





LOW-INTEREST RATE TASK FORCE

Readiness & Advocacy Subcommittee – Meeting #4

CONFIDENTIALITY

Our clients' industries are extremely competitive, and the maintenance of confidentiality with respect to our clients' plans and data is critical. Oliver Wyman rigorously applies internal confidentiality practices to protect the confidentiality of all client information.

Similarly, our industry is very competitive. We view our approaches and insights as proprietary and therefore look to our clients to protect our interests in our proposals, presentations, methodologies and analytical techniques. Under no circumstances should this material be shared with any third party without the prior written consent of Oliver Wyman.

AGENDA

STATUS UPDATE 5 minutes

REGULATORY PROGRESS UPDATE 15 minutes

READINESS PROGRESS UPDATE 10 minutes

SPRINT UPDATE: COVID-19 MORTALITY 25 minutes

OPEN DISCUSSION AND NEXT STEPS 5 minutes

APPENDIX 1: COVID-19 SURVEY - DETAILED RESULTS

APPENDIX 2: ADVOCACY PRIORITIES

APPENDIX 3: TASK FORCE & SPRINT PARTICIPANTS

STATUS UPDATE: STATUS & REVISED WORKPLAN

- Our accelerated timeline has resulted in progress on several efforts:
 - Launched sprints on high-priority issues and identified initial findings
 - Developing surveys to provide additional context on industry practices
- Several efforts are ongoing:
 - ACLI Technical committee working through language and prepping to launch regulatory priorities
 - Holding sprint follow up meetings over the next two weeks
- Near-term meeting cadence:
 - Weekly Readiness/Regulatory Sub-Committee meetings (Thursdays at 3pm)
 - Bi-weekly Task Force SteerCo meetings (next meeting: 4/24)

REGULATORY: ADVOCACY PRIORITIES

Executive committee call on 3/25 approved near term priorities; detailed status of advocacy priorities in appendix

Near-term priorities (~45 days)

- Address product-specific requirements that are not workable in a very low rate environment
 - 7702 (Federal)
 - Life non-forfeiture (NAIC/State)
 - Annuity non-forfeiture (NAIC/State)
- Flooring reserving rate at zero in the event of negative interest rates (NAIC/State)
- Potential roadblocks to new business in a limited face-to-face environment (e-signature, underwriting, others)
- Changes to RBC factors
 - C-1 (e.g., delinking bond and real estate factors to accelerate real estate timeline)
 - C-2 (e.g., postponing addition of longevity factor until mortality factors are updated, ensuring inclusion of covariance factor)
- Repurposing NAIC's LST away from hypothetical examples and using COVID-19 as the stress
- Getting NAIC guidance on the impact of mortgage forbearance on Statutory Accounting and RBC

Longer-term areas for focus (this year)

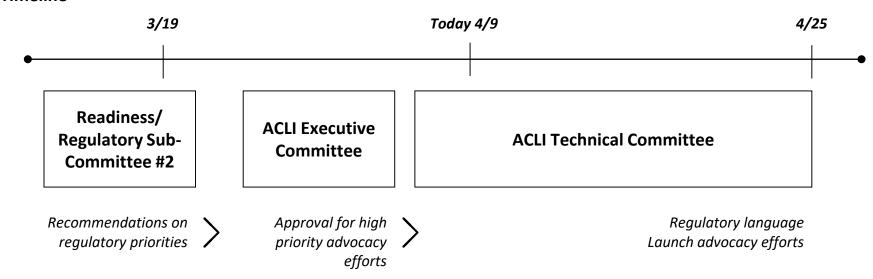
- Delays to new requirements with significant resource demands
 - GAAP LDTI
 - Others?
- Path to ensure regulatory bandwidth does not prevent required updates to product filings
- Additional guidance on AAT/CFT (preference to maintain discretion by appointed actuary)

No action or lower priority

NAIC ESG (viewed as sufficiently long horizon)

REGULATORY: NEXT STEPS & TIMELINE

Timeline



Next steps

• ACLI technical committee to work through regulatory language and launch advocacy efforts

READINESS: LAUNCHED SPRINTS ON HIGH-PRIORITY TOPICS

Process update

- Initial meetings have been held for each sprint, focusing on:
 - Agreeing on key challenges that life insurers are facing in light of current market conditions
 - Identifying emerging best practices in response to these challenges
- We have identified initial views and challenges for each of the sprints
- We are launching surveys for selected sprint topics (e.g., COVID-19 mortality, CFT, New business, ALM)
 - Surveys being developed in partnership with SOA
- We have completed the COVID-19 mortality survey and have initial results for discussion today (see next slides and appendix)
- Sprint follow-up calls to be held over the next two weeks

Sprint topics

- Cash flow testing survey launched
- COVID-19 mortality survey completed
- VA/FIA hedging next sprint meeting 4/9
- New business & products 3/27 kickoff
- ALM survey in progress
- Social distance & distribution next sprint meeting 4/10

OVERVIEW: COVID-19 MORTALITY SURVEY

Survey context

Objectives

- Primary focus is on the potential impacts of COVID-19 mortality on the insurance industry
- Secondary focus is to understand range of industry practices around COVID-19 mortality response

Respondents

- 42¹ respondents working at life insurers (one response per company)
- Actuaries & risk management staff involved in COVID-19 efforts

Approach

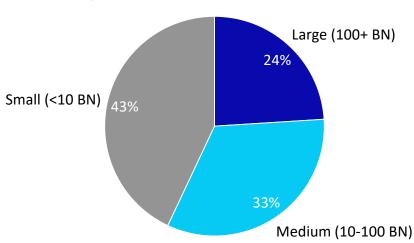
- Multiple choice, rating, or free response questions
- Survey in field April 2-7, 2020

Survey topics

- Key factors for modeling COVID-19 mortality
- Infection rate, CFR, and deaths
- Impact of COVID-19 on mortality claims
- Data sources used for modeling
- Communication with key stakeholder groups

Respondents by company size

Total assets, USD BN



Source: SNL

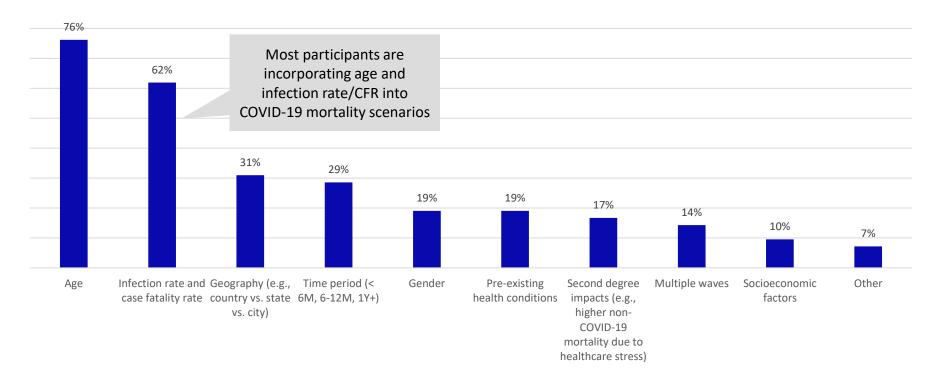
^{1.} To be updated with ~10-15 additional respondents; results expected to be consistent.

