

## TITLE COMPANIES

COMPANY NAME: \_\_\_\_\_ NAIC Company Code: \_\_\_\_\_

Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

Required Filings in the State Of: Pennsylvania Filings Made During the Year 2024

### PENNSYLVANIA DOMESTIC FILERS:

Electronic filings are requested for all required filing documents. Further:

1. Filings which are submitted to the NAIC are considered to be simultaneously filed with the PA Commissioner and are not to be submitted again to the PA Department nor to the NAIC. The NAIC filing satisfies the requirement for these submissions.
2. All\* financial filings for PA Title Insurance Companies which are not otherwise submitted to the NAIC are to be emailed to:

RA-IN-LIFE-FRTRNL-TITL@Pa.gov

- a. Emailed filings are to be in PDF format.
- b. ZIP files cannot be accepted through the firewall, please do not send. Encrypted files can be accepted and are preferable over a secured portal process.
- c. The email subject line should begin with the NAIC code followed by the legal entity name.
- d. Filing emails to PA should include only a single legal entity and not combine filers.
- e. The document file name for each item should begin with the NAIC code and a brief document description. (i.e., 55555 Biz Plan)

**\*NOTE:** Filers using Gain Compliance have a reporting feature to submit state specific filings through a zip submission process directly to the NAIC.

3. Hard copy filings are optional, and a copy can be sent to **ATTN: Administration**, PA Insurance Department, 1326 Strawberry Square, Harrisburg, PA 17120.
4. The scanned documents submitted should reflect the appropriate wet signatures and notary requirement. A scanned copy of the original signature is permitted.
5. Filing fees will be invoiced by the Department with remittance instructions, please do not include payment with a hardcopy filing. A scan of payment can be included with the electronic filing.
6. Questions can be emailed to the Company's assigned analyst, supervisor, or submitted to RA-IN-ANALYSIS@PA.gov

**FOREIGN/ALIEN FILERS:** – Filings which are submitted to the NAIC are considered to be simultaneously filed with the PA Commissioner and are not to be submitted again to the PA Department nor to the NAIC. The NAIC filing satisfies the requirement for these submissions.

(1) Checklist	(2) Line #	(3) REQUIRED FILING FOR THE ABOVE STATE	(4) NUMBER OF COPIES*			(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES
			Domestic		Foreign			
			State	NAIC	State			
		<b>I. NAIC FINANCIAL STATEMENTS</b>						
	1	Annual Statement (8 ½" x 14")	EO	EO	EO	3/1	NAIC	A – M, Q
	1.1	Printed Investment Schedule detail (Pages E01-E29)	EO	EO	EO	3/1	NAIC	
	2	Quarterly Financial Statement (8 ½" x 14")	EO	EO	EO	5/15, 8/15, 11/15	NAIC	A – M, Q
		<b>II. NAIC SUPPLEMENTS</b>						
	11	Actuarial Opinion	EO	EO	N/A	3/1	Company	
	12	Investment Risk Interrogatories	EO	EO	N/A	4/1	NAIC	
	13	Management Discussion & Analysis	EO	EO	N/A	4/1	Company	
	14	Schedule SIS	EO	N/A	N/A	3/1	NAIC	

