

**Emerging Accounting Issues Working Group
Summary of Outstanding Issues
November 8, 2011**

Attachment A

Title	Description	SSAP	Raised by	Form B Date	Status	Discussion Planned
Line of Credit Issued to Parent Entity; Guaranteed by Reporting Entity	Reporting Entity Guarantees LOC of SCA	5	Industry Question	8/22/02	Issue deferred pending SAPWG assessment of FIN 45.	Not scheduled
EITF 06-2	Accounting for Sabbatical Leave and Other Similar Benefits Pursuant to FASB Statement No. 43	11	GAAP Level C	5/2007	June 2007 - Action on this item was deferred, pending conclusion by the SAPWG on issue 2006-30 regarding FAS 158, pensions, and nonvested employee benefits.	Not scheduled
Clarification of SSAP No. 85	Requests interpretation indicating that disease and case management services provided by a license clinical professional shall be treated as a medical expense.	85	DMAA: The Care Continuum Alliance	2/4/09	Spring 2009 - Working Group referred this item to the Accident and Health Working Group. On 6/5/09, the DMAA requested that this be deferred as they are rediscussing the matter. The AHWG has postponed discussion until advised by the DMAA.	Not Scheduled
FSP EITF 99-20-1: Amendments to the Impairment Guidance of EITF Issue 99-20	In Spring 2009, the SAPWG requested the EAIWG to consider revising INT 06-07 to include guidance from paragraphs 9 and 10 of FSP EITF 99-20-1	INT 06-07	SAPWG	TBD	Spring 2009 - Referred by SAPWG. EAIWG to discuss during a future meeting	Not Scheduled
Electronic Prescribing Transaction Service Fees	Requests clarification of SSAP No. 55 to clarify that third party e-prescription services "transactions service fees" are accounted for as a hospital/medical claims expense.	55	Millennium Consulting Services, LLC	8/10/2009	Fall 2009 - In response to a request from the sponsor of this Form A, the Working Group deferred discussion on this item. Winter 2009 - Working Group deferred action and referred a broader project on health insurers' expenses to the SAPWG.	Not Scheduled
SSAP No. 43R--Loan-backed and Structured Securities Impairment Guidance	Sponsored by CNA Insurance and recommends revisions to paragraph 5 of INT 06-07. The proposed revisions would indicate that a company's intent and ability to hold or intent not to sell as of the reporting date assertions may change subsequent to the reporting date and prior to the recovery of the cost of the investment if the facts and circumstances used to make that determination have changed.	43R	CNA Insurance	11/16/09	Winter 2009 - Working Group noted that the SAPWG is currently considering a project to establish an Implementation Question and Answer Guide for SSAP No. 43R. As such, this item was deferred until completion of the SSAP No. 43R Implementation Guide	Not Scheduled
Illustration of Intercompany Pooling Arrangements	Sponsored by the CT Dept of Insurance and requests that the Working Group develop an illustration on accounting and reporting of intercompany pooling. As noted in the agenda item, the intent is to provide additional guidance for more consistent reporting of intercompany pooling transactions, allowing greater transparency of affiliated reinsurance amounts within a company's balance sheet, statement of income and Schedules F or S as applicable.	63	CT Dept of Insurance	7/29/10	Summer 2010 - Working Group directed staff to work with Connecticut for an accounting and reporting illustration for intercompany pooling transactions.	Not Scheduled

Italics indicates that item was added since last National Meeting

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INT 99-01	3/8/1999	72	California DOI	Accounting for Tax Benefits of Operating Losses and Tax Credits in Quasi-Reorganizations	Tax benefits are an adjustment to gross paid-in and contributed surplus.
INT 99-02	3/8/1999	18	California DOI	Accounting for Collateral in Excess of Debt Principal	No Consensus reached - Further discussion planned.
INT 99-03	3/8/1999	46	NAIC Staff	Accounting for Investment in Subsidiary, Controlled or Affiliated (SCA) Entities with Subsequent Downstream Investment in an Insurance Company	Definition of an insurance SCA would apply to any entity that included an insurance company within its holding company structure
INT 99-04	3/8/1999	37	NAIC Staff	Recognition of Prepayment Penalties Upon Adoption of Codification	Apply retrospectively
INT 99-05	6/7/1999	22	EITF 97-01	Implementation Issues in Accounting for Lease Transactions, Including Those Involving Special-Purpose Entities	Rejected EITF consensus as not applicable to SAP
INT 99-06	6/7/1999	13	EITF 97-02	Application of FASB Statement No. 94 and APB Opinion No. 16 to Physician Practice Management Entities and Certain Other Entities with Contractual Management Arrangements	Rejected EITF consensus as not applicable to SAP
INT 99-07	6/7/1999	18	EITF 97-03	Accounting for Fees and Costs Associated with Loan Syndications and Loan Participations after the Issuance of FASB Statement No. 125.	Rejected EITF consensus
INT 99-10	6/7/1999	68	EITF 97-08	Accounting for Contingent Consideration Issued in a Purchase Business Combination	Adopted EITF consensus with nonsubstantive modification
INT 99-11	10/4/1999	3	EITF 95-22	Balance Sheet Classification of Borrowings Outstanding under Revolving Credit Agreements That Include both a Subjective Acceleration Clause and a Lock-Box Arrangement	Rejected EITF consensus as not applicable to SAP
INT 99-12	10/4/1999 updated 3/13/2005	3	EITF 96-16	Investor's Accounting for an Investee When the Investor Has a Majority of the Voting Interest but the Minority Shareholder or Shareholders Have Certain Approval or Veto Rights	Rejected EITF consensus. Amendment to reject the update to EITF 96-16 contained in EITF 03-16, which was rejected in INT 99-12.
INT 99-13	10/4/1999	13	EITF 96-18	Accounting for Equity Instruments That Are Issued to Other Than Employees for Acquiring, or in Conjunction with Selling, Goods or Services	Rejected EITF consensus
INT 99-14	10/4/1999	18		Debtor's Accounting for a Modification or Exchange of Debt Instruments	Adopted EITF consensus with nonsubstantive modification
INT 99-15	10/4/1999	22	EITF 97-10	The Effect of Lessee Involvement in Asset Construction	Rejected EITF consensus
INT 99-16	10/4/1999	40	EITF 97-11	Accounting for Internal Costs Relating to Real Estate Property Acquisitions	Adopted EITF consensus with nonsubstantive modification
INT 99-17	10/4/1999	13	EITF 97-12	Accounting for Increased Share Authorizations in an IRS Section 423 Employee Stock Purchase	Adopted EITF consensus with nonsubstantive modification
INT 99-18	10/4/1999	17	EITF 97-13	Accounting for Costs Incurred in Connection with a Consulting Contract or an Internal Project That Combines Business Process Reengineering and Information Technology Transformation	Adopted EITF consensus with nonsubstantive modification
INT 99-19	10/4/1999	68	EITF 97-09	Effect on Pooling-of-Interests Accounting of Certain Contingently Exercisable Options or Other Equity Instruments	Rejected EITF consensus as not applicable to SAP
INT 99-20	10/4/1999	68	EITF 98-01	Valuation of Debt Assumed in a Purchase Business Combination	Rejected EITF consensus as not applicable to SAP
INT 99-21	10/4/1999	28	EITF 98-07	Accounting for Exchanges of Similar Equity Method Investments	Adopted EITF consensus with nonsubstantive modification
INT 99-22	10/4/1999	18/40	EITF 98-08	Accounting for Transfers of Investments That Are in Substance Real Estate	Adopted EITF consensus with nonsubstantive modification
INT 99-23	12/6/1999	53	NAIC Staff	Disclosure of Premium Deficiency Reserves	Disclosure shall included statement of fact
INT 99-24	12/6/1999	24	Pennsylvania DOI	Accounting for Restructuring Charges	Record as expense
INT 99-25	12/6/1999	40	Pennsylvania DOI	Accounting for Capital Improvements	Capitalize and depreciate over remaining extended life
INT 99-26	12/6/1999	8/64	Pennsylvania DOI	Offsetting Pension Assets and Liabilities	Offsetting not allowed
INT 99-27	12/6/1999	6	NAIC Staff	Nonadmitting Installment Receivables	Illustration adopted
INT 99-28	12/6/1999	46/48	Interested Parties	Accounting for SCA Mutual Funds, Broker-Dealers and Similar Entities Under SSAP No. 46	Use GAAP equity method
INT 99-29	12/6/1999	32	D. Barnert	Classification of Step-up Preferred Stock	Follow SVO classifications
INT 00-01	3/13/2000	46	NAIC Staff	Investment in Foreign SCA Entity	Value in accordance with SVO P&P Manual until issue is fully addressed in SSAP No. 46
INT 00-02	3/13/2000	22	Interested Parties	Accounting for Leveraged Leases Involving Commercial Airplanes Under SSAP No. 22-Leases	Assets under consideration deemed to be admitted
INT 00-03	3/13/2000	51/52/56	Separate Accounts Working Group and Interested Parties	Illustration of the Accounting and Reporting of Deposit-Type Contracts in Accordance with SSAPs No. 51, 52 and 56	Illustration adopted
INT 00-04	6/12/2000	60	South Dakota DOI	Student Loan Insurance	Situation deemed to fall under SSAP 60 guidelines
INT 00-05	6/12/2000	3	Pennsylvania DOI	Exemption to Merger Disclosure in SSAP No. 3	Exemption provisions adopted
INT 00-06	9/11/2000	13	EITF 97-14	Accounting for Deferred Compensation Arrangements Where Amounts Earned Are Held in a Rabbi Trust and Invested	Adopted EITF consensus with nonsubstantive modification