INITIAL FINDINGS: COVID-19 MORTALITY SURVEY

1	COVID-19	 COVID-19 mortality modeling based on a wide range of factors >50% of respondents report using age and infection rate/case fatality rate (CFR) 							
	modeling								
2	COVID-19	COVID-19 mortality scenarios for the US for 2020:							
	scenarios	100-250k deaths (baseline) expected by most respondents; worst case scenario of 1-5MM deaths							
		 On average, larger companies expect a more severe worst case scenario; smaller company expectations are distributed across a wider range of possibilities 							
		 Infection rate of <15% (baseline) expected by most respondents; worst case scenario of 25-50% 							
		 Infection rates not expected to vary significantly across age groups 							
		 CFR of .5-2.5% (baseline) expected by most respondents; worst case scenario of 2.5-5% 							
		 CFR expected varies across age groups; relatively higher CFR for ages 40+ in worst case scenario 							
 Claims / impact Larger increase expected for individual life claims vs. group vs. 1-5% for 2020) 		 Larger increase expected for individual life claims vs. group life claims (median expected increase of >10% vs. 1-5% for 2020) 							
		 Range of views on reinsurance: 30% not worried about reinsurers in light of COVID-19; 30% worried about reinsurer financial health, 25% worried change in underwriting standards 							
4	Data / communication	 On average, respondents report using 3 information sources to support COVID-19 efforts; >50% are using government data sources, academic studies, or vendor consultation, with 40% using internal data 							
		 Respondents report daily updates to senior management, monthly board updates, ad hoc updates with regulators and rating agencies 							
		 Questions focused on COVID-19 impact on financial health, modeling efforts, and policyholder behavior 							

AGE AND INFECTION RATE/CFR ARE TOP FACTORS USED TO MODEL COVID-19 MORTALITY

Question 3: What factors are you incorporating in modeling COVID-19 mortality scenarios? (n = 41)



"Other" responses

General increase in mortality due to the impact of multiple waves and second degree impacts

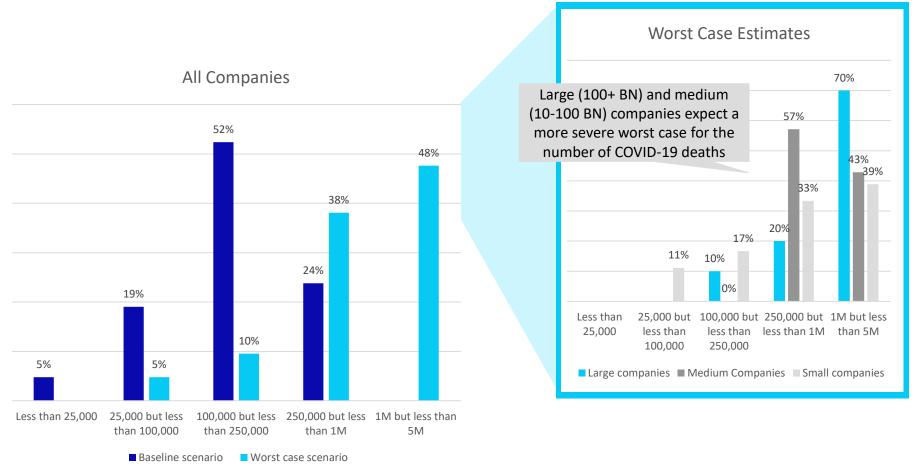
May expand modeling as time permits

We are beginning predictive modeling work that will incorporate many of the additional variable above, though this is not yet complete.

100-250K COVID-19 DEATHS EXPECTED FOR BASELINE SCENARIO; 1-5MM FOR WORST CASE SCENARIO

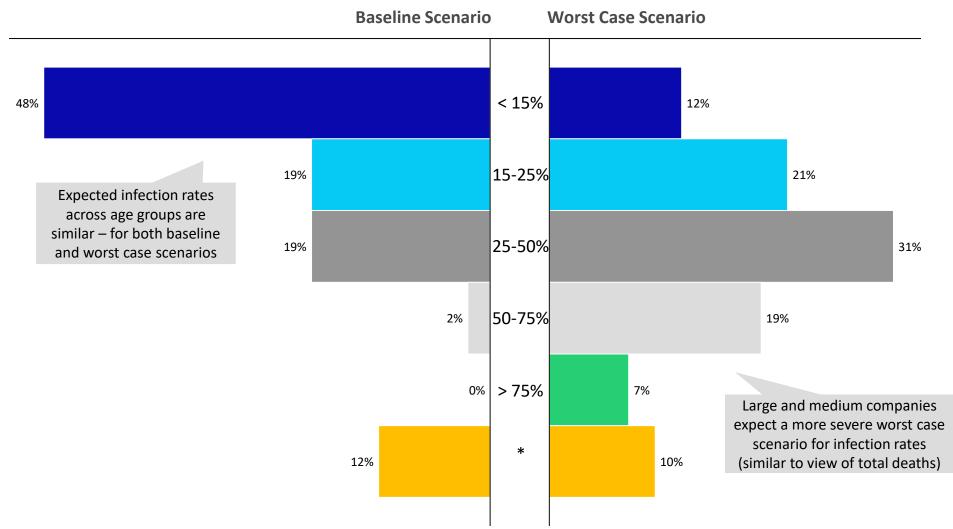
Question 5: Please respond with your view on the ultimate number of COVID-19 deaths for 2020 in the total U.S.

population. (n = 42)



WIDE RANGE OF INFECTION RATES EXPECTED FOR WORST CASE SCENARIO

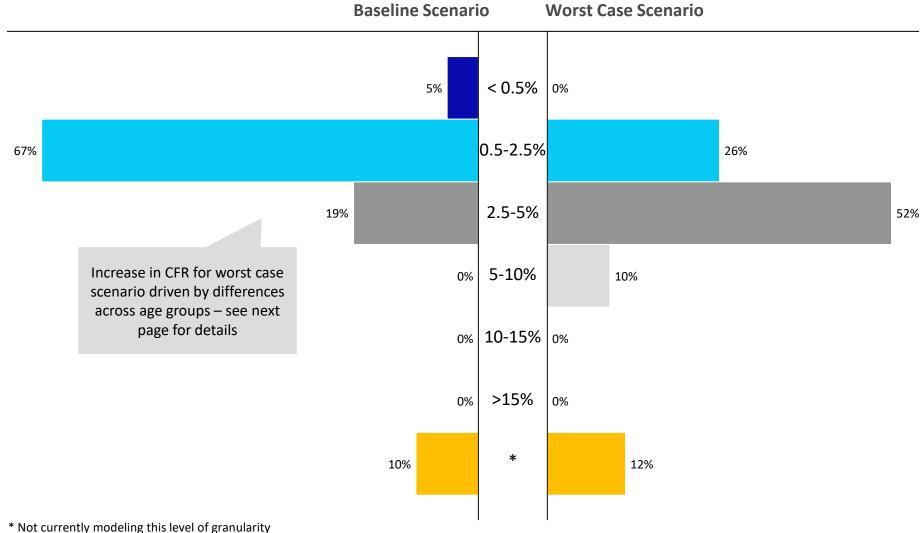
Question 6: Please respond with your view on the ultimate infection rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group) (n= 42)



^{*} Not currently modeling this level of granularity © Oliver Wyman

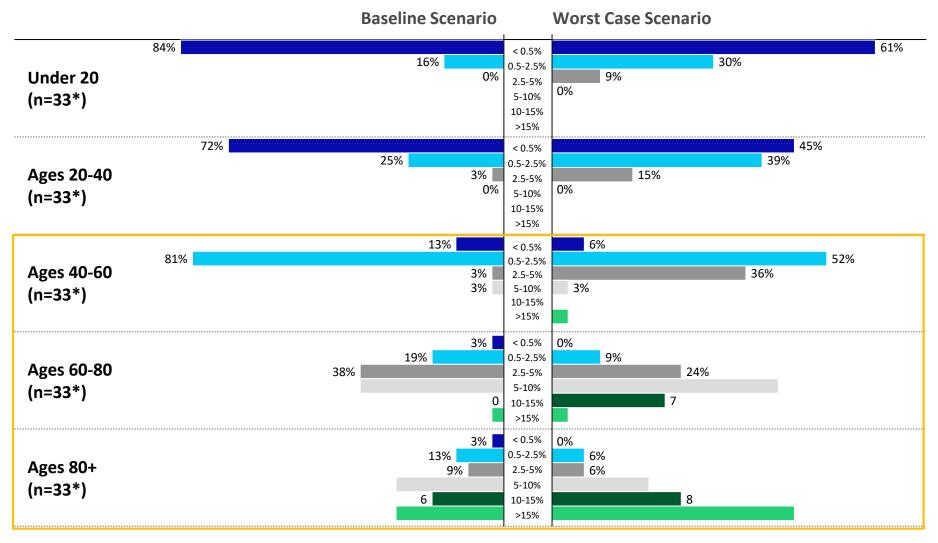
CASE FATALITY RATE MODERATELY HIGHER FOR WORST CASE SCENARIO

Question 7: Please respond with your view on the ultimate case fatality rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group) (n= 42)



