Issue Paper No. 1XX— <i>Preferred Stock</i> to revise the definitions, measurement guidance and impairment guidance for preferred stock pursuant to the investment classification project. The most current exposure draft has been updated for most of the received comment letters.
2019-08	SSAP No. 51R SSAP No. 52	Reporting Deposit-Type Contracts	Exposed revisions include footnote excerpts in the reporting exhibits to aggregate deposit-type contracts captured in Exhibit 5 – Life Contracts and an inquiry as to whether a similar footnote would be beneficial for Exhibit 6 – Accident and Health Contracts. Additionally, feedback regarding instruction clarifications for Exhibit 7 – Deposit-Type Contracts has been requested.	The exposure proposes a new footnote in Exhibit 5 to identify those contracts with no morbidity or mortality risk. Note that this is a concurrent exposure with the Blanks Working Group.
2019-12	SSAP No. 68 SSAP No. 97	ASU 2014-17, <i>Business Combinations - Pushdown Accounting</i>	Re-exposed agenda item to allow additional time for specific examples of pushdown accounting to be provided by interested parties, as well as consider comments received on pushdown.	At the August 3, 2019, NAIC Summer Meeting, the SAPWG exposed this agenda item with a request for comments on the three options listed below. Additionally, to ensure that goodwill resulting from an insurance reporting entity's acquisition of an SCA when pushdown is applied is captured within the goodwill admittance limitation, the exposure includes limited revisions to reference this goodwill in SSAP No. 68— <i>Business Combinations and Goodwill</i> , paragraph 9. The options include: 1. Complete rejection of pushdown accounting. 2. Permission to use pushdown for all non-insurance entities. 3. Permit pushdown if elected by SEC Registrants, excluding non-insurance entities. At the December 7, 2019, NAIC Fall Meeting the SAPWG re-exposed this draft with a request for examples of push-down accounting from interested parties. No substantive changes were made to the proposed treatment.
2019-14	SSAP No. 97	Allocation of Goodwill	Exposed revisions require assignment of purchase price and goodwill to entities within downstream holding companies with disclosure of the allocation of goodwill.	At the December 7 2019, NAIC Fall Meeting, the SAPWG exposed revisions to SSAP No. 97— <i>Investments in Subsidiary, Controlled and Affiliated Entities</i> , to clarify that the "assignment" of goodwill is a disclosure element, with revisions to the disclosure requirements for downstream holding companies. This exposure draft includes a proposed disclosure relating to this allocation. Interested parties requested an additional exposure to provide additional time to review.
2019-20	SSAP No. 2R SSAP No. 103R	Rolling Short-Term Investments	Exposed revisions incorporate additional principle concepts in classifying investments as cash equivalents or short-term investments to prevent the "rolling" of certain investments. Revisions from the prior exposure exclude qualifying cash pools from the short-term rolling restrictions provisions. Comments are requested on specific items detailed in the agenda item.	At the December 7, 2019, NAIC Summer Meeting, the SAPWG added guidance to the exposure draft relating to cash pools and how those types of holdings should be treated. No other significant changes were made to the previously exposed guidance.
2019-24	SSAP No. 71	Commission	Exposed revisions include additional NAIC staff modifications regarding persistency commission and levelized commission arrangements to address certain comments received.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-25	SSAP No. 105	Working Capital Finance Investments (WCFI)	Exposed a substantively-revised draft SSAP to incorporate industry proposed revisions to WCFI program requirements.	The revisions to SSAP No. 105 in this exposure draft fall into four categories: 1. Changes to program and or obligor credit quality requirements 2. Changes to program administration and/or documentation 3. Changes to regulatory compliance requirements 4. Changes to statutory reporting requirements As this draft contains substantive changes, we recommend reading the full exposure draft if this impacts your entity.
2019-32	SSAP No. 97	Look-Through with Multiple Holding Companies	Exposed revisions clarify that a more-than-one holding company structure is permitted as a look-through if each of the holding companies within the structure complies with the requirements in SSAP No. 97.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-33	SSAP No. 25	SSAP No. 25 - Disclosures	Exposed revisions data-capture existing disclosures currently completed in a narrative format.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.

2019-34	SSAP No. 25	Related Parties, Disclaimer of Affiliation and Variable Interest Entities	Exposed revisions clarify the types of entities that are included as related parties, that a non-controlling ownership interest greater than 10% is a related party and subject to the related party disclosures, the guidance for disclaimers of affiliation, and control for statutory accounting. The revisions also reject seven ASUs for statutory accounting. The exposure includes an intent to dispose agenda item 2011-16, which is a historical item drafted to consider the SSAP No. 25 definition.	At the December 7, 2019, NAIC Fall Meeting, the SAPWG exposed guidance to clarify entities that are considered related parties. The intent is to better align the SSAP with what is considered a related party for US GAAP purposes. One of the key updates clarifies that even if an entity disclaims control over a related party, it is still considered a related party.
