

**STATE OF MICHIGAN  
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES**

**Bulletin 2020-17-INS**

In the matter of:

**Temporary Flexibility for  
Regulatory Filing Deadlines**

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**Issued and entered  
this 13<sup>th</sup> day of April 2020  
by Anita G. Fox  
Director**

On March 10, 2020, Governor Whitmer issued Executive Order 2020-04, which declared a state of emergency across the State of Michigan due to the COVID-19 pandemic. On March 23, 2020, Governor Whitmer issued Executive Order 2020-21, directing Michigan residents to remain at home or in their place of residence, with limited exceptions. Executive Order 2020-21 took effect on March 24, 2020 at 12:01 a.m. and continues through April 13, 2020 at 11:59 p.m. On April 9, 2020, Governor Whitmer issued Executive Order 2020-42, which rescinded Executive Order 2020-21, but reaffirmed and clarified the measures set forth in it and extended their duration through April 30, 2020, at 11:59 p.m.

The Department of Insurance and Financial Services (DIFS) issued Bulletin 2020-12-INS on March 30, 2020, to provide guidance to the insurance industry regarding the impact of Executive Order 2020-21. Entities or persons regulated by DIFS were, and are, directed to continue compliance with all applicable statutory deadlines and requirements unless a deadline or requirement is expressly waived or modified by the Director.

This Bulletin additionally provides those entities or persons may request that the Director allow a 30- or 60-day delay in submitting certain regulatory filings. Those regulatory filings are identified below by indicating the filing's current, unmodified due date<sup>1</sup> and whether a 30- or 60-day delay may be available to extend the due date for a particular filing upon request. Requests for a 30- or 60-day delay in submitting a regulatory filing should be made electronically to DIFS with an email to the entity or person's assigned analyst with a copy to the analyst's manager. DIFS reserves the right to reject any request for a 30- or 60-day delay in submitting a regulatory filing based on the particular circumstances and/or financial condition applicable to the requesting entity or person.

Unmodified Filing Deadlines with a Potential 30-Day Delay

- May 1, 2020 – Combined Annual Statement Filing (Property & Casualty)
- May 1, 2020 – Combined Insurance Expense Exhibit (Property & Casualty; United States Branch of Non-US Insurers, Michigan Port of Entry)
- June 1, 2020 – Accountant's Letter of Qualifications

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<sup>1</sup> Further information regarding the statutory and regulatory filing deadlines and requirements may be found online on DIFS' [webpage](#) containing the Financial Statement Instruction Booklets and Forms.

- July 1, 2020 – PBR Exemption filing due to DIFS (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- August 15, 2020 – PBR Exemption filing due to the National Association of Insurance Commissioners (NAIC) (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)

The following quarterly filings apply to Health Maintenance Organizations, which are all due May 15, 2020, unless modified by a 30-day delay upon request:

- Revenue and Expense Report, FIS 0317
- Inpatient Discharges and Benefit Payouts Report, FIS 0320
- Working Capital Calculation, FIS 0321

The NAIC 2020 quarterly electronic filings, which are all due May 15, 2020, unless modified by a 30-day delay upon request, are as follows:

- Quarterly Financial Statement, as of March 31, 2020
- Trusteed Surplus Statement, quarter ending March 31, 2020 (Property & Casualty; United States Branch of Non-US Insurers, Michigan Port of Entry; Life, Accident & Health/Fraternal)
- Supplement A to Schedule T (Medical Professional Liability Supplement), quarter ending March 31, 2020 (Property & Casualty; United States Branch of Non-US Insurers, Michigan Port of Entry)
- Medicare Part D Coverage Supplement, quarter ending March 31, 2020 (Property & Casualty; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry; Life, Accident & Health/Fraternal; Health Maintenance Organizations; Alternative Financing & Delivery Systems; Hospital, Medical, Dental, & Indemnity Corporations)
- Merger/history Quarterly Form, if applicable and only electronic txt file
- Reasonableness of Assumptions Certification Required by Actuarial Guideline XXXV, quarter ending March 31, 2020 (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXV, quarter ending March 31, 2020 (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method Required by Actuarial Guideline XXXVI, quarter ending March 31, 2020 (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Average Market Value), quarter ending March 31, 2020 (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- Reasonableness and Consistency of Assumptions Certification Required by Actuarial Guideline XXXVI (Updated Market Value), quarter ending March 31, 2020 (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- Director and Officer Insurance Coverage Supplement, quarter ending March 31, 2020 (Property & Casualty; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)

#### Unmodified Filing Deadlines with a Potential 60-Day Delay

- May 1, 2020 – Form B, Holding Company Registration Statement, and Related Form C
- May 1, 2020 – Form F, Enterprise Risk Report

- June 1, 2020 – Audited Financial Report
- June 1, 2020 – Corporate Governance Annual Disclosure
- August 1, 2020 – Communication of Internal Control Related Matters Noted in Audit
- Deadlines occurring within the duration of the Governor’s emergency declaration for an Own Risk and Solvency Assessment (ORSA) Summary Report.<sup>2</sup>

Unless modified by a 60-day delay upon request, the filing deadlines for components of the 2019 annual filings, which, if applicable and Michigan is the state of domicile, should be submitted only to DIFS, are as follows:

- April 30, 2020 – Actuarial Memorandum Required by Actuarial Guideline XXXVIII 8D (Life, Accident & Health/Fraternal; United States Branch of Non-US Insurers, Michigan & Non-Michigan Port of Entry)
- August 1, 2020 – Management’s Report of Internal Control Over Financial Reporting

Insurers are reminded that pursuant to Bulletin 2020-08-INS, entities and persons regulated by DIFS are still required to make all required electronic filings with the NAIC. Until the expiration of 30 days after the end of the Governor’s emergency declaration and any extensions thereof, all other filings may be made electronically to DIFS with an email to the entity or person’s assigned analyst with a copy to the analyst’s manager, unless notified otherwise by DIFS. Additionally, a list of all filings made electronically in lieu of hard-copy filings must be maintained and the hard copy filed upon being notified by DIFS. This Bulletin clarifies that during the time period in which DIFS is accepting electronic filings in lieu of hard-copy filings, DIFS is accepting required filings that contain electronic signatures.

Any questions regarding this Bulletin should be directed to:

Department of Insurance and Financial Services  
Office of Insurance Evaluation  
530 W. Allegan Street – 7<sup>th</sup> Floor  
P.O. Box 30220  
Lansing, Michigan 48909-7720  
Toll-Free: (877) 999-6442

/s/

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Anita G. Fox  
Director

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<sup>2</sup> Pursuant to MCL 500.1707, the annual due date for an ORSA Summary Report is determined by the calendar date previously submitted to DIFS. Accordingly, the potential applicability of a 60-day delay for the due date of a regulated entity’s or person’s ORSA Summary Report will generally depend on that entity’s or person’s previously established annual due date.