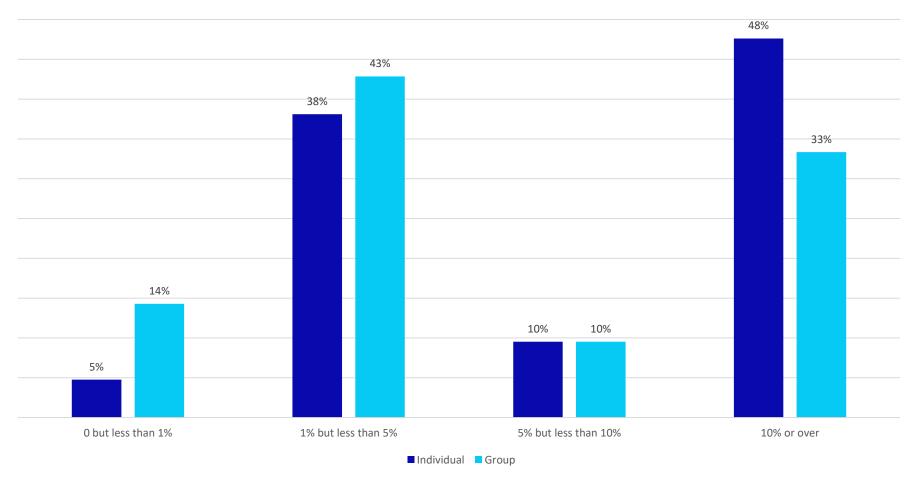
EXPECTED CFR HIGHER FOR AGES 40+, PARTICULARLY FOR WORST CASE SCENARIO

Question 7: Please respond with your view on the ultimate case fatality rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group)



COVID-19 EXPECTED TO HAVE GREATEST IMPACT ON INDIVIDUAL CLAIMS

Question 9: What is your company's current view on the approximate impact of COVID-19 on your company's 2020 individual and group life insurance mortality claims? (% increase in death claims in dollars over 2019) $(n = 21)^1$

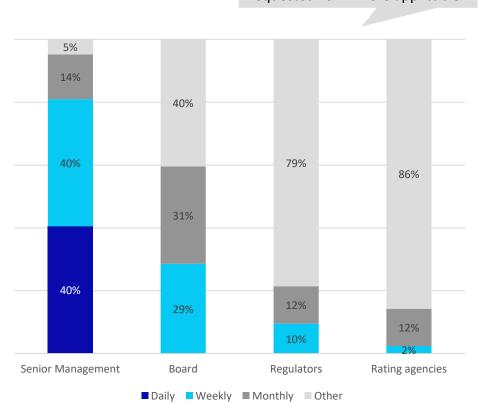


^{1.} Includes companies that offer both individual and group life insurance. Excludes "Other" and "Not modeling COVID-19 at this time" responses.

COMMUNICATION FOCUSED ON FINANCIAL IMPACTS OF COVID-19

Question 13: How frequently are you providing updates to key stakeholder groups regarding preparedness for COVID-19 mortality impacts? (n = 42)

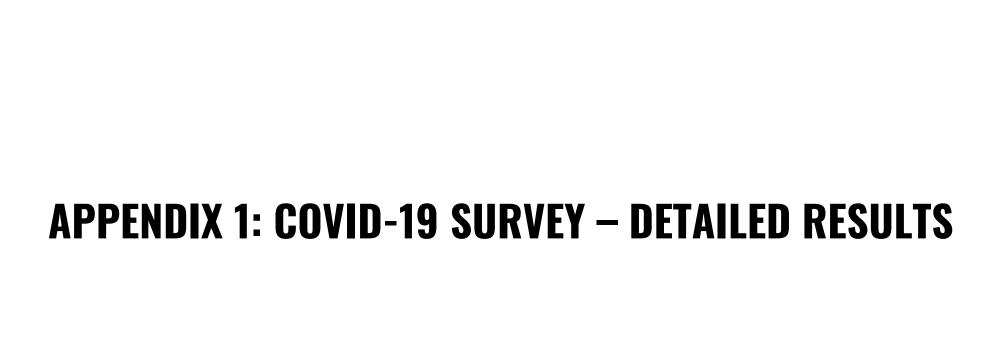
Most "Other" responses are "as requested" or "where applicable"



Category	Sample question				
Size & severity of impact	 What does this mean for our income statement this month, quarter, and year? Expected additional deaths and financial impact of those deaths? 				
Policyholder behavior	 Impact of policyholder behavior changes, including utilization of partial withdrawals or loans, lapse or surrender rates, or premium payment mode? 				
Scenario modeling	 What type of stress tests will be modeled (e.g., pandemic and recession scenarios)? How are we developing statistical analysis without stable and credible data? 				
Investment portfolio credit quality & liquidity	 Is solvency threatened? What are the broader economic impacts, such as credit risk (asset quality), RBC/LIMAT ratios? How will this affect overall financial results? 				
Other	 Will certain other causes of death, such as motor vehicle accidents, decline due to social distancing & shelter-in-place orders? Will others, such as suicide or drug overdose, increase? Exposure in specific geographic areas? 				

OPEN DISCUSSION AND NEXT STEPS

- Any other topics for discussion?
- Proposed agenda for next Working Group call (4/16, 3pm)
 - Key developments from readiness sprints
 - Update on advocacy efforts



COVID-19 SURVEY – DETAILED RESULTS

Section 1: Context

- Overview & company demographics
- Actuarial perspective

Section 2: COVID-19 modeling

- COVID-19 modeling
- COVID-19 modeling factors

Section 3: COVID-19 scenarios

- COVID-19 deaths
- COVID-19 infection rate
- COVID-19 case fatality rate

Section 4: Claims and Impact

- Influenza/pneumonia mortality claims
- Impact on individual & group mortality claims
- Policyholder household income range
- Reinsurance

Section 5: Data and Communications

- Information sources
- Stakeholder updates

OVERVIEW & COMPANY DEMOGRAPHICS

Survey context

Objectives

- Primary focus is on the potential impacts of COVID-19 mortality on the insurance industry
- Secondary focus is to understand range of industry practices around COVID-19 mortality response

Respondents

- 42¹ respondents working at life insurers (one response per company)
- Actuaries & risk management staff involved in COVID-19 efforts

Approach

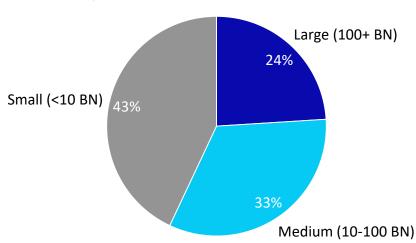
- Multiple choice, rating, or free response questions
- Survey in field April 2-7, 2020

Survey topics

- Key factors for modeling COVID-19 mortality
- Infection rate, CFR, and deaths
- Impact of COVID-19 on mortality claims
- Data sources used for modeling
- Communication with key stakeholder groups

Respondents by company size

Total assets, USD BN

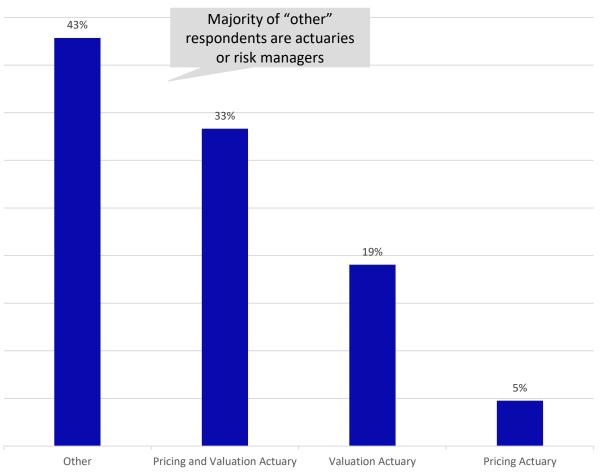


Source: SNL

^{1.} To be updated with $^{\sim}10$ -15 additional respondents; results expected to be consistent.