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			Domestic		Foreign			
			State	NAIC	State			
	15	Supplemental Compensation Exhibit	EO	N/A	N/A	3/1	NAIC	O
	16	Supplemental Schedule of Business Written by Agency	N/A	N/A	N/A	4/1	NAIC	
		<b>III. ELECTRONIC FILING REQUIREMENTS</b>						
	61	Annual Statement Electronic Filing	N/A	EO	N/A	3/1	NAIC	
	62	March .PDF Filing	N/A	EO	N/A	3/1	NAIC	
	63	Supplemental Electronic Filing	N/A	EO	N/A	4/1	NAIC	
	64	Supplemental .PDF Filing	N/A	EO	N/A	4/1	NAIC	
	65	Quarterly Statement Electronic Filing	N/A	EO	N/A	5/15, 8/15, 11/15	NAIC	
	66	Quarterly .PDF Filing	N/A	EO	N/A	5/15, 8/15, 11/15	NAIC	
	67	June .PDF Filing	N/A	EO	N/A	6/1	NAIC	
		<b>IV. AUDIT/INTERNAL CONTROL RELATED REPORTS</b>						
	81	Accountants Letter of Qualifications	EO	EO	N/A	6/1	Company	R
	82	Audited Financial Reports	EO	EO	N/A	6/1	Company	R
	83	Audited Financial Reports Exemption Affidavit	N/A	N/A	N/A		Company	R
	84	Communication of Internal Control Related Matters Noted in Audit	EO	EO	N/A	8/1	Company	R
	85	Independent CPA (change)	EO	N/A	N/A		Company	R
	86	Management's Report of Internal Control Over Financial Reporting	EO	N/A	N/A	8/1	Company	R
	87	Notification of Adverse Financial Condition	EO	N/A	N/A		Company	R
	88	Request for Exemption to File	EO	N/A	N/A		Company	R
	89	Relief from the five-year rotation requirement for lead audit partner	EO	EO	N/A	3/1	Company	R
	90	Relief from the one-year cooling off period for independent CPA	EO	EO	N/A	3/1	Company	R
	91	Relief from the Requirements for Audit Committees	EO	EO	N/A	3/1	Company	R
		<b>V. STATE REQUIRED FILINGS</b>						
	101	Corporate Governance Annual Disclosure	N/A	N/A	N/A	6/1	Company	Z
	102	Filings Checklist (with Column 1 completed)	N/A	N/A	N/A		State	
	103	Form B-Holding Company Registration Statement	EO	N/A	N/A	3/31	Company	U
	104	Form F-Enterprise Risk Report	EO	N/A	N/A	3/31	Company	U
	105	ORSA	EO	N/A	N/A		Company	N
	106	State Filing Fees	1	N/A	1	Invoiced	State	C
	107	Signed Jurat	EO	N/A	EO	3/1	NAIC	G, H, I, M
	108	ORSA Summary Report Notice of Filing	EO	N/A	N/A	6/1	Company	N
	109	Accountant's "Awareness" Letter	EO	N/A	N/A		Company	R
	110	Exemption from Prohibited Non-Auditing Services	EO	N/A	N/A	6/1	Company	R
	111	Request to Extension to Filing	EO	N/A	N/A	5/21	Company	R
	112	Biographical Affidavits	EO	N/A	N/A		NAIC	V
	113	Certificate of Advertising Compliance	EO	N/A	EO	3/1	Company	W
	114	Changes in Governance	EO	N/A	EO		Company	X
	115	Notification of Address Changes	EO	N/A	EO		NAIC	Y
	116	Legal Entity Grid	EO	N/A	N/A	7/1	State	U
	117	Premium Tax <b>Do Not file with the Insurance Department</b>	See Note D	N/A	See Note D		State	D
	118	Certification of Broker Controlled Insurers	EO	N/A	N/A	4/1	State	BB
	119	Group Capital Calculation	EO	N/A	N/A	PA has not yet adopted		

**LEGEND:**

**N/A:** The filing is not required in Pennsylvania for the filer type. It may be required by the domiciliary state.

**EO:** Electronic Only filing. Filings submitted to the NAIC satisfy Pennsylvania's filing requirement. Property 7 Casualty filings which are not otherwise submitted to the NAIC are to be emailed to Pennsylvania at [RA-IN-LIFE-FRTRNL-TITL@Pa.gov](mailto:RA-IN-LIFE-FRTRNL-TITL@Pa.gov). In the alternative to EO for non-NAIC submitted documents, 2 hardcopies may be mailed to the Department.

**NAIC:** Form Source is the NAIC authorized vendor.

**NOTES:**

- Pennsylvania has adopted the NAIC Corporate Governance Annual Disclosure Model (“CGAD”) and annual disclosure is required of all insurers or insurance groups by June 1. The CGAD is a state filing and is not submitted to the NAIC. Note however, when prepared at the Group level, the CGAD is only required to be filed with the Group’s lead state but may also be submitted to Pennsylvania.
- Pennsylvania requires an annual Form F filing by Holding Company Groups. Consistent with the Form B filing requirements, the Form F is a state filing only and is not filed with the NAIC. Note: Form F is only required to be filed with the Group’s lead state but may also be submitted to Pennsylvania.
- Pennsylvania has adopted the NAIC’s Risk Management and Own Risk and Solvency Assessment Model Act (“ORSA”). The ORSA report is required annually by insurers and insurance groups meeting the established premium threshold established for the filing year. The ORSA is a state filing and is not submitted to the NAIC. Note however, when prepared at the Group level, the ORSA is only required to be filed with the Group’s lead state but may also be submitted to Pennsylvania. ORSA filers are to notify the Department of the expected filing date by June 1 (pursuant to 40 P.S. § 991.2605). and the filings are requested to be submitted no later than October 1.
- Refer to the 2022 NAIC *Annual Statement Instructions* and the 2023 NAIC *Quarterly Statement Instructions* for further guidance or contact the Company’s assigned PID analyst for further clarification.

