



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

April 29, 2020
Bulletin Number FS-38

TO: ALL DOMESTIC INSURANCE COMPANIES, DOMESTIC HEALTH CARE CENTERS, AND DOMESTIC FRATERNAL BENEFIT SOCIETIES AUTHORIZED TO DO BUSINESS IN THE STATE OF CONNECTICUT.

SUBJECT: Compliance With Certain Hard Copy Filing Requirements and Certain Holding Company Filings in Light of COVID-19

The coronavirus disease 2019 (COVID-19) outbreak in the United States including Connecticut continues to severely impact businesses, supply chains, workforces and consumers. The COVID-19 has led to disruptions to transportation, limitations on social and business gatherings, imposition of quarantines, self-isolation and social distancing policies by government and businesses such as working remotely and use of virtual-only meetings and teleconferencing in lieu of in-person meetings in order to help slow the spread of the virus and minimize the resulting serious illness or death.

The Connecticut Insurance Department (CID) recognizes that COVID-19 may present challenges to Connecticut licensed insurers and other regulated entities in meeting certain regulatory filing requirements, particularly if, as a result of COVID-19, personnel or other third-party service providers that are necessary to prepare these regulatory submissions (reports/filings, etc.) become unavailable or only available on a limited basis. Connecticut Governor Ned Lamont, in recognition that it may be necessary to extend statutory and regulatory administrative deadlines in order to properly respond to the COVID-19 pandemic, has issued [Executive Order No. 7M](#), dated March 25, 2020, to permit department heads, including the Insurance Commissioner, to extend statutory, regulatory, or other time limitations by up to 90 days.

Therefore, in light of the current COVID-19 situation, the Insurance Commissioner finds that it is in the public interest and consistent with efforts to slow the spread of the virus and minimize serious illness or death for the CID to provide conditional regulatory relief and assistance to Connecticut licensed insurers with respect to certain regulatory filings requirements, as described herein.

This action is in accord with the authority set forth above and pursuant to Conn. Gen. Stat. § 38a-8, which gives the Commissioner "all powers specifically granted, and all further powers that are reasonable and necessary to enable the Commissioner to protect the public interest" in accordance with the duties imposed on the Commissioner by the insurance statutes.

The purpose of this bulletin is for the CID to advise all domestic insurers, domestic health care centers or domestic fraternal benefit societies (collectively “domestic companies”) regarding compliance with regulatory requirements during the COVID-19 public health emergency. This flexibility is being provided in part to recognize that we and other states anticipate using additional targeted information requests to gather more specific information and your prompt attention to those matters is appreciated.

At this time domestic companies are still required to make all required electronic filings with the NAIC (e.g. quarterly financial statements, audited financial statements), or for those that are not filed with the NAIC to submit electronically to cid.financial@ct.gov. However, pursuant to Conn. Gen. Stat. §§ 38a-53(e) and 38a-614(8) the CID is willing to allow insurers an additional 30, 45, 60 or 90 days to complete most of the following **hard copy** filings, but must receive a request for late filing from your domestic company, and reserves the right to reject any such individual domestic company requests based upon the financial condition and unique circumstances of that company deemed applicable to that domestic company. If your domestic company believes that it will not be able to meet any of the following financial filing deadlines required by law or by order, please contact the CID at cid.financial@ct.gov to submit a request for waiver of the filing deadline.

To the extent that this Bulletin grants extensions to deadlines previously extended by Bulletin Number FS-36 issued March 24, 2020, the extensions in this Bulletin shall supersede those previously granted.

Filings with a 30-day Delay

- May 1, 2020 Combined Annual Statement Filing (Property)
- May 1, 2020 Combined Insurance Expense Exhibit (Property)
- June 1, 2020 Corporate Governance annual Disclosure
- June 1, 2020 Form B Registration Statement & Related Form C
- June 1, 2020 Risk Assessment Report (Form F)
- PBR Exemption filing due to state July 1, 2020 and to NAIC August 15, 2020 (Life/Fraternal)

Filings with a 45-day Delay

- May 15, 2020 Quarterly Statement Filing as of March 31, 2020 (Property, Life/Fraternal, Health, Title)
- May 15, 2020 Trusteed Surplus Statement – Quarter Ending March 31, 2020 (Property, Life/Fraternal)
- May 15, 2020 Supplement A to Schedule T (Medical Professional Liability Supplement) – Quarter Ending March 31, 2020 (Property)
- May 15, 2020 Medicare Part D Coverage Supplement – Quarter Ending March 31, 2020 (Property, Life/Fraternal, Health)

- May 15, 2020 Merger/history quarterly form, if applicable (Property, Life/Fraternal, Health, Title) (electronic txt file only)
- May 15, 2020 Reasonableness of Assumptions Certification Required by Actuarial Guideline XXXV – Quarter Ending March 31, 2020 (Life/Fraternal)
- May 15, 2020 Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV – Quarter Ending March 31, 2020 (Life/Fraternal)
- May 15, 2020 Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method Required by Actuarial Guideline XXXVI – Quarter Ending March 31, 2020 (Life/Fraternal)
- May 15, 2020 Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Average Market Value) – Quarter Ending March 31, 2020 (Life/Fraternal)
- May 15, 2020 Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Market Value) – Quarter Ending March 31, 2020 (Life/Fraternal)
- May 15, 2020 Director and Officer Insurance Coverage Supplement – Quarter Ending March 31, 2020 (Property)

Filings with a 60-day Delay

- June 1, 2020 Audited Financial Report (Property, Life/Fraternal, Health, Title)
- June 1, 2020 Communication of Internal Control Related Matters Noted in Audit with no unremediated material weaknesses. (Property, Life/Fraternal, Health, Title)
- August 1, 2020 Communication of Internal Control Related Matters Noted in Audit with unremediated material weaknesses. (Property, Life/Fraternal, Health, Title)
- August 1, 2020 Management’s Report of Internal Control over Financial Reporting (Property, Life/Fraternal, Health, Title)

Insurance Holdings Company Filings with a 90-day Delay

Forms D and D-1- Seal and Department Approvals. Pursuant to Conn. Gen. Stat. Section 38a-136(a) Form D Prior Notice of a Transaction and Form D-1 Prior Notice of Dividends on Common Stock and Other Distributions, are to continue to be filed electronically through CID.FinRegFilings@ct.gov. For the period from and including the date of the Bulletin to June 15, 2020, the seal required on the signature page of each such Form may be omitted from the Form filing. Due to the potential disruption, CID approvals/disapprovals will be extended to a 90-day approval/disapproval time frame.

The CID intends to continue to monitor the current situation and the time period for any or all of the relief may, if necessary, be extended with any additional conditions that are deemed appropriate. The CID may issue other relief as necessary or appropriate as the COVID-19 crisis progresses.

Please contact the CID Financial Regulation Division, cid.financial@ct.gov with any questions about this bulletin.



Andrew N. Mais
Insurance Commissioner