FINANCIAL CONDITION (E) COMMITTEE

The mission of the Financial Condition (E) Committee is to be the central forum and coordinator of solvency-related considerations of the NAIC relating to accounting practices and procedures; blanks; valuation of securities; the Insurance Regulatory Information System (IRIS); financial analysis and solvency; multi-state examinations and examiner training; and issues concerning insurer insolvencies and insolvency guarantees. In addition, the Committee interacts with the technical task forces.

Ongoing Support of NAIC Programs, Products or Services

1. The Financial Condition (E) Committee will:
   - Coordinate the remaining activities with respect to the Solvency Modernization Initiative (SMI), including implementation, any remaining policy decisions and ongoing discussions with respect to new ideas to improve solvency regulation.—Essential
   - Appoint and oversee the activities of the following: Accounting Practices and Procedures (E) Task Force; Capital Adequacy (E) Task Force; Examination Oversight (E) Task Force; Receivership and Insolvency (E) Task Force; Reinsurance (E) Task Force; Risk Retention Group (E) Task Force; and Valuation of Securities (E) Task Force.—Essential
   - Consider the development of a template/checklist of questions that state insurance departments could use to facilitate the review of an insurer’s risk management program at the time of a policy form filing related to a contingent deferred annuity (CDA) consistent with the recommendations from the Contingent Deferred Annuity (A) Working Group.—Important
   - Review and determine whether revisions to the Synthetic Guaranteed Investment Contracts Model Regulation (#695) are needed to clarify its relationship with contingent deferred annuities (CDAs).—Essential
   - Recommend salary rate adjustments for examiners.—Essential
   - Utilize the Risk-Focused Surveillance (E) Working Group to address specific industry concerns regarding regulatory redundancy, and review any issues industry subsequently escalates to the Committee.—Essential

2. The Emerging Actuarial Issues (E) Working Group will:
   - Work expeditiously to provide timely guidance for companies seeking to comply with the revisions to Actuarial Guideline XXXVIII—The Application of the Valuation of Life Insurance Policies Model Regulation (AG 38).—Essential
   - Consider questions presented by state regulators and companies with respect to requirements under AG 38, and provide timely guidance after an appropriate public process permitting an abbreviated review and comment period. Such guidance will become effective upon its adoption by the Financial Condition (E) Committee.—Essential
FINANCIAL CONDITION (E) COMMITTEE (Continued)

3. The Financial Analysis (E) Working Group will:
   • Analyze nationally significant insurers and groups that exhibit characteristics of trending toward or being financially troubled; determine if appropriate action is being taken.—Essential
   • Interact with domiciliary regulators and lead states to assist and advise as to what might be the most appropriate regulatory strategies, methods and action(s).—Essential
   • Support, encourage, promote and coordinate multi-state efforts in addressing solvency problems, including identifying adverse industry trends, including coordination and consultation with the International Association of Insurance Supervisors (IAIS) Supervisory Forum.—Essential
   • Increase information-sharing and coordination between state regulators and federal authorities, including through representation of state regulators in national bodies with responsibilities for system-wide oversight.—Essential
   • Contribute the perspective and expertise of the Working Group via the chair, or his/her representative, to the development of NAIC regulatory guidance for any security under review by the Invested Assets (E) Working Group of the Valuation of Securities (E) Task Force. (Upon notice that a class of securities has been placed under regulatory review, the chair of Financial Analysis (E) Working Group, or his/her representative, will be deemed a member of the Invested Assets (E) Working Group.)—Essential