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INT 00-07	9/28/2005	68	EITF 97-15	Accounting for Contingency Arrangements Based on Security Prices in a Purchase Business Combination	EITF 97-15: Accounting for Contingency Arrangements Based on Security Prices in a Purchase Business Combination rejected as not applicable to statutory accounting principles.
INT 00-08	9/11/2000	15	EITF 98-05	Accounting for Convertible Securities with Beneficial Conversion Features or Contingently Adjustable Conversion Ratios	Rejected EITF consensus, issue will be addressed by Invested Assets WG
INT 00-10	6/12/2000	15	EITF 98-14	Debtor's Accounting for Changes in Line-of-Credit or Revolving-Debt Arrangements	Rejected EITF consensus
INT 00-11	9/12/2000	43/45	EITF 98-15	Structured Notes Acquired for a Specified Investment Strategy	Rejected EITF consensus
INT 00-12	6/12/2000	21/28	EITF 99-04	Accounting for Stock Received from the Demutualization of a Mutual Insurance Company	Adopted EITF consensus with nonsubstantive modification
INT 00-13	6/12/2000	-	EITF 99-05	Accounting for Pre-Production Costs Related to Long-Term Supply Arrangements	Rejected EITF consensus as not applicable to SAP
INT 00-14	6/12/2000	68	EITF 99-06	Impact of Acceleration Provisions in Grants Made between Initiation and Consummation of a Pooling-of-Interests Business Combination	Rejected EITF consensus as not applicable to SAP
INT 00-15	6/12/2000	68	EITF 99-07	Accounting for an Accelerated Share Repurchase Program	Rejected EITF consensus as not applicable to SAP
INT 00-16	6/12/2000	9	EITF 99-11	Subsequent Events Caused by Year 2000	Rejected EITF consensus as not applicable to SAP
INT 00-17	6/12/2000	-	EITF 99-13	Application of Issue No. 97-10 and FASB Interpretation No. 23 to Entities That Enter into Leases with Governmental Entities	Rejected EITF consensus as not applicable to SAP
INT 00-18	6/12/2000	-	EITF 99-15	Accounting for Decreases in Deferred Tax Asset Valuation Allowances Established in a Purchase Business Combination as a Result of a Change in Tax Regulations	Rejected EITF consensus as not applicable to SAP
INT 00-19	6/12/2000	68	EITF 99-18	Effect on Pooling-of-Interests Accounting on Contracts Indexed to a Company's Own Stock	Rejected EITF consensus as not applicable to SAP
INT 00-20	10/16/2001	Preamble	SEC SAB No. 99	Application of SEC SAB No. 99, Materiality to the Preamble of the AP&P Manual	Adopted certain responses of SAB - Revised INT exposed on 6/11/01
INT 00-21	9/11/2000	10	NAIC Staff	Disclosure Requirement of SSAP No. 10, Paragraphs 17 & 18	Disclosure shall take form of "public enterprise" as outlined in FAS No. 109 paragraph 43
INT 00-22	9/11/2000	10	NAIC Staff	Application of SSAP No. 10 to Admissibility of Deferred Tax Asset	Illustration adopted
INT 00-23	9/11/2000	52 61	Industry Question	Reinsurance of Deposit Type Contracts	Allow reserve deduction
INT 00-24	9/11/2000 9/13/2004	46 48	EITF 98-13 EITF 99-10	Accounting by an Equity Method Investor for Investee Losses When the Investor Has Loans to and Investments in Other Securities of the Investee Percentage Used to Determine the Amount of Equity Method Losses	Adopted EITF consensus with nonsubstantive modification
INT 00-25	9/11/2000	46	EITF 97-4	Deregulation of the Pricing of Electricity	Rejected EITF consensus as not applicable to SAP
INT 00-26	9/11/2000	46	EITF 98-3	Determining Whether a Nonmonetary Transaction Involves Receipt of Productive Assets or of a Business	Adopted EITF consensus with nonsubstantive modification.
INT 00-26	6/11/2006	28, 68	NAIC Staff	The issuance of FAS 153: Exchanges of Nonmonetary Assets, an amendment of APB Opinion No. 29 (FAS 153) amends paragraphs of APB 29 cited in the description of the issue in INT 00-26: EITF 98-3: Determining Whether a Nonmonetary Transaction Involves Receipt of Productive Assets or of a Business (INT 00-26).	The Working Group amended the consensus of INT 00-26 to be consistent with FAS 153.
INT 00-26	3/10/2007	28, 68	NAIC Staff	Amend INT 00-26 to remove reference to SSAP No. 68	March 2007 - The tentative consensus to update INT 00-26 to remove reference to SSAP No. 68 was adopted as final.
INT 00-27	9/11/2000	22	EITF 98-9	Accounting for Contingent Rent	Adopted EITF consensus with nonsubstantive modification
INT 00-28	9/11/2000	68	EITF 99-12	Determination of the Measurement Date for the Market Price of Acquirer Securities Issued in a Purchase Business Combination	Adopted EITF consensus with nonsubstantive modification
INT 00-29	9/11/2000	-	EITF 99-17	Accounting for Advertising Barter Transactions	Adopted EITF consensus with nonsubstantive modification
INT 00-30	9/12/2000	55	NAIC Staff	Application of SSAP No. 51, Paragraph 6 to Waiver of Deduction on Flexible Premium Universal Life Insurance Policies	No requirement to record benefit expense and premium income for waiver of deduction on UL policies
INT 00-31	9/12/2000	51	NAIC Staff	Application of SSAP No. 55, Paragraph 12 to Health Entities	Allow health entities to reduce liability for subrogation and COB.
INT 00-32	9/12/2000	26	EITF 00-8	Accounting by a Grantee for an Equity Instrument to Be Received in Conjunction with Providing Goods or Services	Adopted EITF consensus with nonsubstantive modification
INT 01-01	3/26/2001	6	New York DOI	Application of SSAP No. 6, paragraph 9 a. to De Minimums Receivable Balances of Group Accident and Health Policies	De minimums nonadmitted installment receivables would not require current installments to be nonadmitted
INT 01-03	6/11/2001	4	Pennsylvania DOI	Assets Pledged as Collateral or Restricted for the Benefit of a Related Party	Assets restricted by a related parties are nonadmitted