Q1. ACTUARIAL PERSPECTIVE

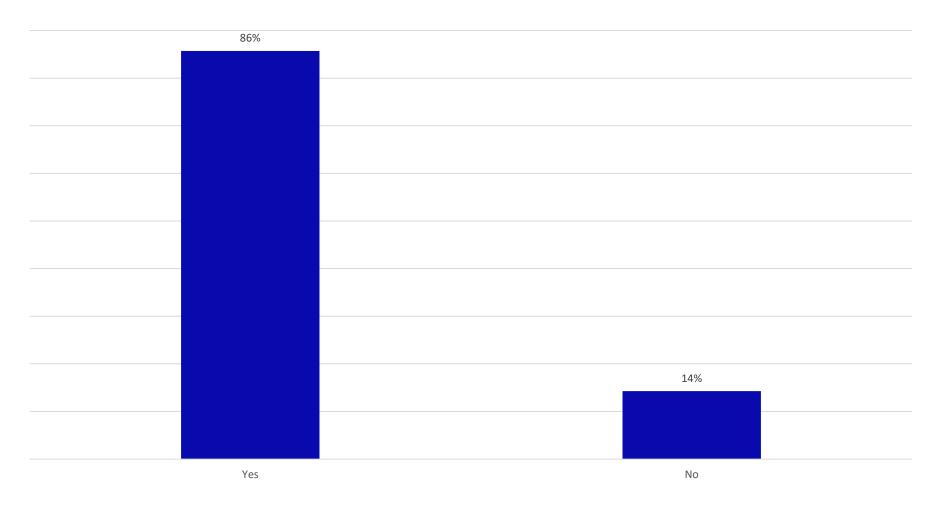
Question 1: From what perspective are you responding to this survey? (n = 42)



"Other" responses
Chief Analytics Officer
Corporate/All Actuarial
Chief Actuary
Assumption setting / experience studies
Risk
Audit and Risk
Enterprise Risk Management and actuary
Retirement Consulting Actuary
Risk Management

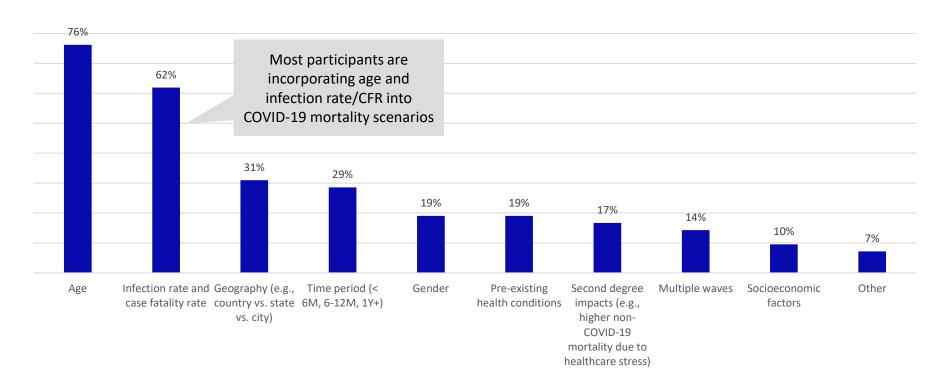
Q2. COVID-19 MODELING

Question 2: Is your company modeling COVID-19 mortality scenarios? (n=42)



Q3. COVID-19 MODELING FACTORS

Question 3: What factors are you incorporating in modeling COVID-19 mortality scenarios? (n = 41)



"Other" responses

General increase in mortality due to the impact of multiple waves and second degree impacts

May expand modeling as time permits

We are beginning predictive modeling work that will incorporate many of the additional variable above, though this is not yet complete.

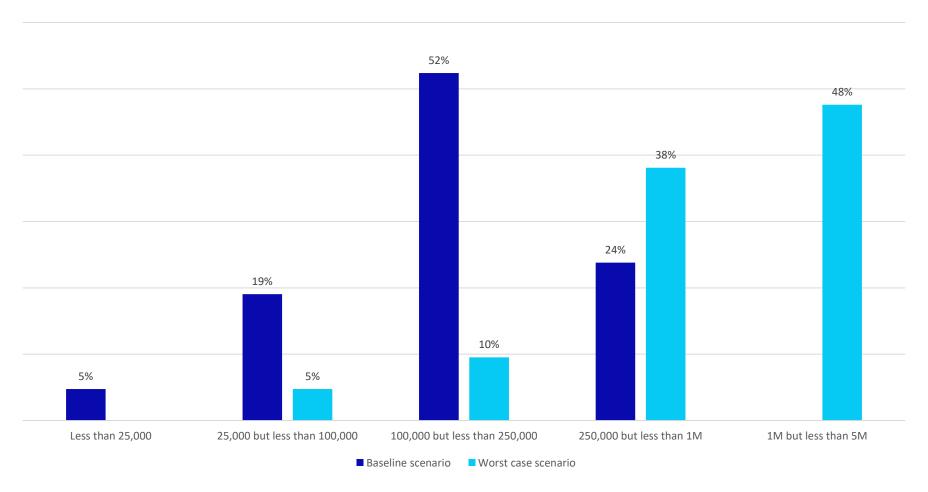
Q4. MODELING FACTORS

Question 4: Please rank the factors you are incorporating in modeling COVID-19 mortality scenarios in order of importance to the model results. (n = 42)

Rank	1st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th	9 th
Age	14	15	2		Most participants ranked age		nked age		
Infection rate and case fatality rate	17	7	2		and in	d infection rate / case ty as the top two factors			
Geography (e.g., country vs. state vs. city)	1	3	6		2	1			
Time period (<6M, 6-12M, 1Y+)	2		4	2	2		1		1
Gender	1	_ 2	1	4	1				
Pre-existing health conditions		2	2	1	3				
Second degree impacts			1	5		1			
Multiple waves		_ 1	_ 1	1		_ 1	1		1
Socioeconomic factors				2				2	

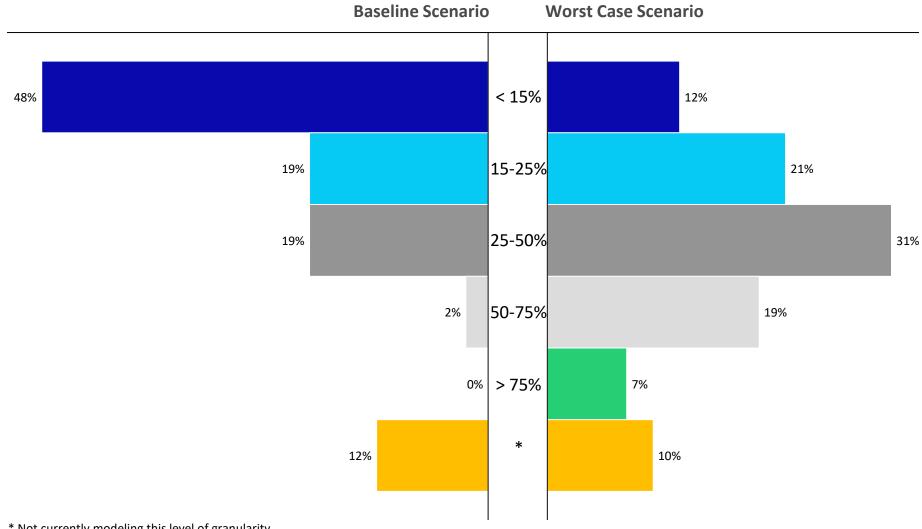
Q5. COVID-19 DEATHS

Question 5: Please respond with your view on the ultimate number of COVID-19 deaths for 2020 in the total U.S. population. (n = 42)



Q6. COVID-19 INFECTION RATES

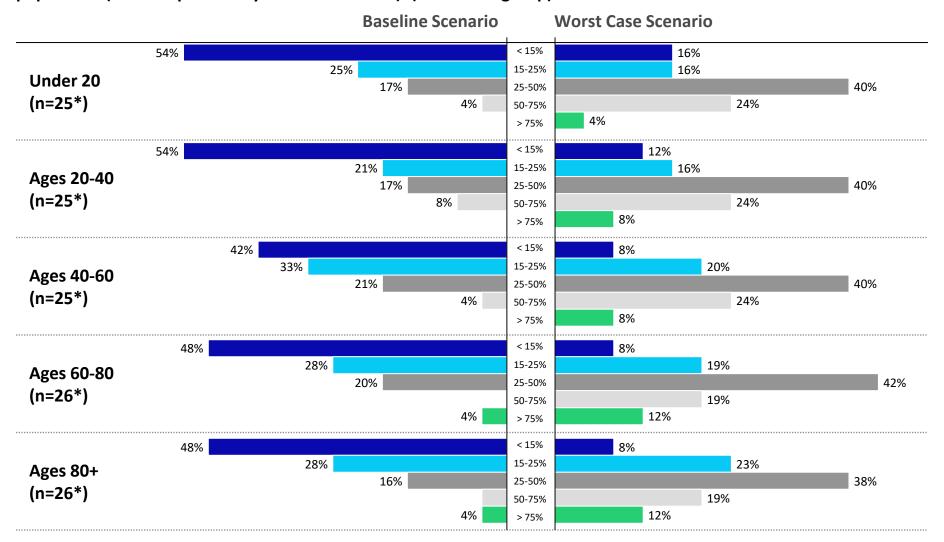
Question 6: Please respond with your view on the ultimate infection rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group) (n= 42)