		<b>NOTES AND INSTRUCTIONS (A-M, Q APPLY TO ALL FILINGS)</b>	
	A	<p>Required Domestic Filings Contact Person:</p> <p>Required Foreign Filings Contact Person:</p>	<p>Title Companies Financial Analysis Division E-Mail : RA-IN-ANALYSIS@PA.gov</p> <p><u>Company Licensing Divison</u> <u>E-mail : RA-IN-COMPANYLICENSE@PA.GOV</u></p>
	B	Domestic Insurers	<p><b>State:</b> Title Companies ATTN: Administration 1100 Walnut Street, Suite 1500 Pennsylvania Insurance Department Kansas City, MO 64106-2197 1326 Strawberry Square Phone: 816.783.8600 Harrisburg, PA 17120</p> <p><b>NAIC:</b> NAIC Data Base</p> <p><b>State:</b> Company Licensing Division-for any questions or for filings not submitted to the NAIC E-mail : <u>RA-IN-COMPANYLICENSE@PA.gov</u></p>
	C	Filing Fees:	<p><b>NOTE:</b> Invoices will be issued electronically no later than March 31, 2023, to the contact on record detailing the applicable annual statement/license renewal fees. Please do not remit payment in advance of the invoice.</p> <p>There is a \$750 Annual Statement filing fee. The invoice for <b>Foreign/Alien</b> companies will have an additional \$100 fee for renewal of the Certificate of Authority.</p> <p>The Certificates of Authority for foreign insurers are not mailed but can be printed at any time by the Company. Annual renewal invoices will contain instructions for on-line printing of the foreign insurer’s renewed Certificate of Authority.</p> <p>Questions regarding the filing fees:</p>

			<p>Company Licensing Division  Phone at 717.787.2735  E-Mail: RA-IN-COMPANYLICENSE@PA.GOV</p>
	D	Mailing Address for Premium Tax Payments:	<p>Premium tax filings are not processed by the Insurance Department. Rather, these are to be mailed to the address below:  PA Department of Revenue  327 Walnut Street Floor 12  PO Box 280407  Harrisburg, PA 17128-2005</p> <p>See: <a href="http://www.revenue.pa.gov">http://www.revenue.pa.gov</a> or submit questions to: <a href="https://re-venue-pa.custhelp.com/">https://re-venue-pa.custhelp.com/</a></p> <p>Note: Receipt of filing with the PA Department of Revenue does not satisfy filing requirements of the Insurance Department. Filings received by the Department after March 1, may be penalized as authorized by law. 40 P.S. § 443(e)(1) and 40 P.S. § 991.1410 – not to exceed \$200 per day.</p>
	E	Submission Instructions:	<p>All filings must be electronically submitted to the NAIC or to the email account <a href="mailto:RA-IN-LIFE-FRTRNL-TITL@PA.gov">RA-IN-LIFE-FRTRNL-TITL@PA.gov</a> on or prior to the indicated due date. If the due date is on a weekend or holiday, the due date is extended to the next business day.</p>
	F	Late Filings:	<p>Late filings will be penalized as authorized by law. 40 P.S. § 443(e)(1) and 40 P.S. § 991.1410 – not to exceed \$200 per day.</p>
	G	Original Signatures:	<p>A scanned copy of the original signature is permitted. Filings may not carry stamped facsimile signatures.</p>
	H	Signature/Notarization/Certification:	<p>The following three officers, or a person(s) performing similar functions, of Pennsylvania domiciled insurers are required to certify on the Jurat Page, Quarterly and Annual Financial Statements filed with Pennsylvania Insurance Department, NAIC and other states:</p> <ol style="list-style-type: none"> <li>1) Chief Executive Officer</li> <li>2) Chief Financial Officer</li> <li>3) Corporate Secretary</li> </ol> <ul style="list-style-type: none"> <li>• If the Company does not utilize the above titles, please notify the Financial Analysis Division and explain how the positions of the individuals signing the financial statement perform similar functions to a CEO (President), CFO (Treasurer) or Secretary.</li> <li>• Individuals performing the duties of both CFO and Secretary must sign separately under each title.</li> <li>• Appropriate notarization is required.</li> <li>• The name and address of any consulting person or organization who participated in the preparation of the annual statement must be noted on the Jurat Page of the statement.</li> <li>• PA has no requirements that individuals must be listed in the “Other” category.</li> </ul> <p><b>Foreign/Alien Insurers:</b> If your domestic state accepts less than three signatures on the Jurat Page, please provide proof of this with your submission to PA.</p>