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INT 01-04	3/26/2001	18/33	Deloitte & Touche	SSAPs No. 18 and 33 and Issues Surrounding Securitizations	Follow criteria outlined in SSAP No. 18
INT 01-05	3/26/2001	7	Industry Question	Classification of Accrued Interest on Policy Loans	Allow reclassification
INT 01-07	3/26/2001	48	EITF 98-2	Accounting by a Subsidiary or Joint Venture for an Investment in the Stock of Its Parent Company or Joint Venture Partner	Rejected EITF consensus
INT 01-08	3/26/2001	-	EITF 99-16	Accounting for Transactions with Elements of Research and Development Arrangements	Rejected EITF consensus as not applicable to SAP
INT 01-09	3/26/2001	-	EITF 99-19	Reporting Revenue Gross as a Principal versus Net as an Agent	Rejected EITF consensus as not applicable to SAP
INT 01-10	3/26/2001	48	EITF 00-01	Investor Balance Sheet and Income Statement Display under the Equity Method for Investments in Certain Partnerships and Other Ventures	Rejected EITF consensus
INT 01-11	3/26/2001	-	EITF 00-10	Accounting for Shipping and Handling Fees and Costs	Adopted EITF consensus with nonsubstantive modifications
INT 01-12	3/26/2001	-	EITF 00-14	Accounting for Certain Sales Incentives	Rejected EITF consensus
INT 01-13	3/26/2001	69	EITF 00-15	Classification in the Statement of Cash Flows of the Income Tax Benefit Received by a Company upon Exercise of a Nonqualified Employee Stock Option	Rejected EITF consensus as not applicable to SAP
INT 01-14	3/26/2001	13	EITF 00-16	Recognition and Measurement of Employer Payroll Taxes on Employee Stock-Based Compensation	Adopted EITF consensus
INT 01-15	3/26/2001	-	EITF 00-17	Measuring the Fair Value of Energy-Related Contracts in Applying Issue No. 98-10	Rejected EITF consensus as not applicable to SAP
INT 01-16	6/11/2001	8/14	Industry Question	Measurement Date for SSAP No. 8 Actuarial Valuations	Date of measurement shall be as of the date of the financial statements or if used consistently from year to year an as of date not more than 3 months prior to that date.
INT 01-17	6/11/2001	8	Industry Question	Accounting for Nonqualified Retirement Plans, Nonvested Ancillary Benefits Within Retirement Plans, and Protected Benefits Such as Early Retirement Subsidies in Retirement Plans	A liability for these types of benefits shall be accrued in accordance with FAS 87.
INT 01-18	6/11/2001	10, 16, 68	NAIC Staff	Consolidated or Legal Entity Level – Limitations on EDP Equipment, Goodwill and Deferred Tax Assets Admissibility	Evaluation of admitted assets shall be conducted on a legal entity basis.
INT 01-19	6/11/2001	10	AICPA Insurance Liaison TF	Measurement of Deferred Tax Assets Associated with Nonadmitted Assets	Calculation of DTA applied to the difference between the statutory balance after nonadmission and the tax basis of asset.
INT 01-20	3/26/2001	10	AICPA Insurance Liaison TF	Utilization of Tax Planning Strategies for the Admissibility of Deferred Tax Assets	Position nullified by issuance of SSAP 10 Q&A
INT 01-21	6/11/2001	16, 19	PWC	SSAP Nos. 16, 19, 68 and 79, Reestablishment of Previously Expensed Software and Furniture, Fixtures and Equipment and Goodwill	Reestablishment of previous expensed assets not required.
INT 01-22	6/11/2001	46	NAIC Staff	Use of Interim Financial Statements in Computing Reporting Entity's Investment in Subsidiary Under the GAAP Equity Method	Interim financial statements do not need 12/31 audit but do need annual audit.
INT 01-23	6/11/2001	53, 54	ARAG	Prepaid Legal Insurance Premium Recognition	Premium shall be recognized in accordance with SSAP No. 54.
INT 01-24	5/3/2001	46/48	AICPA Insurance Liaison TF	Application of SSAP No. 46 and 48 to Certain Noninsurance Subsidiary, Controlled or Affiliated Entities	WG able to reach consensus on 6 of the 8 examples provided
INT 01-25	10/16/2001 amended 12/8/2002	26	Industry Question	Accounting for U.S. Treasury Inflation-Indexed Securities	Adjustments to principal shall be recorded through unrealized.
INT 01-26	10/16/2001	51	NAIC Staff	SSAP No. 51 and Reserve Minimum or Required Amount	Amounts higher and lower than minimum would be disclosed if material
INT 01-27	10/16/2001	3	Deloitte & Touche	Accounting Change Versus Correction of Error	Period of change defined as a calendar year.
INT 01-28	10/16/2001	55	American Academy of Actuaries	Margin for Adverse Deviation in Claim Reserve	Margin for adverse deviation neither prohibited or required.
INT 01-29	12/10/2001	59	Kentucky DOI	SSAP No. 59 and Application to Credit Life	SSAP No. 59 applies to credit life
INT 01-31	10/16/2001 amended 12/5/2004	18 33	AEGON	Assets Pledged as Collateral	Assets pledged as collateral admitted until uncured default occurs. Modification to "Status" section was made during Dec. 2004 to accommodate review of FAS 140 subgroup.
INT 01-32	12/10/2001 amended 6/22/2003, amended 6/2/07	1, 5, 65	EITF 01-10, 2007 amendment recommended by Randy Moreau (Allstate Insurance)	Accounting for the Impact of the Terrorist Attacks of September 11, 2001	Adopted EITF position and later modified language in paragraphs 6a, 6b and 7 (Issue 5). Modified in June 2007 to remove the disclosure requirement for events related to Sept. 11, 2001.

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INT 01-33	12/10/2001	62	Wisconsin DOI	Extension of 9-Month Rule in SSAP No. 62	9 month rule extended to 12/31/01 for those entities directly impacted by the 9/11 events
INT 02-01	3/18/2002	62	AICPA Insurance Liaison TF	Disclosure Requirements Under SSAP for Differences Between A-785 and Individual State Requirements as a Result of September 11th	Disclosure not necessary unless funding deed is violated
INT 02-02	3/18/2002	6	NAIC Staff	SSAP No. 6 and Billing of Premium Before Effective Date	Assets should not be recognized until effective date of contract
INT 02-03	3/18/2002	36	ACLI	Accounting for the Impact of the Terrorist Attacks of September 11 on Commercial Mortgage Loans	No changes are necessary to SSAP 36 as a result of 9/11 events
INT 02-04	3/18/2002	61	NAIC Staff	Recognition of CARVM and CRVM Expense Allowances by the Assuming Reinsurer in a Modified Coinsurance Agreement	The assuming insurer records in Page 3, Line 13A, Transfers to Separate Accounts due or accrued and includes in the caption disclosure "Including \$___, accrued for expense allowances recognized in reserves net of reinsurance". Record period changes in Summary of Operations, Line 24A, "Net transfers to or (from) Separate Accounts."
INT 02-05	3/18/2002 amended 12/8/2002	26	Deloitte & Touche	Accounting for Zero Coupon Convertible Bonds	Premium shall be recorded as amortization at date of purchase
INT 02-06	6/9/2002	62	Securitization WG	Indemnification in Modeled Trigger Transactions	Modeled trigger securitizations where there is a high correlation between the model and actual losses of the company should not be accounted for as reinsurance as they do not meet the indemnification criteria of SSAP No. 62. Position consistent with report received from P/C Reinsurance Study Group.
INT 02-07	6/9/2002 updated 3/13/2005	26, 30, 32, 37, 39, 43, 46, 48, 68	NAIC Staff	Definition of Phrase "Other Than Temporary"	The application of the other than temporary impairment criteria is subjective in nature and management should consider various factors that will vary from case to case. The use of quantitative thresholds as the sole basis of measuring impairment removes the ability of management to apply its judgment, a concept inherent in the statutory accounting impairment model. Expansion of INT 02-7 in March 2005 to add language concerning interest rate risk and its effect on impairments of investments
INT 02-08	6/9/02 amended 12/8/2002	61	ACLI and NAIC Staff	Application of A-791 to YRT Reinsurance of a Block of Business	YRT reinsurance agreements shall be subject to the deferral guidance contained in paragraph 3 of A-791. Application of guidance shall be applied on a prospective basis for all treaties entered into on or after January 1, 2003
INT 02-09	9/12/2004	62	NAIC P/C Study Group	A-785 and Syndicated Letters of Credit	Syndicated letters of credit are consistent with A-785 and insurers may take the credit provided a) all banks listed meet criteria of SVO bank list, b) banks are severally and not joint liable, and c) specific percentages for each bank are listed in the letter of credit. This is consistent with the recommendation received from the P/C Reinsurance Study Group.
INT 02-10	6/9/2002	65	Deloitte & Touche	Statutory Audit Report Notes and the Reporting Requirements Related to Disclosures Containing Multiple Year Information	The notes to the audited financial statements shall include 2 years of data for while the notes to the Annual Statement shall include > 2 years of data if applicable. Additionally, the notes to the audit report shall include all the disclosures required by the SSAPs and therefore will not be identical to the notes to the Annual Statement.
INT 02-11	9/10/2002	53	North Carolina DOI	Recognition of Amounts Related to Earned but Unbilled Premiums	Once an estimate of the premium has been recognized and the entity feels certain as to its collectibility, the requisite liabilities associated with the premium shall also be recorded.
INT 02-13	9/10/2002	IP 99	EITF 00-4	Majority Owner's Accounting for a Transaction in the Shares of a Consolidated Subsidiary and a Derivative Indexed to the Minority Interest in That Subsidiary	Rejected EITF position as not applicable to SAP
INT 02-14	9/10/2002	IP 99	EITF 00-6	Accounting for Freestanding Derivative Financial Instruments Indexed to, and Potentially Settled in, the Stock of a Consolidated Subsidiary	Rejected EITF position as not applicable to SAP
INT 02-15	9/10/2002	22	EITF 00-11	Lessors' Evaluation of Whether Leases of Certain Integral Equipment Meet the Ownership Transfer Requirements of FASB Statement No. 13	EITF position adopted with modification
INT 02-16	9/10/2002	IP 99	EITF 01-9	Accounting for Consideration Given by a Vendor to a Customer (Including a Reseller of the Vendor's Products)	Rejected EITF consensus as not applicable to SAP
INT 02-17	9/10/2002	24	EITF 01-13	Income Statement Display of Business Interruption Insurance Recoveries	EITF position adopted with Codification

