**New Items or Updates to 2017 Filing Requirements**

ORSA’s. Each company/group is required to determine whether or not they are subject to the ORSA requirements. If you are subject to the ORSA requirements, PA is considered to be the lead regulator of the group (or PA is the domestic regulator of a single company subject to ORSA), and pursuant to 40 P.S. § 991.2605(a), you must notify the Department of the expected filing date annually by 6/1. **Department policy is that the ORSA is to be filed no later than 10/1.**

Legal Entity Grid. If you are required to file the Form B, Holding Company Registration Statement, and PA is considered to be the lead regulator of the group, the Department expects to receive the Legal Entity Grid by 7/1. The Legal Entity Grid should contain complete and up to date information for every legal entity in the group as a separate line on the grid. Subsequent to the initial submission of the [Legal Entity Grid](https://www.insurance.pa.gov/Companies/FilingRequire/Documents/Legal%20Entity%20GRID%202016.xlsx), the Grid should be updated annually by the due date.

Form D’s. Currently, there is no filing fee for a Form D filing. Every Form D submitted should include the location of where each item required by 31 Pa. code, Chapter 25.21 is located in the agreement. If not applicable provide a detailed explanation. Beginning in 2017, each Form D filing should contain only one agreement. Please make sure all required information is included. Otherwise, the filing will be deemed incomplete.

Biographical Affidavits. The Department requires all pages of the [NAIC Biographical Affidavit](http://www.naic.org/documents/industry_ucaa_form11.doc) form to be completed for officers and directors. Partial filings will be considered incomplete.

Internal Audit Function Requirements. The Department amended Chapter 147 of the Department’s regulations ([31 Pa. Code, Chapter 147](http://www.pacode.com/secure/data/031/chapter147/chap147toc.html)) regarding Annual Financial Reporting Requirements. The amendments are effective January 17, 2017. Companies subject to the new requirements should be able to demonstrate compliance by December 31, 2017.

Financial Analysts. Each PA CCRC and domestic insurer has a dedicated analyst. Required filings with the Office of Corporate and Financial Regulation, Financial Analysis Division should be directed to the assigned financial analyst. If you aren’t sure the assigned analyst is, please direct inquiries to:

Email: [ra-in-analysis@pa.gov](mailto:ra-in-analysis@pa.gov) or Telephone: 717 787-3952

CCRC Disclosure Statements. A current and up to date copy of the resident agreement should be included with every disclosure statement filing. The disclosure statement filing should include all required items and be packaged in the same format as is presented to current or prospective residents upon request. The complete disclosure statement will be posted to the Department’s website. Partial filings will be considered incomplete.

Premium Tax Filings. Please do not send premium tax filings to the Pennsylvania Insurance Department. These filings should be submitted to the Pennsylvania Department of Revenue. Please see: <http://www.revenue.pa.gov>.

Certified Articles of Incorporation. The Department is not able to certify articles of incorporation. Please contact the Department of State for this service. Requesters can get certified copies three ways:

Online at <https://www.corporations.pa.gov/> (just create an account, search the entity and copies can be ordered from there using a credit card).

Via mail or over the counter using this form:

<http://www.dos.pa.gov/BusinessCharities/Business/RegistrationForms/Documents/RegForms/15-133_145_153%20Copy_Certification%20request.pdf>

Via phone: 717.787.1057