



## DEPARTMENT OF COMMERCE AND INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

IN REGARD TO THE NATIONAL )  
ASSOCIATION OF INSURANCE )  
COMMISSIONERS' VALUATION ) Case No. 2512091368F  
MANUAL )

### **ORDER APPROVING ANNUAL AMENDMENTS TO THE NAIC VALUATION MANUAL**

Based on competent and substantial evidence in the administrative record before me, I, Angela L. Nelson, Director of the Missouri Department of Commerce and Insurance, determine that there is no need for additional proceedings or a formal hearing on this matter and hereby issue the following Findings of Fact, Conclusions of Law, and Order:

#### **FINDINGS OF FACT**

1. On August 13, 2025, the Executive ("EX") Committee and Plenary of the National Association of Insurance Commissioners ("NAIC") met in Minneapolis, Minnesota.

2. During the August 13, 2025, meeting, the EX Committee and Plenary voted to adopt the amendments to the NAIC *Valuation Manual*. A copy of Attachment Two Executive (EX) Committee and Plenary amendments, which is a summary of the amendments adopted, is attached hereto and, by this reference, incorporated herein.

3. The EX Committee and Plenary adopted the amendments to the 2026 *Valuation Manual* a by a vote of 49 of the 56 member jurisdictions, which represented 94.67% of the applicable premiums written.

4. The vote satisfied the NAIC's requirements for amending the *Valuation Manual*.

### **CONCLUSIONS OF LAW**

5. Section 376.380.6(3), RSMo 2016 provides as follows:

(3) Unless a change in the valuation manual specifies a later effective date, changes to the valuation manual shall be effective on January first following the date when all of the following have occurred:

(a) The change to the valuation manual has been adopted by the NAIC by an affirmative vote representing:

a. At least three-fourths of the members of the NAIC voting, but not less than a majority of the total membership; and

b. Members of the NAIC representing jurisdictions totaling greater than seventy-five percent of the direct premiums written as reported in the following annual statements most recently available prior to the vote in subparagraph a. of this paragraph: life, accident, and health annual statements; health annual statements; or fraternal annual statements;

(b) The valuation manual becomes effective under an order of the director.

6. Based on the Findings of Fact set out above, the amendments approved by the NAIC EX Committee and Plenary meet the requirements specified in § 376.380.6(3), RSMo 2016.

## ORDER

IT IS THEREFORE ORDERED that the amendments to the *Valuation Manual* adopted by the NAIC EX Committee and Plenary on August 13, 2025, shall become effective pursuant to § 376.380.6(3)(b), RSMo 2016, with an effective date of January 1, 2026.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri this 23rd day of December 2025.



Angela L. Nelson  
Angela L. Nelson  
Director  
Missouri Department of Commerce and  
Insurance

LATF VM Amendment	Valuation Manual Reference	Valuation Manual Amendment Proposal Descriptions	LATF Adoption Date	Page Number
2024-11	Valuation Manual Section II, Subsection 1.G	This amendment is to coordinate with Blanks updates that have been made. Specifically, in Exhibit 1, Part 1 there is now an “individual” column rather than an “ordinary” column and the separate industrial and credit life columns were removed, by BWG 2022-14.	9/5/2024	4
2024-14	VM-31 Section 3.F.3.f	This amendment adds VM-31 Section 3.F.3.f(iii) to require reporting on waiver of surrender charges provisions.	11/15/2024	6
2024-13	VM- 20 Section 7.D.7 VM-30 Section 3.B.5	This amendment clarifies the reflection of negative interest maintenance reserves (IMRs).	12/12/2024	7
2024-15	VM-21 Section 11.B.3 (Mortality)	This amendment corrects an error introduced in amendment 2024-07 that unintentionally changed the industry mortality table from a ceiling to a floor for variable annuity guaranteed living benefits (VAGLBs).	12/12/2024	9
2025-01	VM-20, Sections 3.C.1.g and 6.B.5.d	This amendment ensures that groups with higher anticipated mortality reflect appropriate margins in the mortality rates used for the basic reserve/NPR calculation.	3/22/2025	11
2025-03	VM-20, Section 9.D.5	This amendment modifies the universal life with secondary guarantee (ULSG) lapse assumption for policies with minimal cash surrender value (CSV) so that the required industry table is a guardrail rather than a prescribed assumption.	3/22/2025	14
2025-02	VM-02 Section 3.A. (Nonforfeiture Rates); VM-20 Section 3.C.2.a. and 3.C.2.b.	This amendment clarifies the rounding rules associated with the calculation of rates from the NAIC model Standard Valuation Law and model Standard Nonforfeiture Law for Life Insurance.	4/24/2025	16
2024-16	VM-02, Section 3, Guidance Note	The addition to the guidance note in this amendment adds clarity to the nonforfeiture requirements for UL policies where the CSV is based on multiple sets of accounts with different guaranteed interest rates.	5/8/2025	18
2025-07	VM-21, Section 6 VM-31, Section 3.12	As of January 1, 2025, the company-specific market path method (CSMP) is no longer an option for calculating the Additional Standard Projection Amount (ASPA) under VM-21. This amendment removes references to the CSMP.	5/8/2025	19
2025-08	VM 30, Section 3.A.4	This amendment revises the Identification Section of the Life Actuarial Opinion to handle appointed actuaries who are employed by one company within an insurance group, and who sign opinions on behalf of other companies within the group.	6/5/2025	30
2025-09	VM-20, Section 8.C.3.c	This amendment clarifies requirements to ensure that expense risk in reinsurance is adequately reserved for.	6/5/2025	31
2025-10	VM-20 Section 7.E.1.g and VM-21 Section 4. D.4.b	This amendment revises the reinvestment guardrail to have a minimum quality rather than a prescribed quality.	6/5/2025	32
2025-04	VM-20 Section 6, VM-20 Section 7, VM-20 Appendix 1, VM-21 Section 8, VM-31 Section 3	This amendment updates the Valuation Manual economic scenario generator references for the adoption of the Conning-maintained prescribed economic scenario generator.	6/12/2025	33
2025-06	VM-01 definitions of Qualified Actuary and Appointed Actuary	This amendment updates the definitions of Qualified Actuary and Appointed Actuary to add reference to the knowledge statements adopted by LATF.	6/12/2025	58
2025-11	Valuation Manual, Section II Subsections 2, 3, 6, VM-01, VM-22, VM-31, VM-G, and VM-V	This amendment introduces a new principle-based reserving framework for non-variable annuities, located in Section VM-22 of the NAIC Valuation Manual.	6/18/2025	60