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INT 02-18	3/9/2003	8	Chicago Consulting Actuaries LLC	Accounting for the Intangible Asset as Described in SSAP No. 8, Paragraph 9 d.v. and 9 f.	The intangible asset offsetting the minimum pension liability shall be non admitted. Reporting entities are allowed to reduce the minimum pension liability for contributions made after the measurement date and before year end.
INT 02-19	12/8/2002	28	EITF 01-1	Accounting for a Convertible Instrument Granted or Issued to a Nonemployee for Goods or Services or a Combination of Goods or Services and Cash	EITF position adopted with modification
INT 02-20	12/8/2002	6	Industry Question	Due Date for Installment Premium Under an Agency Relationship	The due date for installment premiums due from an agent should be governed by the contractual due date of said premiums from the insured.
INT 02-21	12/8/2002	55	NAIC Staff	Accounting for Prepaid Loss Adjustment Expenses and Claim Adjustment Expenses	Liability should be established irrespective of amounts paid to TPAs and management companies
INT 02-22	3/9/2003	35, 61 and 63	Interested Parties	Accounting for the U.S. Terrorism Risk Insurance Program	Recovery of losses from acts of terrorism shall be recorded as reinsured losses. Surcharges meet the requirements of SSAP No. 35
INT 03-01	6/22/2003 3/5/2006	35	NAMIC	Application of SSAP No. 35 to the Florida Hurricane Catastrophe Fund	Assessments made by the FHCF are presumed to be reasonably estimable through no less than three years in the future. (Nullified 3/06)
INT 03-02	6/22/2003	61, 62, 63	CNA	Modification to an Existing Intercompany Pooling Arrangement	Assets shall be transferred at statutory book value and liabilities at statutory value.
INT 03-03	12/7/2003	46/48	NAIC Staff	Admissibility of Investments Recorded Based on the Audited GAAP Equity of the Investee when a Qualified Opinion is Provided	The reporting entity shall record such investments as admitted assets only if the qualified opinions departure from GAAP is quantifiable and other requirements
INT 03-04	6/22/2003	68	EITF 01-3	Accounting in a Purchase Business Combination for Deferred Revenue of an Acquiree	Rejected the consensus position of EITF 01-3 as not applicable
INT 03-05	6/22/2003	18	EITF 01-07	Creditor's Accounting for Modification or Exchange of Debt Instruments	Adopt the consensus position of EITF 01-7
INT 03-06	6/22/2003	86/22	EITF 01-12	The Impact of the Requirements of FAS 133 on Residual Value Guarantees in Connection with a Lease	Reject the consensus of EITF 01-12 as not applicable
INT 03-07	6/22/2003	86	EITF 00-19	Accounting for Derivative Financial Instruments Indexed to, and Potentially Settled in, a Company's Own Stock	Reject the consensus of EITF 00-19 as not applicable
INT 03-08	6/22/2003	86	EITF 01-6	The Meaning of "Indexed to a Company's Own Stock"	Reject the consensus of EITF 01-6 as not applicable
INT 03-10	12/7/2003	86	EITF 01-14	Income Statement Characterization of Reimbursements Received for "Out-Of-Pocket" Expenses Incurred	Rejected EITF consensus as not applicable to SAP
INT 03-11	12/7/2003	86	EITF 02-3	Issues Involved in Accounting for Derivative Contracts Held for Trading Purposes and Contracts Involved in Energy Trading and Risk Management Activities	Rejected EITF consensus as not consistent with treatment in SSAP No. 86
INT 03-12	12/7/2003	36	EITF 02-4	Determining Whether a Debtor's Modification or Exchange of Debt Instruments is within the Scope of FASB Statement No. 15	Adopted the consensus as an interpretation of SSAP No. 36
INT 03-13	12/7/2003	-	EITF 02-6	Classification in the Statement of Cash Flows of Payments Made to Settle an Asset Retirements Obligation within the Scope of FASB Statement No.143	Rejected EITF consensus as not applicable to SAP
INT 03-14	12/7/2003	68	EITF 02-7	Unit of Accounting for Testing Impairment of Indefinite-Lived Intangible Assets	Rejected EITF consensus
INT 03-15	12/7/2003	-	EITF 02-8	Accounting for Options Granted to Employees in Unrestricted, Publicly Traded Shares of an Unrelated Entity	Rejected EITF consensus as not applicable to SAP
INT 03-16	12/7/2003	68	Industry Question	Contribution of Stock	A capital contribution transaction does not meet the definition of a purchase transaction, therefore, SSAP No. 68 is not applicable to this transaction. No interpretation of SSAP No. 68 is necessary.
INT 03-17	9/13/2004	5, 55	Louisiana DOI	Classification of Liabilities from Extra Contractual Obligation Lawsuits	Unpaid claims, losses and LAE: claims related ECO and bad faith adjustment expenses are 1) included in "Adjusting & Other"; 2) included in losses and disclosed in a note; and 3) guidance applies equally to companies with direct and Reinsurance assumed obligations. NAIC staff directed to update Form A to reflect all lines of business. <i>In March 2007, due to modification of SSAP No. 55 to include disclosures for claims related extra contractual obligations losses and bad faith losses, the Working Group modified INT 03-17 to remove the related disclosure requirement from the Interpretation and adopted the modification as final.</i>

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INT 03-18	9/14/2003	8	Interested Parties	Accounting for a Change in the Additional Minimum Liability in SSAP No. 8 —Pensions.	The additional minimum pension liability amounts previously expensed through income shall not be reversed through income in a subsequent period. Changes in accounting principle are reported as adjustments to unassigned funds (surplus) in accordance with SSAP No. 3—Accounting Changes and Corrections of Errors.
INT 04-01	6/13/2004	Preamble	Blue Cross Blue Shield	Applicability of New GAAP Disclosures Prior to NAIC Consideration	New GAAP disclosures do not become part of NAIC Statutory Accounting Principles until review and adoption by the NAIC.
INT 04-02	6/13/2004	41	Interested Parties	Surplus Notes Issued by Entities Under Regulatory Action	A holder of a surplus note must value the note at zero in any period in which the issuer of the note is under regulatory action. Once the issuer is no longer under regulatory action, the holder values the note according to the guidance in SSAP No. 41, paragraph 10.a or 10.b as appropriate.
INT 04-03	6/13/2004	89	NAIC Staff	Clarification for Calculating the Additional Minimum Pension Liability Under SSAP No. 89—Accounting for Pensions, A Replacement of SSAP No. 8 , paragraph 16f	The calculation of the additional minimum pension liability when an actuarial valuation date prior to the financial statement date is utilized shall not consider subsequent contributions to the plan for purposes of calculating the additional minimum pension liability to be recognized. Amended in Dec. 2004 to be consistent with pension illustrations in Exhibit A of SSAP No. 89.
INT 04-04	6/13/2004	23	EITF 01-5	Application of FASB Statement No. 52 to an Investment Being Evaluated for Impairment That Will Be Disposed Of	Rejected EITF consensus as not applicable to SAP
INT 04-05	9/12/2004	N/A	District of Columbia	Clarification of SSAP No. 5 Guidance on when a Judgment is Deemed Rendered	Rejected EITF consensus as not applicable to SAP
INT 04-06	9/12/2004	5	EITF 02-13	Deferred Income Tax Considerations in Applying the Goodwill Impairment Test in FASB Statement No. 142	When a court enters a verdict, judgment is considered "rendered" despite the existence of outstanding motions.
INT 04-07	9/12/2004	15	EITF 02-15	Determining Whether Certain Conversions of Convertible Debt to Equity Securities Are Within the Scope of FASB Statement No. 84	Adopt EITF 02-15 as an interpretation of SSAP No. 15.
INT 04-08	9/12/2004	N/A	EITF 02-17	Recognition of Customer Relationship Intangible Assets Acquired in a Business Combination	Rejected EITF consensus as not applicable to SAP
INT 04-09	12/5/2004	IP 99	EITF 02-16 & EITF 03-10	Sales Incentives Offered to Resellers of Merchandise by Vendors as Discussed in EITF 02-16 and EITF 03-10	EITF 02-16 and EITF 03-10 are rejected as not applicable to SAP
INT 04-10	12/5/2004	46, 48, 88	EITF 02-18	Accounting for Subsequent Investments in an Investee after Suspension of Equity Method Loss Recognition	Adopted EITF 02-18 with modification as an interpretation of SSAP No. 46, SSAP No. 48 and SSAP No. 88.
INT 04-11	12/5/2004	89	EITF 03-2	Accounting for the Transfer to the Japanese Government of the Substitutional Portion of Employee Pension Fund Liabilities	Rejected EITF 03-2 as it is presumed to be a rare occurrence.
INT 04-12	12/5/2004	89	EITF 03-4	Determining the Classification and Benefit Attribution Method for a "Cash Balance" Pension Plan	Adopted EITF 03-4 as an interpretation of SSAP No. 89.
INT 04-13	12/5/2004	81	EITF 03-5	Applicability of AICPA Statement of Position 97-2 to Non-Software Deliverables in an Arrangement Containing More-Than-Incidental Software	Adopted EITF 03-5 as an interpretation of SSAP No. 81.
INT 04-14	12/5/2004	86	EITF 03-6	Participating Securities and the Two-Class Method under FASB Statement No. 128	Rejected EITF 03-6 as not applicable to SAP
INT 04-15	12/5/2004	15	EITF 03-7	Accounting for the Settlement of the Equity-Settled Portion of a Convertible Debt Instrument That Permits or Requires the Conversion Spread to Be Settled in Stock (Instrument C of Issue No. 90-19)	Adopted EITF 03-7 with modification as an interpretation of SSAP No. 15
INT 04-17	12/5/2004	14	Interested Parties	Impact of Medicare Modernization Act on Postretirement Benefits	Entities are required to consider the impact of the Medicare Modernization Act when calculating postretirement benefit obligations.
INT 04-18	3/13/2005	22, 40, 77, 81	EITF 00-21	INT 04-18: EITF 00-21: Revenue Arrangements with Multiple Deliverables	Provides guidance on how to account for arrangements under which the company will perform multiple revenue-generating activities.
INT 04-19	3/13/2005	IP 99	EITF 00-22	INT 04-19: EITF 00-22: Accounting for "Points" and Certain Other Time-Based or Volume-Based Sales Incentive Offers, and Offers for Free Products or Services to Be Delivered in the Future	Discusses how a vendor accounts for rebates or refunds earned by the customer by performing pre-determined activities.