4. The Group Solvency Issues (E) Working Group will:
   • Continue to develop potential enhancements to the current regulatory solvency system as it relates to group-solvency-related issues.—Essential
   • Critically review and provide input and drafting to the IAIS Insurance Groups and Cross-Sectoral Issues Subcommittee or on other IAIS papers dealing with group supervision issues.—Essential
   • Assist the International Insurance Relations (G) Committee in developing timely NAIC input into the IAIS Common Framework for the Supervision of Internationally Active Insurance Groups (ComFrame) by providing a forum for technical (non-policy related) issues to be discussed with those states deemed to be most impacted by the project.—Essential
   • Review the Insurance Holding Company System Regulatory Act (#440) and the Insurance Holding Company System Model Regulation (#450) and consider amendments to address issues that have arisen subsequent to the adoption of Model #440 and Model #450 by the NAIC in 2010.—Essential
   • Develop required procedures for state regulators to use when leading and participating in supervisory colleges. Encourage and facilitate communication among regulators participating in diverse supervisory colleges to ensure timely and relevant input toward continuing enhancements of required procedures for holding efficient and effective colleges. As necessary, gather data from states that can assist in answering questions policymakers have regarding U.S. supervisory colleges.—Essential
   • In collaboration with the National Treatment and Coordination (E) Working Group, develop procedures to implement a consolidated public hearing for acquisitions involving multiple jurisdictions under Model #440 and Model #450.—Important
   • Begin to develop an enterprise risk management (ERM) education program for regulators that is designed to maximize the benefit of such training for the ORSA 2015 effective date.—Essential
   • Finalize the ORSA Pilot Project that began in 2014 and complete applicable outputs from the project, including a report to Financial Condition (E) Committee.—Essential
FINANCIAL CONDITION (E) COMMITTEE (Continued)

5. The Health Reform Solvency Impact (E) Subgroup will:
   • Monitor and assess the solvency impacts/concerns for health insurers as a result of the federal Affordable
     Care Act (ACA) and recommend charges for the appropriate Financial Condition (E) Committee groups
     to address these impacts/concerns.—Essential

6. The Health Reform Exam (E) Technical Group of the Health Reform Solvency Impact (E) Subgroup will:
   • Monitor and update the examiners role in reviewing the medical loss ratio reported by insurers to the U.S.
     Department of Health and Human Services (HHS). Also work with HHS to update standard examination
     procedures surrounding the review and reporting of the medical loss ratio.—[Essential]

7. The Mortgage Guaranty Insurance (E) Working Group will:
   • Develop changes to the Mortgage Guaranty Insurers Model Act (#630) and other areas of solvency
     regulation of mortgage guaranty insurers.—Essential

8. The NAIC/AICPA (E) Working Group will:
   • Continually review the Annual Financial Reporting Model Regulation (#205) and its corresponding
     implementation guide; revise as appropriate.—Essential
   • Address financial solvency issues by working with the American Institute of Certified Public Accountants
     (AICPA) and responding to AICPA exposure drafts.—Essential and Ongoing
   • Monitor the federal Sarbanes-Oxley Act, as well as rules and regulations promulgated by the SEC, the
     Public Company Accounting Oversight Board and other financial services regulatory entities.—Essential
     • Review annually the premium threshold amount included in Section 16 of the Annual Financial
       Reporting Model Regulation (#205), with the general intent that those insurers subject to the Section 16
       requirements would capture at least approximately 90% of industry premium and/or in response to any
       future regulatory or market developments.—Ongoing

The following charge is pending adoption by the Financial Condition (E) Committee at Spring National Meeting.

9. The Variable Annuities Issues (E) Working Group will:
   • Oversee the NAIC’s efforts to study and address, as appropriate, regulatory issues resulting in
     variable annuity captive reinsurance transactions.
The National Treatment and Coordination (E) Working Group will:

- Increase utilization and implementation of the *Company Licensing Best Practices Handbook*. Essential
- In collaboration with the Speed to Market (EX) Task Force, encourage synergies between corporate changes/amendments and rate and form filing review and approval to improve efficiency. Important
- Analyze federal law development and the NAIC Solvency Modernization Initiative (SMI) for any needed modifications or revisions to the work of the Working Group. Essential
- Address the future work items identified in the completion of the *Company Licensing Best Practices Handbook* project. Important
- In collaboration with the Corporate Governance (E) Working Group, encourage uniformity of requirements in relation to individuals’ fitness and propriety and the company’s responsibility in notifying state insurance departments of concerns or changes to key individuals. Define “key individuals.” Essential
- In collaboration with the Group Solvency Issues (E) Working Group, develop procedures to implement a consolidated public hearing for acquisitions involving multiple jurisdictions under the *Insurance Holding Company System Regulatory Act* (#440) and update the Form A Database. Essential

The Biographical Third-Party Review (E) Subgroup of the National Treatment and Coordination (E) Working Group will:

- Increase the uniformity of the third-party vendors that prepare background investigative reports to those state insurance departments that require them. Reduce the inefficiency of applications by developing procedures and approval processes. Essential
- Monitor the ongoing adherence of background investigation reports and third-party vendors. Essential
- Encourage uniformity of requirements in relation to individuals' fitness and propriety and the company's responsibility in notifying state insurance departments of concerns or changes to key individuals. Essential