^{*} Not currently modeling this level of granularity © Oliver Wyman

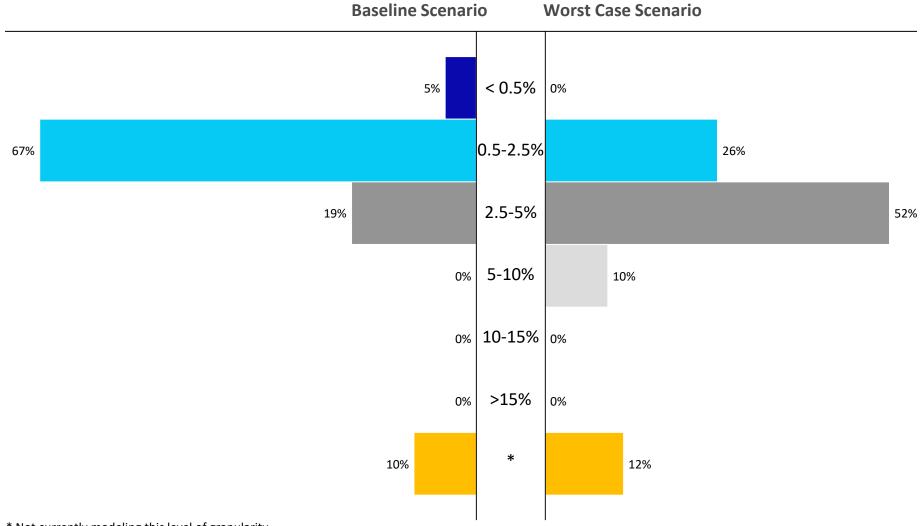
Q6. COVID-19 INFECTION RATES

Question 6: Please respond with your view on the ultimate infection rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group)



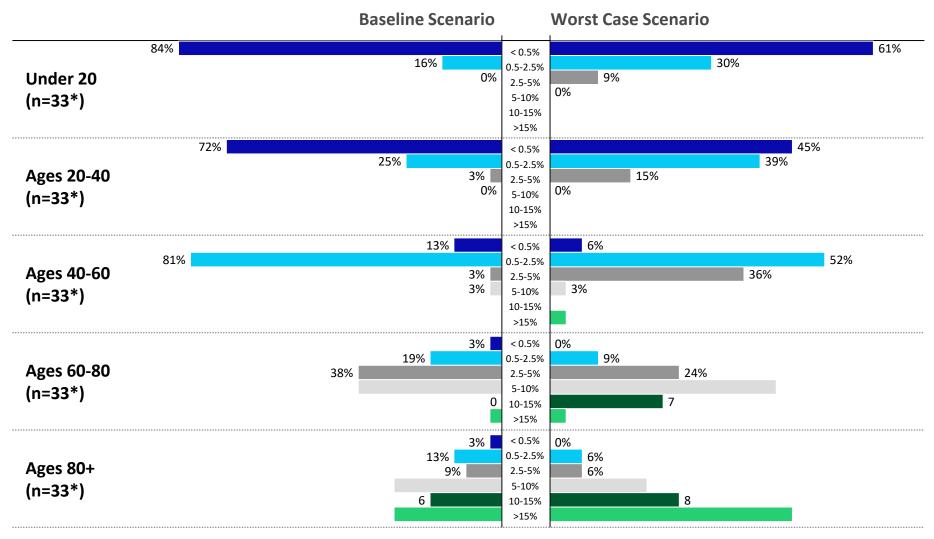
Q7. COVID-19 CFR

Question 7: Please respond with your view on the ultimate case fatality rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group) (n= 42)



Q7. COVID-19 CFR

Question 7: Please respond with your view on the ultimate case fatality rates for COVID-19 for 2020 in the total U.S. population (i.e. not specific to your insured block). (% for each group)



Q6/Q7. INFECTION RATES/CFR

Ultimate infection rates vs. ultimate case fatality rates for COVID-19 for 2020 in the total U.S. population

Baseline Scenario (n=36)

Case Fatality Rates

Infection Rates

	<0.5%	0.5-2.5%	2.5-5%	5-10%	10-15%	>15%
<15%	1	16	2	0	0	0
15%-25%	1	5	2	0	0	0
25%-50%	0	7	1	0	0	0
50%-75%	0	0	1	0	0	0
>75%	0	0	0	0	0	0

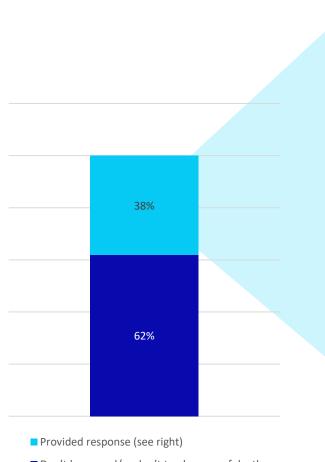
Worst Case Scenario (n=36)

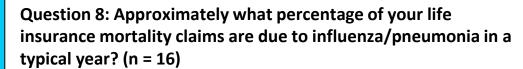
Case Fatality Rates

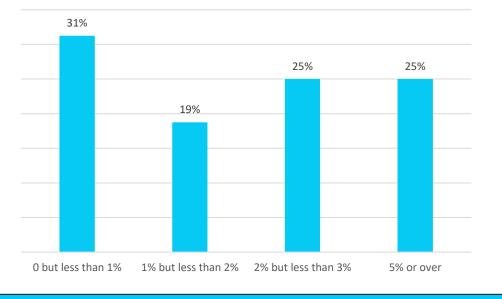
Infection Rates

	<0.5%	0.5-2.5%	2.5-5%	5-10%	10-15%	>15%
<15%	0	0	4	0	0	0
15%-25%	0	3	6	0	0	0
25%-50%	0	6	5	1	0	0
50%-75%	0	2	5	1	0	0
>75%	0	0	1	2	0	0

Q8. INFLUENZA/PNEUMONIA MORTALITY CLAIMS



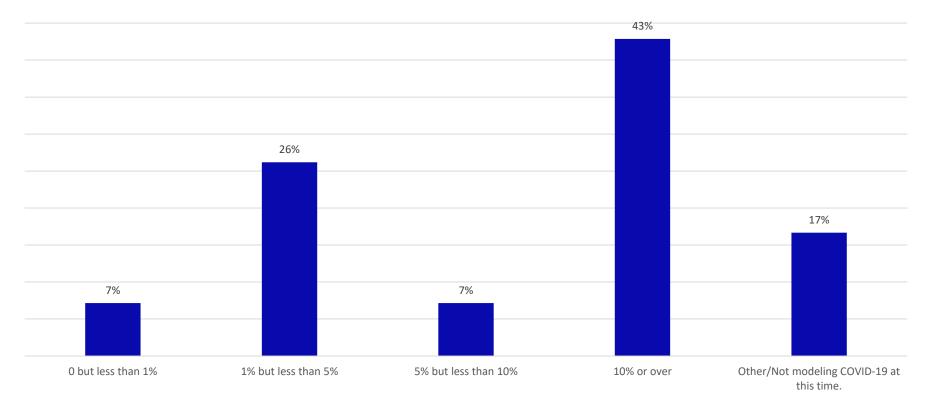




■ Don't know and/or don't track cause of death

Q9. IMPACT ON INDIVIDUAL MORTALITY CLAIMS

Question 9: What is your company's current view on the approximate impact of COVID-19 on your company's 2020 individual life insurance mortality claims? (% increase in death claims in dollars over 2019) (n = 42)¹