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INT 04-20	3/13/2005	22, 86	EITF 01-8	INT 04-20: EITF 01-8: Determining Whether an Arrangement Contains a Lease	Provides guidance on how to determine whether an arrangement contains a lease that is within the scope of SSAP No. 22.
INT 04-21	3/13/2005	Various	EITF 02-9	INT 04-21: EITF 02-9: Accounting for Changes That Result in a Transferor Regaining Control of Financial Assets Sold	Discussed how to account for a previously sold or transferred asset as "re-purchased" if the basis for that sale accounting subsequently becomes invalid.
INT 04-22	3/13/2005	Various	EITF 02-14	INT 04-22: EITF 02-14: Whether the Equity Method of Accounting Applies When an Investor Does Not Have an Investment in Voting Stock of an Investee but Exercises Significant Influence through Other Means	Discusses when a reporting entity should utilize the equity method of accounting for investments.
INT 04-23	3/13/2005	Various	EITF 03-11	INT 04-23: EITF 03-11: Reporting Realized Gains and Losses on Derivative Instruments That Are Subject to FASB Statement No. 133 and Not "Held for Trading Purposes" as Defined in Issue No. 02-3	Provides guidance regarding if realized gains and losses should be shown gross or net in the income statement for contracts that are not held for trading purposes.
INT 04-24	3/13/2005	48	EITF 03-16	INT 04-24: EITF 03-16: Accounting for Investments in Limited Liability Companies	Discusses how to account for investments in limited liability corporations.
INT 04-25	3/13/2005	Various	EITF 04-2, 04-3 and 04-4	INT 04-25: EITF Positions Related to Mining Investments and Activities	Provide guidance for mining investments and activities.
INT 05-01	6/12/2005	IP 99	EITF 04-8	INT 05-01: EITF 04-8: The Effect of Contingently Convertible Instruments on Diluted Earnings per Share	EITF 04-8: The Effect of Contingently Convertible Instruments on Diluted Earnings per Share position rejected as not applicable to statutory accounting principles
INT 05-02	6/12/2005	20, 68	EITF 04-1	INT 05-02: EITF 04-1: Accounting for Preexisting Relationships between the Parties to a Business Combination (EITF 04-1)	EITF 04-1 Accounting for Preexisting relationships between the Parties to a Business Combination position rejected as not applicable to statutory accounting principles
INT 05-03	9/28/2005	24, 90	EITF 03-13	EITF 03-13: Applying the Conditions in Paragraph 42 of FASB Statement No. 144 in Determining Whether to Report Discontinued Operations (EITF 03-13)	EITF 03-13: Applying the Conditions in Paragraph 42 of FASB Statement No. 144 in Determining Whether to Report Discontinued Operations rejected as not applicable to statutory accounting principles.
INT 05-04	12/32005	6	NAIC Staff	Should an extension of the 90-day rule for uncollected premiums be granted to insurers for policies affected by the hurricanes?	The Working Group reached a final consensus for a one-time extension of the ninety-day rule for uncollected premium balances, bills receivable for premiums and amounts due from agents and policyholders directly impacted by Hurricane Katrina, Hurricane Rita, and Hurricane Wilma.
INT 05-05	12/3/2005	Various	CATF	Accounting for Revenues Under Medicare Part D Coverage	Final consensus to adopt existing statutory accounting guidance for amounts received or receivable under the MMA.
INT 05-06	12/3/2005	53	LA	Earned but Uncollected Premium	The Working Group reached a final consensus that the reporting entity is required to include premium for extended coverage as part of direct and assumed written premium.
INT 06-03	6/11/2006	n/a	GAAP Level C	EITF 04-06: Accounting for Stripping Costs Incurred during Production in the Mining Industry	The Working Group reached a final consensus to reject this EITF as not applicable to statutory accounting.
INT 06-04	6/11/2006	n/a	GAAP Level C	EITF 04-13: Accounting for Purchases and Sales of Inventory with the Same Counterparty	The Working Group reached a final consensus to reject this EITF as not applicable to statutory accounting.
INT 02-21	9/10/2006	55, 84	Bob Kasinow - NJ	Accounting for Managed Care Loss Adjustment Expense as it relates to INT 02-21.	The Working Group reached a final consensus to amend INT 02-21 to provide guidance for treatment of managed care contracts.
INT 06-02	9/10/2006	Various	Cathy Lockett - TX	How to account for investments in CAPCO entities and any prepaid interest that may be associated with the contract provisions.	The Working Group reached a final consensus to adopt the guidance for investments in CAPCO's.
INT 06-05	9/10/2006	N/A	NAIC Staff	EITF 04-17: Determining Whether an Interest is a Variable Interest in a Potential Variable Interest Entity	The Working Group reached a final consensus to reject this EITF as not applicable to statutory accounting.
INT 06-07	12/10/2006	Various	GAAP FSP 115-1 & FAS 124-1	FSP FAS 115-1 and FAS 124-1: The Meaning of Other-Than-Temporary Impairment and Its Application to Certain Investments (FAS 115-1 and FAS 124-1), EITF 03-01: The Meaning of Other-Than-Temporary Impairment and Its Application to Certain Investments and FSP EITF 03-1-1: Effective Date of Paragraphs 10-20 of EITF Issue No. 03-1	The Working Group adopted portions of the FSP and INT 02-07: Definition of Other Than Temporary.
INT 06-08	12/10/2006	n/a	EITF 04-5	Determining Whether a General Partner, or the General Partners as a Group, Controls a Limited Partnership or Similar Entity When the Limited Partners Have Certain Rights	The Working Group reached a final consensus to reject as not applicable to statutory accounting.
INT 06-09	12/10/2006	n/a	EITF 05-5	Accounting for Early Retirement or Postemployment Programs with Specified Features (Such As Terms Specified in Altersteilzeit Early Retirement Arrangements)	The Working Group reached a consensus to reject as not applicable to statutory accounting.

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INT 06-10	12/10/2006	n/a	EITF 05-6	Determining the Amortization Period for Leasehold Improvements Purchased after Lease Inception or Acquired in a Business Combination	The Working Group reached a consensus to reject as not applicable to statutory accounting.
INT 06-11	12/10/2006	n/a	EITF 05-8	Income Tax Consequences of Issuing Convertible Debt with a Beneficial Conversion Feature	The Working Group reached a consensus to reject as not applicable to statutory accounting.
INT 06-12	12/10/2006	10	Interested Parties	Protective Tax Deposits Submitted in Accordance with Section 6603 of the Internal Revenue Service (IRS) Code provides procedures for taxpayers to make, withdraw, or identify deposits to suspend the running of interest on potential underpayments of tax.	The Working Group reached a consensus to adopt guidance for section 6603 Protective Tax Deposits.
INT 06-13	12/10/2006	68	EITF 01-2	Interpretations of APB Opinion No. 29	The Working Group reached a consensus to adopt guidance relative to the EITF issues with modifications.
INT 06-14	6/2/2007	55	Jim Gorman - CT	Reporting of Litigation Costs Incurred for Lines of Business in which Legal Expenses Are the Only Insured Peril	The Working Group reached a consensus that legal defense costs incurred under the definition of covered damages or losses as the only insured peril would be accounted for as losses, while legal defense costs incurred under a duty to defend would be accounted for as Defense and Cost Containment, or DCC. For policies where legal costs are the only insured peril, the insurer shall record the legal costs that reimburse the policyholder as loss and, to the extent the insurer participated in the defense, record its legal costs as DCC.
INT 07-01	6/2/2007	26,43	Dennis Lebar (SunGard)	Application of the Scientific (constant yield) Method in Situations of Reverse Amortization	The Working Group reached a consensus that (1) amortized value using the constant yield method does represent the discounted cash flows for loan backed or structured securities, (2) securities are allowed to change from a premium to a discount or vice versa resulting from application of the scientific method, and (3) companies are permitted to assume away the day delay as the difference was determined to be immaterial.
INT 07-02	6/2/2007		EITF 06-1 - GAAP Level C	EITF 06-1: Accounting for Consideration Given by a Service Provider to Manufacturers or Resellers of Equipment Necessary for an End-Customer to Receive Service from the Service Provider	The Working Group reached a consensus to reject as not applicable to statutory accounting.
INT 07-03	6/2/2007	35	EITF 06-3 - GAAP Level C	EITF 06-3: How Taxes Collected from Customers and Remitted to Governmental Authorities Should Be Presented in the Income Statement (Gross vs. Net)	The Working Group reached a consensus to adopt EITF 06-3 with modification to apply net or gross reporting according the nature of the charge and recovery.
Amend INT 03-03	12/2/2007	97	SAPWG	Admissibility of Investments Recorded on the Audited GAAP Equity of the Investee when a Qualified Opinion is Provided	Working Group adopted language as modified during the meeting to amend INT 03-3 stating that a departure from GAAP due to a statutory audit need not be quantified for admissibility
INT 07-06	12/2/2007	IP 99	GAAP Level C	FSP EITF 85-24-1: Application of EITF Issue 85-24 When Cash for the Right to Future Distribution Fees for Shares Previously Sold is Received from the Third Parties	The Working Group reached a consensus to reject as not applicable to statutory accounting.
INT 08-01	5/31/2008	SSAP 86, IP 99	GAAP Level C	EITF 06-7: Issuer's Accounting for a Previously Bifurcated Conversion Option in a Convertible Debt Instrument When the Conversion Option No Longer Meets the Bifurcation Criteria in FASB Statement No. 133	The Working Group reached a consensus to reject EITF 06-7 as not applicable to statutory accounting.
INT 08-02	5/31/2008	77	GAAP Level C	EITF 06-8: Applicability of the Assessment of a Buyer's Continuing Investment under FASB Statement No. 66 for Sales of Condominiums	The Working Group reached a consensus to adopt with modification Issue 1 and adopt Issue 2 of EITF 06-8. The Issue 1 modification requires continuing investment payments made in the form of buyer's notes to be supported by letters of credit from institutions that are listed by the SVO as meeting credit standards.