The Company Licensing Transactions (E) Subgroup of the National Treatment and Coordination (E) Working Group will:

- Continue to reduce state-specific requirements, including the need for hardcopies and the forms and supplemental information involved in Uniform Certificate of Authority Application (UCAA), and to streamline the application process. Essential
- Continue to enhance all electronic tools relating to UCAA to increase user-friendliness, accuracy and utility, and to increase its usage by the industry and regulators. Essential

The Private Equity Issues (E) Working Group will:

- Consider development of procedures that regulators can use when considering ways to mitigate or monitor risks associated with private equity/hedge fund ownership or control of insurance company assets, including the development of best practices and consideration of possible changes in NAIC policy positions as deemed appropriate. Essential
13. The **Risk Focused Surveillance (E) Working Group** will:

- Continually review the effectiveness of risk-focused surveillance and develop enhancements to the implementation process as necessary.—**Essential**
- Consider specific regulatory redundancy issues provided by interested parties and provide recommendations to other NAIC committee groups as needed.—**Essential**
- Oversee and monitor the Supervisory Best Practices Program where regulators review and provide feedback on completed risk-focused examinations in a peer-review format.—**Essential**
- Review the financial analysis process and consider the development of enhancements to further incorporate a review of prospective solvency risks.—**Essential**
- Develop more effective means for the financial analysis and examination functions to continually monitor and communicate the results of their review of significant solvency risks facing an insurer.—**Essential**
- Identify and document the regulatory skillsets necessary to effectively monitor the solvency of insurers under an evolving risk-focused surveillance framework.—**Essential**
- Consider recommendations to the Financial Regulation Standards and Accreditation (F) Committee for the purpose of evaluating the suitability of insurance department staffing in relation to the necessary skillsets.—**Essential**
- Develop standardized job descriptions/requirements for common solvency monitoring positions to assist insurance departments in attracting and maintaining suitable staff.—**Essential**

15. The **Risk-Limiting Contracts (E) Working Group** will:

- Develop regulatory guidance on how to evaluate risk transfer as it pertains to reinsurance contracts with risk limiting features and also evaluate how current actuarial/accounting practices used to monitor a company’s financial strength need to be enhanced due to distortions from these contracts.

16. The **Separate Account Risk (E) Working Group** will:

- Study the need to modify existing regulatory guidance related to separate accounts where in recent years various products and contract benefits have increased the risk to the general account. At the conclusion of such study, provide a recommendation to the Financial Condition (E) Committee, including a request for model law development/change if the recommendation is for the NAIC to devote its resources to such an effort.—**Important**

17. The **Surplus Lines Financial Analysis (E) Working Group** will:

- Provide NAIC/International Insurers Department (IID) financial staff guidance and expertise relative to regulatory policy and practices with respect to individual companies and Lloyd’s syndicates that are either listed on or seeking admission to the *Quarterly Listing of Alien Insurers.*—**Essential and Ongoing**
- Refer suggestions to the IID Plan of Operation (C) Review Group regarding the IID Plan of Operation and its requirements relating to standards for inclusion on the *Quarterly Listing of Alien Insurers.* Additionally, refer suggestions for improvements for the IID annual reporting standards and forms. —**Essential**

NAIC Support Staff: Todd Sells
ACCOUNTING PRACTICES AND PROCEDURES (E) TASK FORCE

The mission of the Accounting Practices and Procedures (E) Task Force is to identify, investigate and develop solutions to accounting problems with the ultimate goal of guiding insurers in properly accounting for various aspects of their operations and to modify the Accounting Practices and Procedures Manual to reflect changes necessitated by task force action and to study innovative insurer accounting practices which affect the ability of regulators to determine the true financial condition of insurers.