Not modeling COVID-19 responses

We have immaterial retained individual life insurance risk

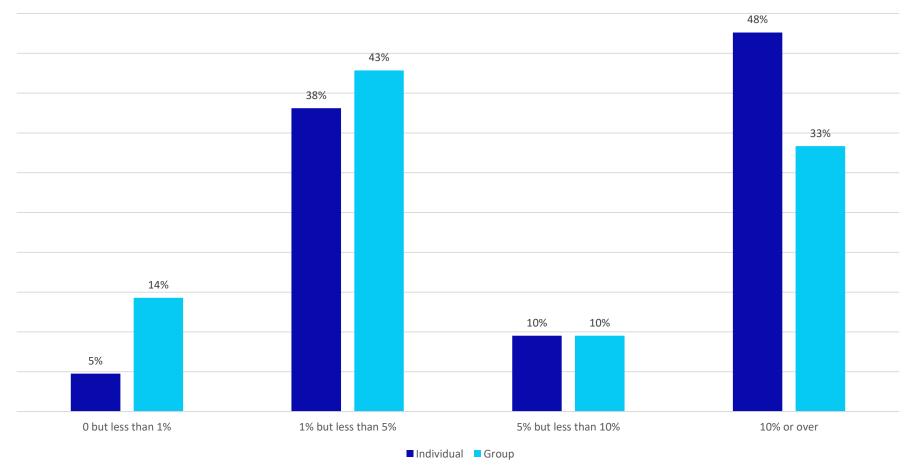
Looking at a range of excess claims

1. Includes companies that offer individual life insurance.

33

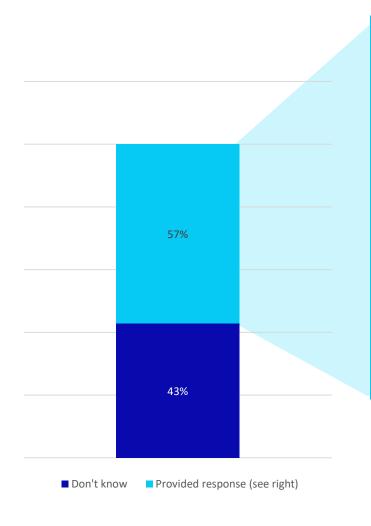
Q9. IMPACT ON INDIVIDUAL & GROUP MORTALITY CLAIMS

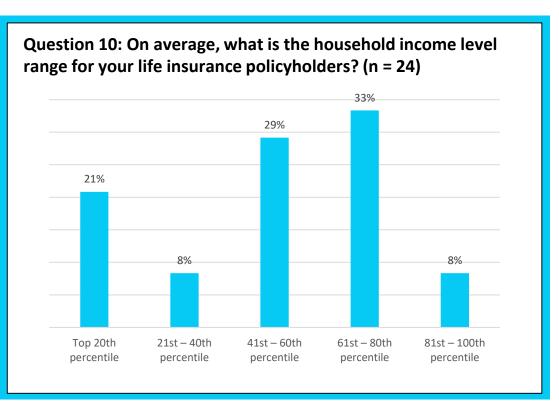
Question 9: What is your company's current view on the approximate impact of COVID-19 on your company's 2020 individual and group life insurance mortality claims? (% increase in death claims in dollars over 2019) $(n = 21)^1$



^{1.} Includes companies that offer both individual and group life insurance. Excludes "Other" and "Not modeling COVID-19 at this time" responses.

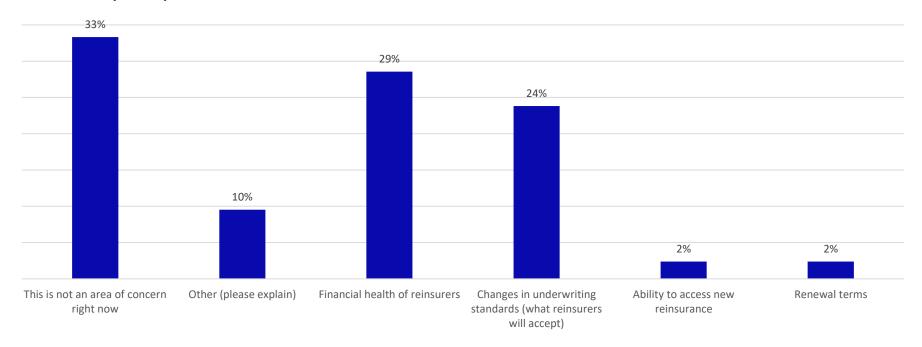
Q10. POLICYHOLDER HOUSEHOLD INCOME RANGE





Q11. REINSURANCE

Question 11: Which of the following best describes your company's biggest concern (if any) related to COVID-19 and reinsurance? (n = 42)

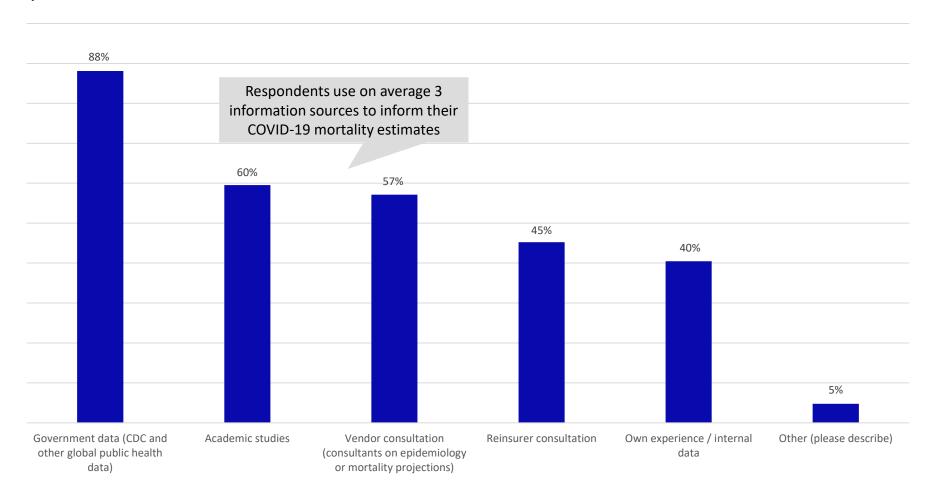


"Other" responses

Lapsation, premium deferral, and investment / credit charges
Premium payment short term for group businesses.
IBNR because we are involved in a sale of the business
Coordination of reinsurance premium with emergency grace period expansions

Q12. INFORMATION SOURCES

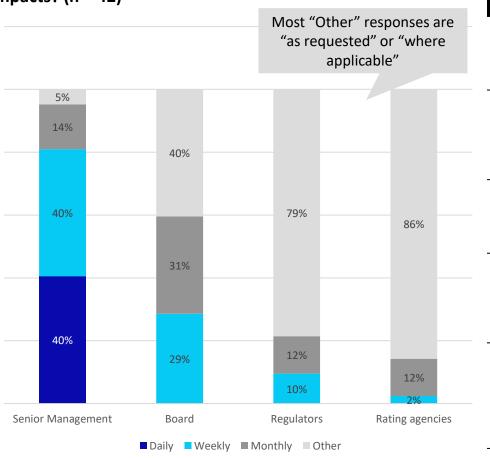
Question 12: What information sources are you using to inform your company's COVID-19 mortality estimates? (n = 42)



Q13. STAKEHOLDER UPDATES

Question 13: How frequently are you providing updates to key stakeholder groups regarding preparedness for COVID-19 mortality

impacts? (n = 42)



Category	Sample question
Size & severity of impact	 What does this mean for income statement this month, this quarter, this year? Expected additional deaths and financial impact of those deaths?
Impact on consumer behavior	 Will other policyholder behaviors change, such as changes in utilization of partial withdrawals or loans, changes in lapse or surrender rates, or changes in premium payment mode?
Scenario modeling	 What type of stress tests will be modeled (e.g., pandemic and recession scenarios)? How are we developing statistical analysis without stable and credible data?
Investment portfolio credit quality & liquidity	 Is solvency threatened? What are the broader economic impacts, such as credit risk (asset quality), RBC/LIMAT ratios? How will this affect overall financial results?
Other	 Will certain other causes of death, such as motor vehicle accidents, decline due to social distancing & shelter-in-place orders? Will others, such as suicide or drug overdose, increase? Exposure in specific geographic areas?