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INT 08-03	5/31/2008	97, 48, 3	GAAP Level C	EITF 06-9: Reporting a Change in (or the elimination of) a Previously Existing Difference between the Fiscal Year-End of a Parent Company and That of a Consolidated Entity or between the Reporting Period of an Investor and That of an Equity Method Investee	The Working Group reached a consensus to adopt the guidance in EITF 06-9 modified to apply only to equity method investments.
INT 08-04	5/31/2008	17,29,76, 87,82	GAAP Level C	EITF 07-3: Accounting for Nonrefundable Advance Payments for Goods or Services Received for Use in Future Research and Development Activities	The Working Group reached a consensus to reject EITF 07-3 and provide that all nonrefundable advance payments for goods or services that will be used or rendered for research and development activities shall be expensed when the advance payment is made.
INT 08-05	5/31/2008	95	GAAP Level C	EITF 02-11: Accounting for Reverse Spinoffs	The Working Group reached a consensus to adopt EITF 02-11 without modification.
INT 08-6	5/31/2008	5	GAAP Level C	FSP EITF 00-19-2: Accounting for Registration Payment Arrangements	Fall 2008 - Working Group issued a consensus to adopt FSP EITF 00-19-2. (Under this consensus, registration payment arrangements would meet the definition of a loss contingency, financial instruments would be accounted for in accordance with SAP for that asset type, registration payment arrangements would be measured separate from the financial instrument, and transition revisions would be accounted for as changes in accounting principles.)
INT 08-7	5/31/2008	77	GAAP Level C	EITF 07-6: Accounting for the Sale of Real Estate Subject to the Requirements of FASB Statement No. 66 When the Agreement Includes a Buy-Sell Clause	Fall 2008 - Working Group issued a consensus to adopt EITF 07-6. (Under this consensus, a buy-sell clause should be evaluated for substance of the options in assessing continuing involvement with property after a sale pursuant to paragraph 4 of SSAP No. 77. As detailed in SSAP No. 77, if continuing involvement exists, profit shall not be recognized by the full accrual method.)
INT 08-08	9/22/2008	52, 15	Interested Parties	Balance Sheet Presentation of Funding Agreements Issued to a Federal Home Loan Bank (FHLB)	Summer 2008 - Working Group directed staff to draft an interpretation for discussion and exposure at the 2008 Fall National Meeting stating that arrangements with an FHLB should be accounted for based on the substance of individual agreements. Staff was also directed to submit a referral to the Statutory Accounting Principles Working Group to consider any additional disclosure requirements that might be necessary regarding participation in the FHLB system and the use of FHLB funds. Fall 2008 - Tentative INT was exposed. Winter 2008 - Action was deferred on this item. Spring 2009 - Working Group issued a consensus indicating that funding agreements issued to an FHLB shall be evaluated on an individual basis, and shall be accounted for according to the substance of the individual agreement.
INT 08-9	12/5/2008	IP 99	GAAP Hierarchy	EITF 04-10: Determining Whether to Aggregate Operating Segments That Do Not Meet the Quantitative Thresholds	Winter 2008 - Issued consensus rejecting EITF 04-10. This issue provides guidance on operating segments and interprets FAS 131, which has previously been rejected for statutory accounting.
INT 08-10	12/5/2008	2	NAIC Staff	Whether investments with terms that change or periodically reset within a 30-day period can be considered cash equivalents.	Winter 2008 - Issued consensus stating that investments in securities with terms that are reset at predefined dates or have other features an investor may believe results in a different term than the related contractual maturity should be accounted for based on the maturity at the date of acquisition except where other specific rules within the statutory accounting framework currently exist.

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INT 09-01	6/13/2009	IP 99	GAAP Level C	EITF 07-4: Application of the Two-Class Method Under FAS 128 to Master Limited Partnerships	Spring 2009 - Tentative INT was exposed proposing rejecting of EITF 07-4 for statutory accounting. Summer 2009 - Tentative consensus was adopted without modification.
INT 09-02	6/13/2009	86	GAAP Level C	EITF 07-5: Determining Whether an Instrument (or Embedded Feature) is Indexed to an Entity's Own Stock	Spring 2009 - Tentative INT was exposed proposing rejection of EITF 07-5. Pursuant to the statutory accounting guidance and definition of a derivative in SSAP No. 86, there is no exclusion similar to FAS 133 in which items that are both indexed to a company's own stock and classified in stockholder's equity would not be considered a derivative. As the statutory accounting guidance has not adopted this definition exclusion, GAAP interpretations related to the application of this exclusion are considered not applicable. Summer 2009 - Tentative consensus was adopted without modification.
INT 09-03	6/13/2009	20	GAAP Level C	EITF 08-7: Accounting for Defensive Intangible Assets	Spring 2009 - Tentative INT was exposed indicating that defensive intangible assets are not considered readily marketable and available to satisfy policyholder obligations. As such, these assets are captured within the SSAP No. 20 definition of intangible assets and are nonadmitted for statutory accounting. Summer 2009 - Tentative consensus was adopted with slight clarification that defensive intangible assets are considered assets, but that they are nonadmitted for statutory accounting.
INT 09-04	6/13/2009	Glossary	NAIC Staff	Application of the Fair Value Definition	April 2009 - Tentative INT was exposed to clarify the application of the current definition of "fair value" within the Glossary to the Statutory Accounting Principles in situations when the volume and level or activity for the asset or liability have significantly decreased and transactions which are forced or liquidation sales. Summer 2009 - Tentative consensus was adopted, with minor modifications from comments received.
INT 09-5	6/13/2009	22	GAAP Level C	EITF 08-3: Accounting by Lessees for Maintenance Deposits	Summer 2009 - Issued tentative consensus adopting, with modification, EITF 08-3. Tentative consensus clarifies that refundable maintenance deposits shall be accounted for as a nonadmitted asset. Costs that do not increase the value or usefulness of the asset shall be expensed when incurred under SSAP No. 19. Fall 2009 - Tentative consensus adopted as final.
INT 09-06	6/13/2009	86	GAAP Level C	EITF 08-8: Accounting for an Instrument (or an embedded feature) with a Settlement Amount That is Based on the Stock of an Entity's Consolidated Subsidiary	Summer 2009 - Issued tentative consensus rejecting EITF 08-8 as not applicable to statutory accounting. (Item is not considered applicable as SSAP No. 86 did not adopt the FAS 133 exceptions for the definition of a derivative.) Fall 2009 - Tentative consensus adopted as final.