Ongoing Support of NAIC Programs, Products or Services

1. The Accounting Practices and Procedures (E) Task Force will:
   • Oversee the activities of the Blanks (E) Working Group, the Emerging Accounting Issues (E) Working Group and the Statutory Accounting Principles (E) Working Group.—Essential

2. The Blanks (E) Working Group will:
   • Consider improvements and revisions to the various annual/quarterly statement blanks to: 1) conform these blanks to changes made in other areas of the NAIC to promote uniformity in reporting of financial information by insurers; 2) develop reporting formats for other entities subject to the jurisdiction of state insurance departments; 3) conform the various NAIC blanks and instructions to adopted NAIC policy; and 4) oversee the development of additional reporting formats within the existing annual financial statements as needs are identified.—Essential and Ongoing
   • Continue to monitor state filing checklists to maintain current filing requirements.—Essential and Ongoing
   • Continue to monitor and improve the quality of financial data filed by insurance companies by recommending improved or additional language for the Annual Statement Instructions.—Essential and Ongoing
   • Continue to monitor and review all proposals necessary for the implementation of statutory accounting guidance to ensure proper implementation of any action taken by the Accounting Practices and Procedures (E) Task Force affecting annual financial statements and/or instructions.—Essential and Ongoing
   • Continue to coordinate with other task forces of the NAIC to ensure proper implementation of reporting and instructions changes as proposed by these task forces.—Essential and Ongoing
   • When a class of securities is being reviewed by the Invested Assets (E) Working Group, the chair of Blanks (E) Working Group, or his/her representative, will be deemed a member of the Invested Asset (E) Working Group of the Valuation of Securities (E) Task Force. The chair, or his/her representative, is charged with contributing the applicable perspective and expertise of the regulatory group to the development of NAIC regulatory guidance for the security under review by the Invested Assets (E) Working Group.—Essential and Ongoing
   • Adjust blanks and instructions to develop principle-based reserving (PBR) reporting under the framework developed by the PBR Review (EX) Working Group.—Essential
   • Coordinate with the Life Actuarial (A) Task Force to utilize any special reports developed and avoid duplication of reporting.—Essential

3. The Investment Reporting (E) Subgroup of the Blanks (E) Working Group will:
   • Review requests for investment schedule blanks and instructions changes in connection with the work being performed by the Investment Risk-Based Capital (E) Working Group. The Subgroup will review for technical changes and/or clarifications to the blanks and instructions.—Essential and Ongoing
   • Review changes requested by other NAIC groups, including, but not limited to, the Valuation of Securities (E) Task Force, the Statutory Accounting Principles (E) Working Group and the Invested Asset (E) Working Group as it relates to their work on other invested assets reporting for technical consistency within the investment reporting schedules and instructions. This includes requests by interested parties for reporting instruction clarifications.—Essential and Ongoing
EXAMINATION OVERSIGHT (E) TASK FORCE

The mission of the Examination Oversight (E) Task Force is to monitor all aspects of the financial examination process and to identify, investigate and develop solutions to problems related to financial examinations; to monitor and refine the IRIS ratios and the Financial Analysis Solvency Tools, including Company Profiles, FAST ratio scoring system and the Financial Analysis Handbook; to oversee the Analyst Team Project; to review details of examination surveillance process; to monitor the development of tests for determining when a financial examination of an insurer is necessary; to establish procedures for flow of information between states about troubled companies; to enhance the quality and timeliness of financial examinations and monitor additions to the Financial Condition Examiners Handbook covering this area; and to monitor the examination schedules in various states and assist the states in developing methods to maintain current schedules.

Ongoing Support of NAIC Programs, Products or Services

1. The Examination Oversight (E) Task Force will:
   • Provide input and comments to the International Association of Insurance Supervisors (IAIS) or other related groups on issues regarding international risk-management concepts; coordinate such comments with the International Solvency and Accounting (E) Working Group.—Important
   • Provide ongoing maintenance and enhancements to the Form A Database and monitor its usage.—Important
   • Provide ongoing maintenance and enhancements to the NAIC Lead State Summary Report tool and encourage coordination with solvency matters.—Essential

2. The Analyst Team System Oversight (E) Working Group will:
   • Monitor the work performed by the Analyst Team and the progress of any changes made to the Analyst Team Project.—Essential

3. The Electronic Workpaper (E) Working Group will:
   • Develop a formal recommendation to fulfill the long-term needs of regulators in utilizing electronic workpapers to conduct and document solvency monitoring activities.—Essential