2019-35	SSAP No. 51R SSAP No. 52 SSAP No. 61R	Update Withdrawal Disclosures	Exposed revisions propose minor edits to the liquidity disclosures regarding withdrawal characteristics for life and deposit-type contracts to match noted reporting clarifications.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-36	SSAP No. 51R SSAP No. 53 SSAP No. 54R SSAP No. 59	Expanded MGA and TPA Disclosures	Exposed revisions expand managing general agent and third-party administrator disclosures	The expanded disclosures are intended to help users of the filings better understand what core services a managing general agent and third party administrator are providing as well as what binding authority these entities have.
2019-37	SSAP No. 41R	Surplus Notes – Enhanced Disclosures	Exposed revisions provide enhanced disclosures to identify when an issued surplus note's anticipated or typical cash flows have been partially or fully offset by a held asset.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-38	SSAP No. 86	Financing Derivatives	Exposed revisions clarify the reporting of derivatives with financing premiums. The reporting revisions propose to allow the present value of the derivative premium receivable (and payable) for financed derivatives to be factored into the counterparty risk assessment for life RBC. Comments are also requested on topics detailed in the agenda item.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft. Please see the detailed exposure draft for the specific areas where the SAPWG is seeking comments.
2019-39	SSAP No. 86	Acceptable Collateral for Derivatives	Exposed revisions clarify that the fair value of collateral received or held, for derivative disclosure purposes, shall be reported net of collateral paid/pledged, in the event a counterparty has the legal right to offset against.	At the December 7, 2019, NAIC Fall Meeting, the SAPWG discussed that the current guidance only addresses one type of collateral to report. This exposure draft expands the guidance for what types of collateral are allowable and need to be reported.
2019-40	SSAP No. 53	Reporting of Installment Fees and Expenses	Exposed revisions clarify that the installment fee guidance should be narrowly applied. Comments are requested on how related installment fee expenses as detailed in the agenda item.	At the December 7, 2019, NAIC Fall Meeting, the SAPWG discussed that the current guidance on installment fees is being too broadly applied to exclude other fees. This exposure reinforces the current treatment as well as seeks comment on other fees.
2019-41	SSAP No. 43R	SSAP No. 43R – Financial Modeling	Exposed revisions eliminate the multi-step financial modeling designation guidance in determining final NAIC designations for residential mortgage-backed securities (RMBS)/commercial mortgage-backed securities (CMBS) securities.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft. This exposure is to help stay on the same timeline as the Valuation of Securities Taskforce in relation to these exposures.
2019-42	SSAP No. 2R	Cash Equivalent – Cash & Liquidity Pools	Exposed revisions specify that cash pooling structures that meet specified criteria qualify as cash equivalents.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-43	SSAP No. 5R SSAP No. 72	ASU 2017-11, Earning Per Share, Distinguishing Liabilities from Equity, Derivatives & Hedging	Exposed revisions reject ASU 2017-11 and incorporate guidance for when certain freestanding instruments shall be recognized as liabilities and not equity.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-45	SSAP No. 101	ASU 2013-11, Income Taxes – Presentation of Unrecognized Tax Benefits	Exposed revisions reject ASU 2013-11 for statutory accounting.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-46	Appendix D	ASU 2016-14, Presentation of Financial Statements for Not-for-Profit Entities	Exposed revisions reject ASU 2016-14 as not applicable to statutory accounting.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.
2019-47	SSAP No. 3 SSAP No. 51R	VM21 Grading	Exposed revisions add reference, disclosures and accounting for Section 21 of VM-21. Requirements for Principle-Based Reserves for Variable Annuities, grade-in requirements for reporting changes in the valuation basis for years beginning Jan. 1, 2020.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft. Note that when this change is made it will have a multi-year retroactive impact and will need to be disclosed as a change in accounting principle.
2019-48	SSAP No. 62R	Disclosure Update for Reciprocal Jurisdiction Reinsurers	Exposed revisions incorporate disclosure updates for reinsurers from reciprocal jurisdictions.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft. Note that this will allow for reporting to be updated immediately once the Blanks Working Group adopts their exposure draft.
2019-49	SSAP No. 62R	Retroactive Reinsurance Exception	Exposed agenda item with a request for comments on the preferred approaches for reporting retroactive contracts that meet the exception for prospective accounting and the disadvantages to approaches being used. Industry and state insurance regulator volunteers are requested to assist with developing guidance to clarify both the accounting and reporting for retroactive contracts which are accounted for prospectively.	The "Description", to the left, provides the most up to date information from the December 7, 2019, NAIC Fall Meeting for this exposure draft.