I	Amended Filings:	<ul style="list-style-type: none"> <li>Domestic company amended items must be filed with Pennsylvania and the NAIC. Amendments are to be filed along with a letter of explanation for each amended item and a statement as to what impact the amendments had on the year end Risk Based Capital Report. Only the amended pages should be filed.</li> <li>If any amendments are determined by the company to impact the results of the RBC calculation as reported on the Five-Year Historical page of the annual statement, then a revised RBC report must be filed along with an amended Five-Year Historical page with Pennsylvania and the NAIC.</li> <li>A new Jurat page completed in all respects, must accompany all amendments. Signature requirements for the original filing noted above in Notes G and H should be followed for any amendment.</li> <li>Foreign /Alien Insurers are not required to submit any additional filings for amendments.</li> </ul>
J	Exceptions from normal filings:	Please note that there is no provision in the insurance laws of Pennsylvania that permit granting an extension for the filing of the annual or quarterly statements.
K	Bar Codes (State or NAIC):	Required for PA and NAIC filings. Please follow the instructions in the NAIC <i>Annual Statement Instructions</i> .
L	NONE Filings	Blank items, i.e., schedules, interrogatory responses, supplemental compensation exhibit or Notes to the Financial Statements will not be considered properly filed. If no entries are to be made, write "None", "Not Applicable" or "No Changes" to complete the item in accordance with the NAIC <i>Annual and Quarterly Statement Instructions</i> .
M	Vendors for Blanks	<p>The NAIC provides a list of vendors of annual, quarterly and risk-based capital soft <a href="http://www.naic.org/industry_filing_participation_vendors.htm">http://www.naic.org/industry_filing_participation_vendors.htm</a></p> <p>The Department does not endorse or promote any individual private software vendor.</p>
N	ORSA	ORSA filers are to notify the Department of the expected filing date by June 1 (pursuant to 40 P.S. § 991.2605), and filings are requested to be received no later than October 1. For guidance in preparing the ORSA, see the "ORSA Guidance Manual" on the NAIC website.
O	Supplemental Compensation Exhibit	<p>Part 1, Part 2, and Part 3 follow the NAIC <i>Annual Statement Instructions</i>.</p> <p>Part 2 modification ONLY for Pennsylvania domestic insurers that are licensed in Pennsylvania and are required to file the Supplemental Compensation Exhibit.</p> <p>Insurers shall disclose the compensation of:</p> <ol style="list-style-type: none"> <li>The chief executive officer,</li> <li>Up to four additional persons, regardless of amount, in the following sequence: <ol style="list-style-type: none"> <li>Remaining officers whose compensation is not limited to a de minimis fee for attendance at meetings of the board of directors,</li> <li>Non-officer employees whose compensation exceeds \$100,000 annually.</li> </ol> </li> </ol> <p>Omission of filing this exhibit, or filing this exhibit marked NONE is not acceptable.</p>
P	Actuarial Opinion Summary	<p>Actuarial Opinion Summary (AOS) are due by March 15. The AOS will be maintained as confidential by the Department under 40 P.S. § 443. The AOS should be sent separately from the Statement of Actuarial Opinion and clearly marked "Confidential".</p> <p>The AOS must be prepared as prescribed by the <i>Instructions</i> including but not limited to:</p> <ul style="list-style-type: none"> <li>the actuary's range of reasonable estimates and/or point estimates for loss and loss adjustment expense reserves,</li> </ul>



