



DOMESTIC AND FOREIGN INSURERS BULLETIN NO. 118

**TO: ALL INSURANCE COMPANIES AUTHORIZED TO TRANSACT
BUSINESS IN DELAWARE**

**RE: COMPLIANCE WITH REGULATORY FILING REQUIREMENTS
DURING THE COVID-19 (CORONAVIRUS) CRISIS**

DATED: April 9, 2020

Beginning on Friday, March 13, 2020 at 8 a.m., Delaware has been under a State of Emergency to prevent the spread of coronavirus (COVID-19) in Delaware. The Delaware Department of Insurance (the Department) has already issued the following COVID-19-related guidance to carriers, all of which may be downloaded from the Bulletins link of the Legal dropdown menu on the Department's website, insurance.delaware.gov:

- Domestic and Foreign Insurers Bulletin No. 115 - Coverage for COVID-19 (Coronavirus);
- Domestic and Foreign Insurers Bulletin No. 116/Producers and Adjusters Bulletin No. 32 – Additional Guidance Relating to COVID-19 (Coronavirus); and
- Domestic and Foreign Insurers Bulletin No. 117/Producers and Adjusters Bulletin No. 33 - Compliance with Regulatory Requirements During The Covid-19 (Coronavirus) Crisis.

The purpose of this Bulletin is to provide insurers with guidance regarding compliance with various regulatory filing deadlines during the COVID-19 public health emergency. This Bulletin is being provided in addition to, but not in place of, any prior guidance previously issued by Bulletin.

Pursuant to this Bulletin, the Department is allowing insurers to request an extension of certain filing deadlines by an additional 30 to 60 days, depending on the type of filing. This flexibility is being provided in part in recognition that the Department and other state Departments of Insurance are likely to increase targeted information requests to gather COVID-19-specific information as the crisis progresses, and insurer's prompt attention to those information requests will be greatly appreciated.

NOTE: This Bulletin is intended solely for informational purposes. It is not intended to set forth legal rights, duties, or privileges, nor is it intended to provide legal advice. Readers should consult applicable statutes and rules and contact the Delaware Department of Insurance if additional information is needed.

◆INSURANCE.DELAWARE.GOV◆

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An insurer who believes that it will be unable to meet the financial filing deadlines required by law or by order must request a filing deadline extension from David Lonchar, Director of the Bureau of Company Examination, Rehabilitation & Guaranty, by sending an email to dave.lonchar@delaware.gov. The Department reserves the right to reject any filing deadline extension request based upon the financial condition and unique circumstances of the applicant company that the Department deems applicable to that company.

Regardless of whether the Department grants an extension request, companies are still required to make all required electronic filings with the NAIC (e.g., quarterly financial statements, audited financial statements) in accordance with NAIC filing deadlines.

A. Filings for which a 30-day filing deadline extension may be requested

Name of Filing	Existing Filing Deadline	Extended Filing Deadline
Combined Annual Statement Filing (Property)	April 1, 2020	May 1, 2020
Combined Insurance Expense Exhibit (Property)	April 1, 2020	May 1, 2020
Accountant's Letter of Qualifications (Property, Life/Fraternal, Health)	May 1, 2020	June 1, 2020
PBR Exemption filing due to state July 1, 2020 and to NAIC August 15, 2020 (Life/Fraternal)	July 15, 2020	August 15, 2020

B. Filings for which a 60-day filing deadline extension may be requested

Name of Filing	Existing Filing Deadline	Extended Filing Deadline
Audited Financial Report (Property, Life/Fraternal, Health)	June 1, 2020	August 1, 2020
Communication of Internal Control Related Matters Noted in Audit (Property, Life/Fraternal, Health)	August 1, 2020	October 1, 2020
Corporate Governance Annual Disclosure	June 1, 2020	August 1, 2020
Form B Registration Statement & Related Form C	June 1, 2020	August 1, 2020
Risk Assessment Report (Form F)	June 1, 2020	August 1, 2020

C. Filing deadlines for the components of the **2019 annual filings that, if applicable,** should be submitted **only to an insurer's state of domicile**

Name of Filing	Original Filing Deadline	Extended Filing Deadline
Actuarial Memorandum Required by Actuarial Guideline XXXVIII 8D (Life/Fraternal)	March 30, 2020	April 30, 2020
Management's Report of Internal Control Over Financial Reporting (Property, Life/Fraternal, Health, Title)	July 1, 2020	August 1, 2020

D. List of **2020 NAIC quarterly** electronic filings that are currently due on May 15, 2020 and that may be extended for 30 days

Name of Statement	Insurance Lines	Quarter Ending
Quarterly Statement Filing	Property, Life/Fraternal, Health	As of March 31, 2020
Trusted Surplus Statement	Property, Life/Fraternal	March 31, 2020
Supplement A to Schedule T (Medical Professional Liability Supplement)	Property, Life/Fraternal	March 31, 2020
Medicare Part D Coverage Supplement	Property, Life/Fraternal, Health	March 31, 2020
Reasonableness of Assumptions Certification Required by Actuarial Guideline XXXV	Life/Fraternal	March 31, 2020
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV	Life/Fraternal	March 31, 2020
Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method Required by Actuarial Guideline XXXVI	Life/Fraternal	March 31, 2020
Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Average Market Value)	Life/Fraternal	March 31, 2020

Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Market Value)	Life/Fraternal	March 31, 2020
Director and Officer Insurance Coverage Supplement	Property	March 31, 2020

This Bulletin shall be effective immediately and shall remain in effect unless withdrawn or superseded by subsequent law, regulation or bulletin.

Trinidad Navarro

Trinidad Navarro
Delaware Insurance Commissioner