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INT 09-08	9/21/2009	64 & 91R	NAIC Staff	Statutory Accounting for Loans Received Under the Federal TALF Program	Fall 2009 - Working Group issued a tentative consensus indicating that loans received, and collateral provided, under the TALF program do not meet the SSAP No. 64 criteria for offset. Furthermore, recommends that no specific provisions be established within statutory accounting principles that permit a net reporting presentation for transactions under the TALF program. Winter 2009 - Tentative consensus adopted as final.
INT 99-00	9/21/2009	Various	NAIC Staff	Compilation of Rejected GAAP	Fall 2009 - Working Group issued a tentative consensus to incorporate "rejected" and "non-applicable" FASB EITFs that do not provide additional statutory accounting guidance in a listing within a designated interpretation. Winter 2009 - Tentative consensus adopted as final.
ASU 2009-13	8/14/2010	INT 04-18	GAAP ASU	ASU 2009-13, Revenue Recognition: Multiple-Deliverable Revenue Arrangements	Summer 2010 - Working Group rejected ASU 2009-13 within INT 99-00 as not applicable to statutory accounting and nullified INT 04-18.
ASU 2009-15	12/5/2009	NA	GAAP ASU	ASU 2009-15: Accounting for Own-Share Lending Arrangements in Contemplation of Convertible Debt Issuance or Other Financing	Spring 2010 - Working Group rejected ASU 2009-15 as not applicable to statutory accounting and included reference within INT 99-00.
ASU 2010-01	8/14/2010	72	GAAP ASU	ASU 2010-01, Equity (Topic 505): Accounting for Distributions to Shareholders with Components of Stock and Cash	Summer 2010 - Working Group rejected ASU 2010-01 within INT 99-00 as not applicable to statutory accounting.
INT References to SSAPs	3/26/2010	Various	NAIC Staff	INT References to SSAPs. Impacted interpretations include: INT 00-02, INT 00-03, INT 00-23, INT 01-28, INT 01-29, INT 03-02, INT 04-01, INT 04-02, INT 06-02, and INT 07-01.	Summer 2010 - Working Group agreed to revise several interpretations to ensure the quoted SSAP guidance within the interpretations reflect the SSAP guidance provided in the As of March 2010 AP&P Manual. In addition to the SSAP quotes, the adopted revisions include a notation within INT 00-03 that the included financial statements will not be updated as well as the nullification of INT 00-23 as related guidance was previously included in SSAP No. 61.
EITF 03-12	8/31/2011	5	GAAP Level C	EITF 03-12: The Impact of FASB Interpretation No. 45 on Issue No. 95-1	Spring 2011 - Working Group rejected EITF 03-12 as not applicable to statutory accounting. Reference of this rejection was included in INT 99-00.
EITF 06-10	10/19/2010	INT 99-00	NAIC Staff	EITF 06-10: Accounting for Deferred Compensation and Postretirement Benefit Aspects of Collateral Assignment Split-Dollar Life Insurance Arrangements	Fall 2010 - EITF 06-10 was rejected for statutory accounting as guidance is already included in the SSAPs. (See also INT 07-05T in the Other Listing.)
FASB ASUs	8/31/2011	Policy	NAIC Staff	Consideration of FASB Accounting Standards Updates - This agenda item is to clarify the role of the Emerging Accounting Issues Working Group (EAIWG) as a result of the FASB Codification process.	Summer 2011 - Working Group adopted as final the intent to continue with their existing focus and restrictions without revisions to the statutory accounting policy statements. With this conclusion, the SAPWG will review all FASB ASU's, including those projects that are consensus opinions of the FASB EITF. The EAIWG projects will likely focus on addressing specific questions on NAIC SAP.

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Incorporate Interpretation Guidance into SSAPs	11/3/2011	Various	NAIC Staff	This item proposes a project to consider incorporating guidance from existing statutory accounting interpretations into SSAPs. This proposal is drafted in order to consolidate guidance for particular issues within a single SSAP as well as to present statutory guidance in a manner that is more consistent with GAAP.	Fall 2011 - Working Group adopted a project to consider moving guidance currently included within statutory accounting interpretations into SSAPs, with the interpretations being nullified and included in Appendix H (Nullified Interpretations) of the AP&P Manual. Working Group also adopted revisions to SSAPs from review of initial interpretations (1999 series) to move guidance from the INTs into SSAPs. These recommended revisions to SSAPs were forwarded to the Statutory Accounting Principles Working Group for ratification. (The SAPWG adopted these revisions on 11/3/11 without further exposure.)

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INT	Date of Tentative	SSAP	Raised by	Description	Status	Discussion Planned
INT 00-09T	3/13/2000	10	EITF 98-11	Accounting for Acquired Temporary Differences in Certain Purchase Transactions That Are Not Accounted for as Business Combinations	Rejected EITF consensus - Form B being redrafted to include certain provisions of EITF consensus	Deferred pending staff revision of Form B
INT 01-30T	10/16/2001	61/62	NAIC Staff	SSAP No. 61/62 Nonadmission and the Ninety Day Rule	Tentative - 90 day nonadmission criteria applies to all reinsurance balances	Issue referred to SAPWG for study of consistency among P/C, life and health insurers.
INT 02-12T	6/9/2002	61	NAIC Staff	Determining Policies to be Included in the Existing Block of Business for Purposes of Applying the Accounting Specified in Appendix A-791	Tentative – Policies issued prior to the beginning of the quarter in which the binding letter of intent or reinsurance agreement is executed shall be considered to be part of the existing block of business for purposes of applying the accounting guidance in A-791, paragraph 3.	Deferred pending revision clarification of tentative position by NAIC staff
INT 06-06T	6/11/2006	Various	NAIC Staff	EITF 00-12: Accounting by an Investor for Stock-Based Compensation Granted to Employees of an Equity Method Investee	June 2006 Exposed a tentative consensus to adopt EITF 00-12 with modification. In September 2006, this issue was deferred pending development of guidance on FAS 123 (R).	Deferred
INT 07-04T	9/29/2007	14	GAAP Level C	EITF 06-4: Accounting for Deferred Compensation and Postretirement Benefit Aspects of Endorsement Split-Dollar Life Insurance Arrangements	Fall 2007 - Issued tentative consensus to adopt EITF 06-04 with modifications to the transition guidance to reference appropriate statutory accounting for a change in accounting principle. Winter 2007 - Issue was deferred pending the SAPWG review of FAS 158.	Deferred
Consider "2000" INTs For Inclusion Into SSAPs	11/3/11	Various	NAIC Staff	Item proposes to move guidance from the "2000" series of INTs into SSAPs.	Fall 2011 - Working Group exposed this item. Appendix A of the agenda item details the INTs proposed to be nullified, with guidance included in a SSAP, and the interpretations proposed to be retained within Appendix B of the NAIC Accounting Practices and Procedures Manual. Discussion expected Spring 2012.	Spring 2012

Emerging Accounting Issues Working Group
Summary of Other Issues
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Attachment A