APPENDIX 2: ADVOCACY PRIORITIES

1. Product/Nonforfeiture/ 7702 Issues (1 of 2)

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit Y	Difficu Ity	Depend encies	Updates on Activities
1a	Section 7702 interest rates	Paul Graham Regina Rose Mandana Parsazad	Effective Jan 1, 2021	In Progress	Federal - legislative	45	High	Hard		Joint call of Actuarial, Accounting, and Annuities Committee call 3/30 Calls with LATF and Life RBCWG leadership scheduled for 3/31 and 4/7 to discuss
1b	Life nonforfeiture interest rates	Brian Bayerle Paul Graham	VM-02 fix effective Jan 1, 2021 Need by VM deadline (approximately June LATF adoption)		NAIC - LATF/A Comm	45	High	Easy	1a	Joint call of Actuarial, Accounting, and Annuities Committee call 3/30, Actuarial Committee to form Working Group Calls with LATF and Life RBCWG leadership scheduled for 3/31 and 4/7 to discuss. Working group calls to begin week of 4/6.
1c	Annuity nonforfeiture interest rates	Brian Bayerle Paul Graham	Effective as soon as feasible (late 2021?)		NAIC - LATF/A Comm States - All	45	High	Hard	updated Model #805	Joint call of Actuarial, Accounting, and Annuities Committee call 3/30, Actuarial Committee to form Working Group Calls with LATF and Life RBCWG leadership scheduled for 3/31 and 4/7 to discuss. Working group calls to begin week of 4/6.

1. Product/Nonforfeiture/ 7702 Issues (2 of 2)

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit Y	Difficu Ity	Depend encies	Updates on Activities
1d	Ensure regulatory bandwidth does not prevent required updates to product filings	Wayne Mehlman Paul Graham	Continuous near- term effort		NAIC - LATF/A Comm States - All IIPRC	45-90	High			4/1- Will be reaching out to the Interstate Compact (IIPRC) and the state departments on the expected increase in filings relating to lower interest rates.
1e	Recommendation of the NAIC LTC EX Task Force regarding the development of a consistent national approach for reviewing LTCI rates.	Jan Graeber Paul Graham	Avoid delays in processing rate increase filings		NAIC - LTC EX TF States - All					03/24 ACLI workstream calls to continue efforts of NAIC LTC EX Task Force 04/01 Joint ACLI/AHIP call regarding Louisiana Emergency Rule 40 04/01 ACLI member workstream calls to continue efforts of NAIC LTC EX Task Force 04/02 ACLI member workstream calls to continue efforts of NAIC LTC EX Task Force 04/03 ACLI member workstream calls to continue efforts of NAIC LTC EX Task Force 04/03 ACLI member workstream calls to continue efforts of NAIC LTC EX Task Force

2. Reserve issues

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit Y	Difficu Ity	Depend encies	Updates on Activities
2a	Flooring reserving rate at 0% in the event of negative interest rates	Brian Bayerle Paul Graham	Need by VM deadline (approximately June LATF adoption)		NAIC - LATF/A Comm	45	High			Joint call of Actuarial, Accounting, and Annuities Committee call scheduled for 3/30 to discuss Calls with LATF and Life RBCWG leadership scheduled for 3/31 and 4/7 to discuss
2b	Additional guidance on Asset Adequacy Testing/Cashflow Testing	Brian Bayerle Paul Graham	Guidance by 9/30?		None - Work with the American Academy of Actuaries	45-90	High			Joint call of Actuarial, Accounting, and Annuities Committee call 3/30, Actuarial Committee to form Working Group. Working group calls to begin week of 4/6.
2c	Long Term Care AG 51 Requirements	Jan Graeber Paul Graham	Guidance by 9/30?	In Progress	NAIC - HATF/B Comm					3/26 - Call with HATF leadership on AG 51 reserve guidance

3. Accounting issues (1 of 2)

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit Y	Difficu Ity	Depend encies	Updates on Activities
3a	Delay GAAP Long Duration Targeted Improvements	Mike Monahan Paul Graham	Get FASB agree to additional delay as soon as feasible	In Progress	FASB	45-90	High			3/20 - ACLI submitted letter to FASB 4/08- FASB to meet to discuss "pressing accounting questions"
3b	Accounting treatment consistent with FASB guidance on mortgage relief	Mike Monahan Paul Graham	Work with other trades on response Need by RBC deadline (to sync with RBC item, 6/30)	In Progress	NAIC - SAPWG	45	High			3/24 - ACLI call with Mortgage Bankers Association 3/24 - Statutory Accounting Call to discuss, agreed to draft letter to NAIC 3/25 - Sent letter with join trades to NAIC leadership. NAIC has been responsive 3/27 - NAIC released interpretation for troubled debt restructuring (INT 20- 03T)
3c	Treatment of Current Expected Credit Losses (CECL)	Mike Monahan Paul Graham		In Progress	NAIC - SAPWG	45	High			3/27 - sent letter to FASB 3/31 – ACLI joins with trades in letter to SEC to extend CECL effective date deferral option to all financial institutions. 4/08- FASB to meet to discuss "pressing accounting questions"

3. Accounting issues (2 of 2)

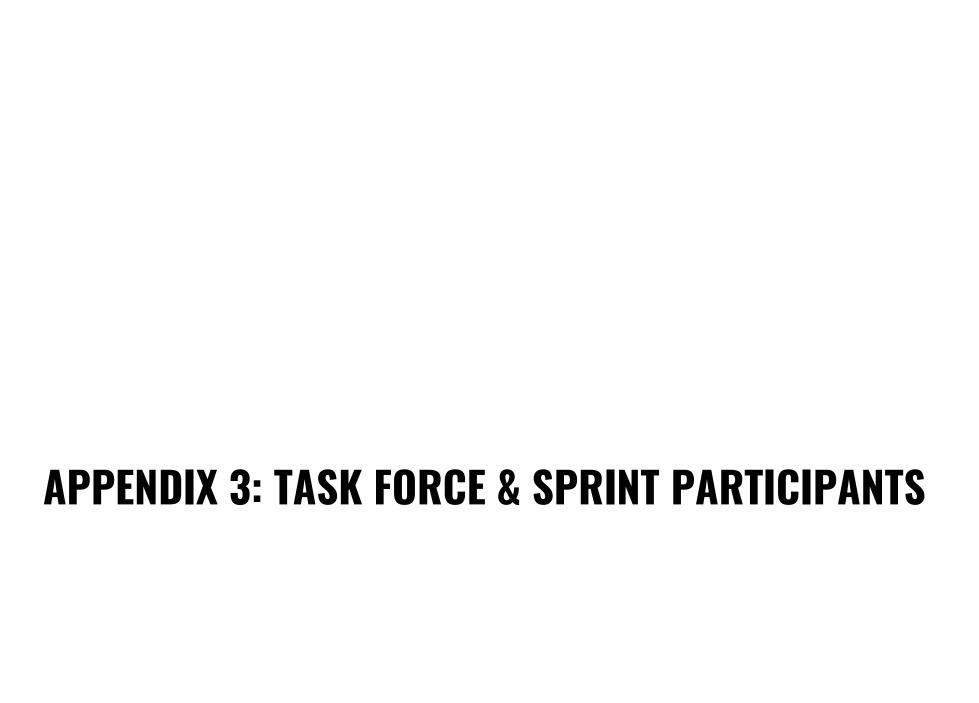
Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit y	Difficu Ity	Depend encies	Updates on Activities
3d	Accounting guidance on delayed premium payments of more than 90 days	Mike Monahan Paul Graham		In Progress	NAIC - SAPWG	45	High			3/27 - NAIC released an interpretation for COVID-19 delayed payments (INT 20-02T)
3e	NAIC SAPWG: Requested an extension of time regarding SAPWG Ref. No. 2019-21: SSAP No. 43R Loan-Backed and Structured Securities overhaul	Mike Monahan Paul Graham		In Progress	NAIC - SAPWG	45	High			3/27- ACLI submitted letter to NAIC SAPWG4/01- NAIC granted ACLI an extension of time
3f	SEC: Requested Uniform Current Expected Credit Loss (CECL) accounting and capital treatment across all financial institutions	Mike Monahan Paul Graham		In Progress	SEC	45	High			3/31- Sent letter with five joint associations to SEC

