

State of Washington

Office of Insurance Commissioner (OIC)

2009 Electronic Submission Directive

All OIC FTP filings must comply with the NAIC instructions for electronic filing submissions and this OIC Directive. Terms in a bold blue italic font are defined by the NAIC.

New for 2009

- The OIC has an alternate process to the paper signature page requirements. See the next section.
- **Domestic life** insurers must now **electronically file** the Regulatory Asset Adequacy Issues Summary with the OIC. This is a confidential document, so do not include it in the same PDF file as the Statement of Actuarial Opinion. To ensure that this confidential document remains so, please follow the file naming convention to prevent its posting to the Internet with public documents.
- The NAIC has new documents that use the same **Filing BLOB Type Codes** as those for OIC-only documents. The new BLOB codes are PQ, PT, PU and PZ. The OIC FTP processing system will distinguish these overlapping BLOB codes by the **State Supplement Code**. Please ensure these documents have the correct codes.

Signatures

For financial statement filings due in 2009, including the December 31, 2008 Annual Statement, the OIC will consider use of the process outlined below as in compliance with Washington Administrative Code (WAC) 284-07-050(4)(b)(ii), 284-07-060(2)(c)(ii) and 284-07-100(6)(b).

Process Requirements

- The reporting entity must add a scanned image of an original, handwritten signature into the PDF reporting file.
- Each person must personally sign the document by hand. Reproduction or facsimile signatures are invalid, except for CPA firms.
- The handwritten signature must be on the actual page, in the signature area; it cannot be on a different page or a blank page.
- The signature page must be added into the same PDF file as the document that is being signed.

Have the officers, notary, actuary or CPA complete and sign the paper signature page. Then scan the page and insert it into the PDF file (this will require a program that can edit PDF files). The filing must still include the complete, searchable document that your annual statement preparation software or outside consultant generates (e.g., not a scanned image of a paper document).

CPA Firms

When the independent auditor is a firm instead of an individual CPA, we will accept any reasonable approximation of the firm's signature (including reproductions and facsimiles) for the audited financial report, CPA qualifications letter and report on significant deficiencies in internal controls.

Other Scanned Pages

The OIC will waive its prohibition on scanned pages in PDF files for these hand-signed signature pages only. You must create (not scan) all other pages from the original document.

If the reporting entity fails to properly sign or include the signatures in its filing, then it must file paper signature pages.

The Supplemental Filing due April 1 does not require a Jurat page.

If using digital signatures, they must be from a Certificate Authority with a valid license under Chapter 19.34 RCW. You may view the list of licensees at <http://www.secstate.wa.gov/ea/>.

Washington-Specific Filing Codes

The following documents MUST NOT be filed with the NAIC. Because of this, the NAIC did not create file names for these documents. These PDF and TXT file naming conventions are for Washington only. The rest of the file name will follow the NAIC file naming conventions of the other documents in the filing.

Submission Group Type Code	State Supplement Code	Filing BLOB Type Code	Description
M	WA	PZ	Actuarial Opinion Summary PDF (domestic P&C only)
M	WA	PD	Form IC-13-HC/IC-14-HMO (Additional Data Statement Form) PDF (HCSCs, HMOs and MEWAs only)
M	WA	PU	RCW 48.43.045(2) report PDF (if a Supplemental Compensation Exhibit is not filed)
M	WA	PW	Regulatory Asset Adequacy Issues Summary (domestic life only) NEW
M	WA	PY	Schedule SIS PDF, if applicable (domestic only)
M	WA	PC	Supplemental Compensation Exhibit PDF
R	WA	PR	Risk-Based Capital Report PDF (domestic only)
A	WA	PT	Business written by Agency PDF (domestic title only)
J	WA	PQ	CPA qualifications letter PDF (domestic only)
J	WA	PE	CPA report on significant internal control deficiencies PDF, if issued (domestic only)
(matches the PDF files)	WA	EM	Response Back E-Mail Address List (.TXT file)

Examples:

00000_01_x_2008_o_m_01_0_wa_pc.pdf is the OIC-only *Supplemental Compensation Exhibit*

00000_01_x_2008_o_m_01_0_na_pc.pdf is the NAIC *Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV*.

All TXT and PDF files that the NAIC has assigned a **Filing BLOB Type Code** MUST use the **State Supplement Code** of "NA". Your annual statement preparation software should automatically name all uniform NAIC documents with the proper file names.

For FTP filings with the OIC, the filings may put TXT and PDF files with a **State Supplement Code** of both "NA" and "WA" into one ZIP file. The ZIP file may use either "NA" or "WA" as its **State Supplement Code**.

NAIC Re-filing requests: This is typically due to problems at the NAIC with reading the data text file (the S.TXT file). Typically, the PDF files are not affected or changed, so **do not make re-filings with the OIC**. If the data changes, file an amendment (but only if the OIC or NAIC, in writing, permits an amendment).

Confirmation of Receipt

When a reporting entity includes a valid "WA_EM" text file, the OIC FTP processing system will automatically generate an official e-mail positive response. This e-mail will list the PDF and TXT files accepted and/or rejected or will explain why a filing is rejected. Please refer to the separate "WA_EM" instructions on the OIC website. **Without this official e-mail, the reporting entity has no proof of OIC acceptance and therefore no valid defense for a failure to timely file enforcement action.** Reviewing the email response can help the reporting entity confirm that its filings are complete and accurate.

OIC 2009 Electronic Submission Directive

The system is unable to reply to filings that arrive corrupt. Therefore, if you do not receive a confirmation of receipt e-mail response and believe you should, check with your computer security personnel for possible firewall changes since your last accepted filing. The most common error is forgetting to change the transfer type to binary (when using the Microsoft Windows FTP program) before putting the ZIP file on the OIC FTP site. Also, check the accuracy of the e-mail address that you provide.

A Brief Summary of the NAIC Electronic Requirements

- Reporting entities are required to file viewable and printable images of financial statements and supplements in PDF files. For the OIC, this means entities **may not scan documents into PDF files, except for the signature pages discussed above**, because the images are not clearly readable.
- All TXT and PDF files must be submitted as component files within a ZIP file.
- Each ZIP filing must have a unique file name. This means that once it is accepted, the ZIP file name cannot be used again.
- Companies may not mix different **Submission Filing Type Codes** or **Submission Group Type Codes** into one ZIP file.
- After the OIC processing system **accepts** a TXT or PDF file, subsequent filings of the same document must have a **Submission Group Type Codes** of "A", which means "amended". The OIC processing system rejects ZIP files that contain an original PDF file that would become a duplicate.

Typical Errors

- Mis-naming ZIP files by applying the PDF naming convention to ZIP file names.
- Interchanging a zero and "O" in the **Submission Filing Type Code**.
- Using the outdated 2003 file naming conventions (the *66666o1m.z1* style).
- Attempting to file by e-mail.
- Presuming your "transfer complete" message means the OIC accepted the filing when it only means the filing left your computer.
- Failing to zip the TXT and PDF files into a ZIP file.

It is the reporting entity's responsibility to follow the Washington statutes, regulations, technical advisories, NAIC Quarterly and Annual Statement Filing Instructions and NAIC Accounting Practices and Procedures Manual.