Description	Title	Status
Best Estimate	Definition of best estimate	Issue was referred to SAPWG for inclusion into the SSAP Glossary (Ref #2004-19)
Catastrophe Bonds	Accounting for indemnity-linked cat bonds	Issue was granted "NAIC preferred accounting treatment" and has been incorporated into SSAP No. 74
Catastrophe Options	Accounting for options embedded in an insurance bond	Issue was tabled as topic now being addressed by the Insurance Securitization WG
Disclosure of Fair Value on Schedule A and Its Impact on SSAP 40 Impairment	<i>Reporting impacting impairment question</i>	<i>Removed from agenda. Issue will be presented as a Form A to the SAPWG. In 2004, this issue, IP No. 102, was withdrawn by the sponsor.</i>
EITF 00-02	Accounting for Web Site Development Costs	Included in Issue Paper 112 due to fact that SOP 98-1 was addressed in its entirety
EITF 00-03	Application of AICPA Statement of Position 97-2 to Arrangements That Include the Right to Use Software Stored on Another Entity's Hardware	Included in Issue Paper 111 due to fact that SOP 97-2 was addressed in its entirety
EITF 00-07	Application of Issue No. 96-13 to Equity Derivative Instruments That Contain Certain Provisions That Require Net Cash Settlement If Certain Events outside the Control of the Issuer Occur	Referred to FAS No. 133 Subgroup for consideration in IP. Adopted w/ modification in SSAP No. 86.
EITF 08-3	<i>Accounting by Lessors for Maintenance Deposits</i>	<i>1/22/1900</i>
EITF 08-8	<i>Accounting for an Instrument (or an embedded feature) with a Settlement Amount That is Based on the Stock of an Entity's Consolidated Subsidiary</i>	86
EITF 00-13	Determining Whether Equipment Is "Integral Equipment" Subject to FASB Statements No. 66	Referred to SAPWG for incorporation into SSAP No. 77. Adopted in SSAP No. 77.
EITF 98-10	Accounting for Contracts Involved in Energy Trading and Risk Management Activities	Included in Issue Paper 114
EITF 98-12	Application of Issue No. 96-13 to Forward Equity Sales Transactions	Included in Issue Paper 114
EITF 99-01	Accounting for Debt Convertible into the Stock of a Consolidated Sub	Included in Issue Paper 114
EITF 99-02	Accounting for Weather Derivatives	Included in Issue Paper 114
EITF 99-03	Application of Issue No. 96-13 to Derivative Instruments with Multiple Settlement Alternatives	Included in Issue Paper 114
EITF 99-08	Accounting for Transfers of Assets That Are Derivative Instruments but That Are Not Financial Assets	Included in Issue Paper 114
EITF 99-09	Effect of Derivative Gains and Losses on the Capitalization of Interest	Included in Issue Paper 114
EITF 99-20	Recognition of Interest Income and Impairment on Purchased and Retained Beneficial Interests in Securitized Financial Assets	On May 31, 2008, the SAPWG rejected EITF 99-20 directly in SSAP No. 43 as part of their consideration of SAPWG agenda item #2002-20.
Goodwill Limitation Associated with Downstream Holding Companies	Question as to whether goodwill limits should be calculated when applying equity method to Holding Comp.	Issue was referred to SAPWG for inclusion into IP No. 118, which was finalized in Dec. 2002
Reconsideration of Position Reached in INT 01-26; SSAP No. 51 and Reserve Minimum or Required Amount	Request to modify INT 01-26	Issue rejected by EAIWG and therefore position reached in INT 01-26 is reaffirmed.
Replication Transactions Reporting for Money Market Mutual Funds	Accounting for replication transactions Question as to A/S Classification	Included in Issue Paper 114 Removed from agenda per recommendation from the Invested Asset WG. Issue will be presented as a Form A to the SAPWG
SSAP No. 10 Paragraph 10a. Recoverable from Affiliate Limitations	Question as to treatment of "taxes paid in prior years" when tax allocation agreement is in place.	Nullified by SSAP 10 Q&A
SSAP No. 10 Paragraph 10b.i and Meaning of "Expected to be Realized"	Question as to application of paragraph 10b.i	Nullified by SSAP 10 Q&A
Investments in Guaranteed Investment Contracts	Characteristics of GIC and Annual Statement Reporting	EAIWG determined that the guidance on this issue is clear and there was no need for an interpretation.
Due Date for Installment Premiums under an Agency Relationship	Due date for installment premium balances due from an agent is governed by the contractual due date of said premiums from the insured	As the nonsubstantive changes to SSAP No. 6 adopted by the SAPWG resolve this issue, the Interpretation 02-20 was rescinded by the AP&P task force.
Issues Related to the Accounting for Stock Compensation under APB Opinion No. 25 and FIN 44	EITF 00-23	Referred to SAPWG for inclusion in Issue Paper and SSAP addressing FIN 44. (Ref #2000-17)
Questions as to the establishment of liability and admitted asset for FL Hurricane Fund	INT 01-02	Withdrawn
Funding Arrangements	Classification of Funding Arrangements as Life Contracts	Withdrawn, Virginia expressed their intent to resubmit the issue to the SAPWG.
Accounting for Transferable State Tax Credits	Accounting for Transferable State Tax Credits	Rejected INT 03-09, industry noted that the issue will be resubmitted as a Form A.
AVR/IMR treatment for impairments of asset backed securities in accordance with SSAP No. 43	AVR/IMR treatment for impairments of asset backed securities in accordance with SSAP No. 43	Rejected and referred to SAPWG as a Form A. Finalized nonsubstantive changes in Ref #2001-20.
Question as to admissible audit guidelines for a holding company	INT 01-06: Valuation of a Holding Company	3/14/04 Rejected the tentative as an interpretation of SSAP No. 46. Relevant guidance has been included in SSAP No. 88.
Uncollectible Premiums due to Extended Coverage	Requests clarification regarding if a Company is prohibited from netting of uncollected premiums from direct written premiums as reported on Schedule T if they extend the coverage on non-payment of premiums.	6/13/04 - Withdrawn by sponsor
Accounting for Reinsurance Credits	Requests clarification on what types of reinsurance contracts are eligible for reinsurance reserve credit under SSAP No. 61	Issue referred to SAPWG on 6/13/04 for review as a Form A. (Ref #2004-13)
EITF 03-3	EITF 03-3: Applicability of Topic No. D-79 to Claims-Made Insurance Policies	Issue was superseded by EITF 03-8
INT 04-16	Actuarial Guideline XXXVIII: The Application of the Valuation of Life Insurance Policies Model Regulation	Rejected proposed clarification of guidance to be consistent with the intent and objectives of AG 38 for shadow account policies.
Accounting for Claims-Made Insurance and Retroactive Insurance Contracts by the Insured Entity	EITF 03-8	Issue superseded EITF 03-3. Referred to SAPWG in Dec. 2004. (Ref #2004-33)
SSAP No. 88 change on valuation of foreign sub.	Determining the Statutory Equity of a Foreign Insurance SCA	In March 2005 this issue was removed from the EAIWG agenda and forwarded to the SAPWG as the issue would involve a substantive change to SSAP No. 88. (SAPWG ref # 2005-06)
Recommendations rejecting all new GAAP guidance as issued until considered by the NAIC	Applicability of New GAAP Disclosures Prior to NAIC Consideration	Sponsor has requested to withdraw this issue. EAIWG moved this item to the other category 9/25/2005

**Emerging Accounting Issues Working Group
Summary of Other Issues
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Attachment A

Description	Title	Status
Recommendations modifying INT 03-17: Classification of Liabilities from Extra Contractual Obligations	INT 03-17: Classification of Liabilities from Extra Contractual Obligations	The Working Group rejected the issue.12/4/2005
17: Classification of Liabilities from Extra Contractual Obligations		
Recommendations modifying INT 03-17: Classification of Liabilities from Extra Contractual Obligations	Reinsurance of Separable Benefits	Issue was withdrawn at the request of the sponsor.
791 and actuarial guidelines		
Recommendations on update to the consensus of INT 03-01 to be consistent with Florida law.	Update the INT 03-01: Application of SSAP No. 35 to the Florida Hurricane Catastrophe Fund	Tentative consensus position to modify INT 03-01, exposed during 2005 Winter National Meeting was rejected, as Florida Law is now consistent with SSAP No. 35- <i>Guaranty Fund and Other Assessments</i> ; the existing INT was nullified.
INT 06-01	Accounting for Revenue as a Result of the Sale of Claims Data	The tentative consensus position to treat as other income was withdrawn at the request of the sponsor.
Reporting of premium receivables with credit balances	There may be a credit balance in the premium receivable account for group amounts paid in excess of what was owed to the insurance company.	NALC staff directed to submit the issue to the SAPWG for review.
EITF 05-7	Accounting for Modifications to Conversion Options Embedded in Debt Instruments and Related Issues	Fall 2008 - Removed from the Status of Issues as it has been superseded with the release of EITF 06-6-Debtor's Accounting for a Modification (or Exchange) of Convertible Debt Instruments (EITF 06-6)
Goodwill of a Merged Subsidiary	Asks three questions related to goodwill of a purchased sub that is subsequently merged.	Summer 2009 - Removed from the Status of Issues as the SAPWG adopted related revisions in SSAP No. 68 in 2008 related to the EAIWG referral of this issue.
INT 09-07T - RREMICS	Accounting for Re-Securitized Loans Backed and Structured Securities (e.g., RREMICS)	Disposed by EAIWG - Will be addressed by SAWG - History of Discussion - Summer 2009 - Issued tentative consensus on the basis of existing guidance in SSAP No. 91R and SSAP No. 25. Fall 2009 - The Working Group voted to re-expose a new version of this interpretation submitted by interested parties. Winter 2009 - Working Group rejected the exposed tentative consensus and noted that the issue will be addressed by agenda item 2009-14 on the SAPWG Maintenance Agenda.
Written Premium for Excess of Loss Reinsurance Contracts	Written Premium for Excess of Loss Reinsurance Contracts - This was an agenda submission item submitted by Platinum Underwriters Reinsurance, Inc. The issue identified was that the authoritative literature does not specifically address the appropriate method to record assumed written premium for excess-of-loss (XOL) reinsurance contracts and more specifically, XOL reinsurance contracts that have a minimum guaranteed premium.	During the Spring 2010 meeting, the Working Group conducted discussion on this item and agreed that an interpretation was not necessary as the guidance in SSAP No. 62R would clearly require booking of a premium receivable up-front in the situation described.
INT 10-01T	North Carolina Beach Plan - This agenda item requested guidance for situations in which specific changes are incorporated within pooling agreements.	Spring 2010 - The Working Group exposed a narrow scope interpretation indicating that equity interests that will not be recovered should be written off. In this instance, the recommended category to write-off the equity would be in aggregate write-ins to miscellaneous income. Summer 2010 - The Working Group agreed to the sponsor's (RCI) request to remove this item from the agenda without finalizing the interpretation. The Working Group agreed to make a referral to the Statutory Accounting Principles Working Group on the broader issues related to accounting for state pools and assessments.
INT 07-05T	EITF 06-10: Accounting for Deferred Compensation and Postretirement Benefit Aspects of Collateral Assignment Split-Dollar Life Insurance Arrangements	Fall 2007 - Working Group issued a tentative consensus to adopt EITF 06-10 with modifications to the transition guidance to reference statutory accounting for a change in accounting principle. Winter 2007 - Issue was deferred and interested parties agreed to provide further information. Spring 2008 - Issue was referred to the SAPWG for consideration, recommending that SSAP 21, paragraph 6, be modified to provide additional details on the elements to be considered in determining admissibility of assets related to ownership and control of life insurance arrangements. Summer 2010 - Working Group exposed intent to move INT 07-05T to the other listing within finalizing the interpretation. Guidance related to the issues of control and ownership has already been included within paragraph 6 of SSAP No. 21. Fall 2010 - Working Group agreed to reject EITF 06-10 as guidance has already been included in the SSAPs and move INT 07-05T to the other listing.
EITF 06-5	EITF 06-5: Accounting for the Purchase of Life Insurance - Determining the Amount That Could be Realized in Accordance With FASB Technical Bulletin 85-4	Summer 2011 - Working Group moved EITF 06-5 to the Other Listing as this issue has already been addressed by the Statutory Accounting Principles Working Group. (The SAPWG incorporated revisions to SSAP No. 21 to address the ways in which the contractual terms of life insurance policies owned by reporting entities can affect the amounts realizable under the contracts.) Reference of this is included in INT 99-00.