4. The Financial Analysis Handbook (E) Working Group will:
   • Provide ongoing maintenance and enhancements to the Financial Analysis Handbook and related applications for changes to the NAIC annual/quarterly financial statement blanks, as well as coordinate and analyze input received from other state regulators.—Essential
   • Continue to incorporate the assessment of risk and risk management into the financial analysis oversight role and incorporate guidance into the Financial Analysis Handbooks to assist analysts in reviewing Own Risk and Solvency Assessment (ORSA) Summary Reports.—Essential
   • In compliance with the framework developed by the PBR Review (EX) Working Group:
     o Provide advice to regulators, identifying and judging risk, establishing Level 1 and Level 2 procedures, identifying frequency of model reviews, and documenting some best practices. Address all risks, financial and non-financial (e.g., ERM, board, corporate governance and ORSA).—Important
     o Adjust the Financial Analysis Handbook to develop principle-based reserving (PBR) changes.—Important
   • Continue incorporating enhancements that encourage coordination of analysis activities within holding company groups.—Essential
5. The Financial Analysis Research and Development (E) Working Group will:
   • Provide ongoing maintenance and enhancements to the automated financial solvency tools developed to assist in monitoring the financial condition of insurance companies. Prioritize analysis and examination efforts to help ensure that the tools remain reliable and accurate.—Essential
   • Review current financial analysis solvency tools for life insurance companies for consideration of risk with reserve liabilities as affected by principle-based reserving standards; make appropriate enhancements as necessary.—Important

6. The Financial Examiners Coordination (E) Working Group will:
   • Develop enhancements that encourage coordination of examination activities with regard to holding company groups.—Essential
   • Promote coordination by assisting and advising domiciliary regulators and exam coordinating states as to what might be the most appropriate regulatory strategies, methods and actions regarding financial examinations of holding company groups.—Essential
   • Provide ongoing maintenance and enhancements to the Financial Examination Electronic Tracking System (FEETS). The Working Group also will provide reports to the Examination Oversight (E) Task Force regarding usage of ETS, including examination and coordination statistics.—Essential

7. The Financial Examiners Handbook (E) Technical Group will:
   • Continue incorporating the assessment of risk and risk management into the financial solvency oversight role and maintain guidance in the Financial Condition Examiners Handbook to assist examiners in reviewing Own Risk and Solvency Assessment (ORSA) Summary Reports.—Essential
   • Continually review the Financial Condition Examiners Handbook and revise, as appropriate.—Essential
   • Review annually the examination procedures included within the Financial Condition Examiners Handbook for updates in response to revisions to the Accounting Practices and Procedures Manual.—Essential
   • Continually review the Annual Financial Reporting Model Regulation (#205) and its related Implementation Guide and revise the Financial Condition Examiners Handbook, as appropriate.—Essential
   • Coordinate with the Risk-Focused Surveillance (E) Working Group to monitor the implementation of the risk-assessment process by developing additional guidance and exhibits within the Financial Condition Examiners Handbook, including the use of interim examination procedures, development of the branded risk classifications as a communication tool between examiners and analysts, and other guidance as needed to assist examiners in completing financial condition examinations.—Important
   • Coordinate with the Financial Analysis Handbook (E) Working Group to develop and maintain guidance for reviewing ORSA Summary Reports, corporate governance and other projects as necessary in order to provide effective solvency monitoring.—Important
   • In compliance with the framework developed by the PBR Review (EX) Working Group:
     o Provide advice to regulators, identifying and judging risk, building repositories, evaluating controls, determining the extent of data quality testing (by actuaries and examiners), identifying frequency of model reviews, and documenting some best practices. Address all risks, financial and non-financial (e.g., ERM, board, corporate governance and ORSA).—Important
     o Adjust the Financial Condition Examiners Handbook to develop PBR changes.—Important
EXAMINATION OVERSIGHT (E) TASK FORCE (Continued)

- Upon notice that a class of securities has been placed under regulatory review, the chair of the Financial Examiners Handbook (E) Working Group or his/her representative will be deemed a member of the Invested Asset (E) Working Group of the Valuation of Securities (E) Task Force. The chair or his/her representative is charged with contributing the perspective and expertise of the regulatory group to the development of NAIC regulatory guidance for the security under review.—Important

8. The **Financial Examination Report (E) Subgroup** of the Financial Examiners Handbook (E) Technical Group will:
   - Review existing requirements for examination reports and consider revisions to align with examination objectives. The Subgroup will provide its recommendations to the Financial Examiners Handbook (E) Technical Group.—**Essential**