			<p>Harrisburg, PA 17120 Phone: 717.787-2735</p> <p>There is a filing fee of \$300 for restating or amending the Articles of Incorporation, no filing fee for changes to the bylaws. Note that amendments to the Articles of Incorporation require the prior approval of the Insurance Department (i.e. Name Change, recapitalization, etc.). Amended bylaws of some domestic Insurers require prior approval of the Insurance Department pursuant to 40 P.S. § 991.2422(b) and 40 Pa. C.S.A. § 6328.</p> <p><b>Foreign/Alien Insurers</b> are required to file restated or amended Articles of Incorporation. Foreign/Alien Insurers should not file amended bylaws.</p>
	Y	Notification of Address Changes	<p>Changes the Statutory Home Office or Mailing Address, require submission of the applicable NAIC UCAA Form (2c or 14) <a href="https://www.naic.org/industry_ucaa.htm">https://www.naic.org/industry_ucaa.htm</a> and filed electronically through the UCAA system.</p>
	Z	Corporate Governance Annual Disclosure (CGAD)	<p>The first PA CGAD filing due date is June 1, 2020. There is no separate regulation in PA. See 40 Pa. CS § 3901 et al. <a href="https://www.insurance.pa.gov/Companies/FilingRequire/Documents/CGAD%20posted%20to%20website.pdf">https://www.insurance.pa.gov/Companies/FilingRequire/Documents/CGAD%20posted%20to%20website.pdf</a></p>
	AA	Certificates of Compliance and Deposit	<p>Domestic insurers may request Certificates of Compliance. Domestic insurers with securities on deposit with the Commonwealth of Pennsylvania may request Certificates of Deposit. The cost is \$20 per certificate. The Department requires payment in advance in the form of a check payable to the “Commonwealth of Pennsylvania.” The Department will not invoice for the certificates. A cover letter should accompany the payment and include the following details:</p> <ul style="list-style-type: none"> <li>• Company name</li> <li>• NAIC number</li> <li>• Certificate type(s) requested</li> <li>• Number of certificates requested</li> <li>• Date that you would like the certificates prepared “as of” (note: the date of receipt of the request will be used by the Department unless another date acceptable to the Department is requested by the company)</li> <li>• Mailing address for the certificates</li> </ul> <p><b>Requests should be sent to:</b> Company Licensing Division Pennsylvania Insurance Department 1345 Strawberry Square Harrisburg, PA 17120 Or call Company Licensing Division at 717.787.2735</p>
	BB	Certification of Broker Controlled Insurers	<p>Pennsylvania domestic property and casualty insurers are required to comply with Article XIII of Insurance Company Law (40 P.S. §§ 991.1301-1305) pertaining to broker-controlled property and casualty insurers. A printable form is available under Companies (a drop down near top right), Filing Requirements, Property &amp; Casualty, then clicking Broker Controlled P&amp;C Insurers. Note this filing and the actuarial opinion are due on or before April 1.</p>

## **General Instructions For Companies to Use Checklist**

Pennsylvania's instructions for companies to file with the NAIC are included in this Checklist.

Electronic Filing is intended to be filing(s) submitted to the NAIC via the NAIC Internet Filing Site. Companies are not required to file these same documents separately with PA, nor are hard copy filings required.

### **Column (1) Checklist**

Companies may use the checklist to submit to a state, if the state requests it. Companies should copy the checklist and place an "x" in this column when submitting information to the state.

### **Column (2) Line #**

Line # refers to a standard filing number used for easy reference. This line number may change from year to year.

### **Column (3) Required Filings**

Name of item or form to be filed.

The *Annual Statement Electronic Filing* includes the annual statement data and all supplements due March 1, per the *Annual Statement Instructions*. This includes all detail investment schedules and other supplements for which the *Annual Statement Instructions* exempt printed detail.

The *March.PDF Filing* is the .pdf file for the annual statement, detail for investment schedules and all supplements due March 1.

The *Supplemental Electronic Filing* includes all supplements due April 1, per the *Annual Statement Instructions*.

The *Supplemental.PDF Filing* is the .pdf file for all supplements due April 1.

The *Quarterly Electronic Filing* includes the quarterly statement data.

The *Quarterly.PDF Filing* is the .pdf for quarterly statement data.

The *June.PDF Filing* is the .pdf file for the Audited Financial Statements and Accountants Letter of Qualifications.

### **Column (4) Number of Copies**

Please note the Department requests electronic filings. In the alternative, two hardcopies can be accepted.

### **Column (5) Due Date**

Indicates the date on which the company must file the form.

### **Column (6) Form Source**

This column contains one of three words: "NAIC," "State," or "Company" indicating the source of the filing Form. In the case of "Company", the filer is to develop the form based upon the current state requirements and/or NAIC *Annual Statement Instructions*.

### **Column (7) Applicable Notes**

This column contains references to the Notes to the Instructions that apply to each item listed on the checklist. The company should carefully read these notes before submitting a filing.