4. Risk-Based Capital (RBC) Issues

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit Y	Difficu Ity	Depend encies	Updates on Activities
4a	RBC C-1 Bond Factors	Steve Clayburn Paul Graham	Engage third party consultant and defer implementation Avoid YE2020 adoption (CATF would need to adopt by 6/30)	In Progress	NAIC - CATF/E Comm	45	High			3/31 - draft RFP sent to membership for review so outreach to specific regulators can begin 4/6
4b	RBC C-1 Real Estate Factors	Steve Clayburn Paul Graham	Accelerate work in 2020 for YE2021 implementation	In Progress	NAIC - CATF/E Comm	45	High			4/2 - Conference call of members to discuss bifurcated strategy to encourage NAIC to implement a change in RBC for real estate equity for YE 2020
4c	RBC C-2 Longevity Factors	Brian Bayerle Paul Graham	Delay C-2 Longevity until 2021/paired with mortality and correlation factor	In Progress	NAIC - CATF/E Comm	45	High			3/26 - Had call with Life RBC leadership, agree to set factor 0% for YE2020. Need CATF structural adoption by 4/30 to collect data. Factors need exposure by 4/30 by Life RBC.
4d	Fix C-1 Mortgages for temporary relief associated with COVID- 19	Mike Monahan Paul Graham	Work with other trades on response Need by RBC deadline(to sync with RBC item, 6/30)	In Progress	NAIC - CATF/E Comm	45	High			3/24 - ACLI call with Mortgage Bankers 3/24 - Statutory Accounting Call to discuss, agreed to draft letter to NAIC 3/25 - Sent letter with join trades to NAIC leadership. NAIC has been responsive

5. Other issues

Ref	Item	Staff	Objectives	Status	Regulatory Engagement	Timing (days)	Priorit y	Difficu Ity	Depend encies	Updates on Activities
5a	NAIC Economic Scenario Generator	Brian Bayerle Paul Graham	Engage consultant and LATF/LRBC to get favorable outcome for companies Viewed as sufficiently long time horizon	In Progress	NAIC - LATF/A Comm		Low			
5b	VM-51 Experience Reporting	Brian Bayerle Paul Graham	Defer 2020 data collection, optionally at least		NAIC - LATF/A Comm					3/31 – Initial call with NAIC staff mentioning possible optional deferral of 2020 requirements.
5c	Liquidity Stress Testing	Dave Leifer	Reorientation of the NAIC liquidity stress testing	In Progress	NAIC - Liquidity Assessment/E X Comm					3/27 - ACLI Macroprudential Initiative Subgroup and the joint GRMCs plan to submit letter on reorientation of the project week of March 30th.
5d	Joint trade request to Treasury to include commercial mortgages as pledgable collateral for participation in the TALF program	Julie Spiezio Paul Kangus		In Progress	US Treasury					



READINESS & ADVOCACY SUBCOMMITTEE

MEMBERS

Keith Werschke	Pacific Life
Linda Durman	Sammons
Dan Jackson	Athene
Michael Slipowitz	Guardian Life
Stephen Turer	Lincoln
Meagan Phillips	Securian
Bill White	USAA
Ken McCullum	Principal
Todd Henderson	Western & Southern
Dennis Martin	Oneamerica
Tim Corbett	Mass Mutual
Ellen Cooper	Lincoln
Raj Krishnan	F&G Life
Paul Gerard	Ohio National
Liz Brill	NY Life
Tom Leonardi	AIG
Jim Mikus	Ameritas
Cliff Lange	Boston Mutual
Joe Engelhard	Met Life
Joel Steinberg	New York Life

Jason Klawonn	Northwestern Mutual
Connie Tang	Prudential
Karry Sweeney	Athene
Kevin Mechtley	Sammons
Richard (Rich) White	Jackson
Quentin Doll	Northwestern Mutual
Betsy Ward	Mass Mutual
Alison Weiss	Mass Mutual
David Chang	Pacific Life
Adam Brown	Allianz
Don Preston	SwissRe
Marcia Wadsten	Jackson

FACILITATORS

Dave Levenson	LLG
Kristin Ricci	Oliver Myman
Scott Campion	— Oliver Wyman
Paul Graham	ACLI (Advocacy)
Wayne Chopus	IDI (Adversery)
Jason Berkowitz	— IRI (Advocacy)

SPRINT PARTICIPANTS

1. VA/FIA hedging	2. New business & products	3. ALM	4. Cash flow testing	5. COVID-19 morbidity & mortality	6. Social distance & distribution
Participants: 1. Participants: 2. Marcia Wadsten / Angie Matthews, Jackson 3. Stephen Turer,	Participants: 1. Adam Brown, Allianz 2. Cliff Lange, Boston Mutual 3. Stephen Turer,	Participants: 1. Dan Jackson / Jeff	Participants: 1. Michael Harwood, AIG 2. Doug King, Athene 3. Marcia Wadsten, Jackson	Participants: 1. Cliff Lange, Boston Mutual 2. Deborah Vandommelen, Northwestern	Participants: 1. Michael Brodeur / Johnpaul Van Maele, AIG 2. Adam Brown, Allianz
Lincoln 4. Keith Werschke / David Chang, Pacifi	Lincoln 4. Betsy Ward, Mass c Mutual 5. Quentin Doll.	Sammons 4. Bill White, USAA 5. Todd Henderson, Western Southern	 Betsy Ward, Mass Mutual Stephen McNamara, NY Life 	Mutual 3. Joel Sklar, Prudential 4. Meagan Phillips,	Quentin Doll, Northwestern Mutual Steve Rueschhoff.
5. Scott Orr / Chia Yir Chew, MetLife		Life 6. Chris Trost,	6. Linda Durman, Sammons	Securian 5. Bill White, USAA	Edward Jones 5. Paul Mineck,
6. Dan Jackson,Athene7. Connie Tang,	 Jodi Kravitz / Andrew Ng, NY Life David 	Northwestern Mutual 7. Oksana	 7. Aaron Sarfatti, Equitable 8. Michael Slipowitz, 	 6. Amy Rider, Sammons 7. Liz Brill, NY Life 	Allstate 6. Brian Delegat, Nationwide
Prudential 8. Mark Kalinowski,	Lautenschlager, Pacific Life	Cherniavsky, NY Life	Guardian Life 9. Brock Peters,	8. Sam Early, Principal 9. Tim Wood,	7. Jerry Blair / Amy Rider, Sammons
Sammons 9. Steve Cramer / LT	8. Liz Dietrich / Vy Ho, Prudential	8. Ed Freeman, Guardian Life	Prudential 10. Miranda DiMaria / Chris Kinnisan	Protective 10. Dan Harris, Western Southern	8. Anthony Vossenberg, Thrivent
Grant, Protective 10. Jacob Steuber, Western Southern	 Meagan Phillips, Securian Brian Sward, Jackson Katie Bezold, Western & Southern 	9. Steve Cramer / Adam Adrian / Lance Black, Protective	Chris Kinnison, Principal	Western Southern	9. Steve Sanders, F&G Life 10. Phil Pellegrino, UBS 11. Joe Toledano, Morgan Stanley
	Wayne Chopus / Frank O'Connor, IRI				Jason Berkowitz / Wayne Chopus, IRI

QUALIFICATIONS, ASSUMPTIONS AND LIMITING CONDITIONS

This report is for the exclusive use of the Oliver Wyman client named herein. This report is not intended for general circulation or publication, nor is it to be reproduced, quoted or distributed for any purpose without the prior written permission of Oliver Wyman. There are no third party beneficiaries with respect to this report, and Oliver Wyman does not accept any liability to any third party.

Information furnished by others, upon which all or portions of this report are based, is believed to be reliable but has not been independently verified, unless otherwise expressly indicated. Public information and industry and statistical data are from sources we deem to be reliable; however, we make no representation as to the accuracy or completeness of such information. The findings contained in this report may contain predictions based on current data and historical trends. Any such predictions are subject to inherent risks and uncertainties. Oliver Wyman accepts no responsibility for actual results or future events.

The opinions expressed in this report are valid only for the purpose stated herein and as of the date of this report. No obligation is assumed to revise this report to reflect changes, events or conditions, which occur subsequent to the date hereof.

All decisions in connection with the implementation or use of advice or recommendations contained in this report are the sole responsibility of the client. This report does not represent investment advice nor does it provide an opinion regarding the fairness of any transaction to any and all parties.