9. The **IT Examination (E) Working Group** will:
   - Monitor state usage of automated examination tools, technology changes and emerging issues in order to re-evaluate examination processes and keep states abreast of the latest tools, techniques and training.—**Essential**
   - Enhance current training opportunities for auditing tools and techniques: Continue offering on-site training programs that are available to the states upon request.—**Essential**
   - Continually review and revise, as needed, the “General Information Technology Review” and “Exhibit C—Evaluation of Controls in Information Systems” sections of the **Financial Condition Examiners Handbook**.—**Essential**
   - Develop and maintain tools that will be part of a more complete information technology (IT) examination process.—**Essential**

NAIC Support Staff: Becky Meyer
REINSURANCE (E) TASK FORCE

The mission of the Reinsurance (E) Task Force is to monitor and coordinate activities and areas of interest, which overlap to some extent the charges of other working groups, specifically the International Insurance Relations (G) Committee.

Ongoing Support of NAIC Programs, Products or Services

1. The **Reinsurance (E) Task Force** will:
   - Provide a forum for the consideration of reinsurance-related issues of public policy.—**Essential**
   - Oversee the activities of the Reinsurance Financial Analysis (E) Working Group.—**Essential**
   - Oversee the activities of the Qualified Jurisdiction (E) Working Group.—**Essential**
   - Monitor the implementation of the revised Credit for Reinsurance Model Law (#785) and the Credit for Reinsurance Model Regulation (#786) by NAIC-member jurisdictions.—**Essential**
   - Communicate and coordinate with the Federal Insurance Office and other federal authorities on matters pertaining to reinsurance.—**Essential**
   - Consider recommendations referred to the Task Force with respect to the Captives and Special Purpose Vehicles (SPV) white paper.—**Essential**
   - Consider the referral from the Valuation of Securities (E) Task Force regarding the planned modification of credit rating standards in the NAIC Bank List and advice about the definition of “qualified U.S. financial institution” and other issues.—**Essential**
   - Consider any other issues related to the revised Model #785 and Model #786.—**Important**
   - Monitor the development of international principles, standards and guidance with respect to reinsurance. This includes, but is not limited to, monitoring the activities of various groups within the International Association of Insurance Supervisors (IAIS), including the Reinsurance and Other Forms of Risk Transfer Subcommittee, Reinsurance Mutual Recognition Subgroup and Reinsurance Transparency Group.—**Important**
   - Consider the impact of reinsurance-related federal legislation, including, but not limited to, the federal Nonadmitted and Reinsurance Reform Act and the Federal Insurance Office Act, and coordinate any appropriate NAIC action.—**Important**
   - Consider referrals with respect to the XXX/AXXX Reinsurance Framework.—**Essential**

2. The **Reinsurance Financial Analysis (E) Working Group** will:
   - Provide advisory support and assistance to states in the review of reinsurance collateral reduction applications. Such a process with respect to the review of applications for reinsurance collateral reduction and qualified jurisdictions should strengthen state regulation and prevent regulatory arbitrage.—**Essential**
   - Provide a forum for discussion among NAIC jurisdictions of reinsurance issues related to specific companies, entities or individuals.—**Essential**
   - Support, encourage, promote and coordinate multi-state efforts in addressing issues related to certified reinsurers, including but not limited to multi-state recognition of certified reinsurers.—**Essential**
   - Provide analytical expertise and support to the states with respect to certified reinsurers and applicants for certification.—**Essential**
   - Interact with domiciliary regulators of ceding insurers and certifying states to assist and advise on the most appropriate regulatory strategies, methods and actions with respect to certified reinsurers.—**Essential**
   - Provide guidance and expertise on regulatory policy and practices with respect to certified reinsurers.—**Essential**
   - Provide advisory support with respect to issues related to the determination of qualified jurisdictions.—**Important**
3. The Qualified Jurisdiction (E) Working Group will:
   • Develop and maintain the NAIC List of Qualified Jurisdictions in accordance with the Process for Developing and Maintaining the NAIC List of Qualified Jurisdictions.—Essential

4. The XXX/AXXX Reinsurance Regulation Drafting (E) Subgroup will:
   • Consider referrals with respect to the XXX/AXXX Reinsurance Framework.—Essential

NAIC Support Staff: Dan Schelp