

NOTICE

DATE: December 17, 2025

TO: All DC Captives and Captive Managers

FROM: Sean O'Donnell
 Associate Commissioner,
 Risk Finance Bureau (“RFB”)

SUBJECT: 2025 Reporting Instructions, RFB

TABLE OF CONTENTS

New for 2025	2
Important Reminders for 2025	2
Un-audited Financial Statements	3
GAAP Reporting in Yellow Blank	4
Annual Statement NOTE 1	5
Reporting of Prior Year Amounts for Non-RRGs and RRGs	5
Audited Financial Report	5
Statement of Actuarial Opinion	7
Actuarial Opinion Summary	8
Special Instructions for Cell Reporting	8
Special Instructions for Branch Captive Reporting	9
General Filing Instructions Applicable to All Filings	10
Fiscal Year Filers	10
Premium Tax Returns	10
Certificate of Authority Renewal	11
Business Plan Changes	12
Appendix A – Filing Instructions	Appendix A
Appendix B – Filing Checklist	Appendix B

NEW FOR 2025

2025 DC Reporting Blank for non-RRG captives:

Questions #15 and 25 on page 4 of the DC Reporting Blank have been updated.

MANDATORY USE OF NAIC OPTins (On-line Premium Tax system):

- **Mandatory Use of OPTins by DC Captives and domestic Risk Retention Groups for Premium Tax and COA Renewal Filings and Payments. See pages 10 and 11 for more information.**

IMPORTANT REMINDERS FOR 2025

1. **REMINDER:** Page 8 - Clarification for 2025 that combined audits for cell reporting must also include the combined income statement.
2. **REMINDER:** The instructions on page 7 for the annual audited financial report for RRGs clarify that the “Communication of internal control related matters noted during the audit” is required under § 31-309(a) of the DC Code regardless of whether there are any unremediated material weaknesses noted during the audit.
3. **REMINDER:** For RRGs, for purposes of completing Note 31, “High Deductibles”, in the 2025 NAIC annual statement blank, DC’s definition of a high deductible policy is a policy with a deductible of \$25,000 or greater. Note 31 must be completed by RRGs having at least one policy with a deductible of \$25,000 or more.
4. **REMINDER:** **HARD-COPY FILINGS ARE NOT REQUIRED; all filings are electronic-only.** All electronic annual and quarterly financial filings must clearly reflect executed signatures. Electronic signatures such as DocuSign and Adobe are acceptable.
5. **REMINDER:** For RRGs, the NAIC “2025 Property/Casualty Annual Statement Instructions” include guidance requiring the Appointed Actuary to provide documentation of how the Appointed Actuary meets the definition of “Qualified Actuary”. RRGs should ensure the Appointed Actuary follows this guidance.
6. **REMINDER:** For RRGs, the “Statement of Actuarial Opinion” is due March 2 with the Annual Statement filing. The “Actuarial Opinion Summary” is due March 15.

7. **REMINDER:** The NAIC Property/Casualty statement blank (the “yellow blank”) changes every year and RRGs are required to file the current version.
8. **REMINDER:** All requests for approval to make business plan changes must be sent to Sean O’Donnell (sean.odonnell@dc.gov), Associate Commissioner, Risk Finance Bureau; Surayuth “Jop” Bunyasrie (surayuth.bunyasrie@dc.gov), Director of Financial Analysis , Risk Finance Bureau; and **to the applicable financial analyst**. See page 12 for further information regarding business plan changes and contact information for the financial analysts.

UN-AUDITED FINANCIAL STATEMENTS

Section 31-3931.13 of the DC Official Code requires, on or before March 2nd of each year, captive insurers, including RRGs, to submit to the Commissioner, on a form prescribed by the Commissioner, an un-audited report of financial condition. A captive insurer shall use GAAP and include any useful or necessary modifications or adaptation thereof that have been approved or accepted by the Commissioner for the type of insurance and kinds of insurers to be reported upon, as supplemented by additional information required by the Commissioner. A captive insurer must notify the RFB in writing before March 2 if its unaudited financial statements will not be filed by the deadline. The captive insurer shall specify if an extension or waiver is being requested. Requests for extensions and waivers must be updated annually in writing (and quarterly for RRGs).

Non-risk retention groups (“non-RRGs”) should use the “District of Columbia Captive Insurance Company Annual Statement for the period ended December 31, 2025” (“DC Blank”) for the annual un-audited filing. As prescribed and approved by the Commissioner, the DC Blank can be found on the DISB website at <https://disb.dc.gov/captiveins>

Please note the following regarding completion of the 2025 DC Blank:

- Page 2 line 1 (Bonds) pulls from page 9 (page 9 needs to be completed to populate this line on page 2)
- Page 2 line 3 (Cash & Cash Equivalents) pulls from page 9 (page 9 needs to be completed to populate this line on page 2)
- Page 2 line 4 (Short-Term Investments/Certificate of Deposit) pulls from page 9 (page 9 needs to be completed to populate this line on page 2)
- Page 2 lines 12 and 13 pull from (Reins. Recoverable on Unpaid and Paid Losses & LAE) page 6
- Page 2 lines 20 and 21 (Losses and Loss Adjustment Expenses) pull from page 7 (page 7 needs to be completed to populate these lines on page 2)
- Page 2 lines 35.a) and 35.b) (Common Stock and Preferred Stock) pull from Question 1.2 on page 4a (page 4a Question 1.2 needs to be completed to populate these lines on page 2)

- Page 3 lines 6 and 7 (Net Losses Incurred and Net Loss Adjustment Expenses Incurred) pull from page 8 (page 8 needs to be completed to populate these lines on page 3)

Upon completion of the DC Blank and prior to filing, please review tab 10 (“Cross Check”) for any errors and correct any errors prior to filing.

Alternatively, in lieu of filing the “DC Blank”, non-RRGs may elect to use the NAIC Property & Casualty Annual Statement Blank (“yellow blank”) and Instructions. Non-RRGs choosing to use the yellow blank should contact the Department for further information.

All domestic RRGs are required to file GAAP based annual and quarterly unaudited statements with the Department using the NAIC yellow blank and Instructions. (SAP reporting may also be permitted in the yellow blank. Please contact the Department regarding SAP reporting.)

GAAP REPORTING IN YELLOW BLANK

The yellow blank is set up for SAP reporting. For RRGs that file GAAP, certain GAAP assets and liabilities shall be reflected separately on the respective lines of the yellow blank as indicated below. Note that DC RRGs are required to report prepaid reinsurance (i.e., ceded unearned premiums), and reinsurance recoverable on unpaid losses and LAE as deductions from liabilities. This is inconsistent with GAAP, which requires these amounts to be classified as assets. However, reporting them as deductions from the related liabilities will be consistent with the NAIC yellow blank and facilitate more meaningful analysis of ratios and risk-based capital by the Department.

GAAP Classification	Yellow Blank
Deferred Acquisition Costs	Page 2 – Line 25 – “Aggregate write-ins for other than invested assets” as a separate line item.
Prepaid Expenses	Page 2 – Line 25 – “Aggregate writes-in for other than invested assets” as a separate line item.
Prepaid Reinsurance (i.e., ceded unearned premiums)	Page 3, Line 9 – parenthetical DEDUCTION from gross unearned premiums.
Reinsurance recoverable on <u>unpaid</u> losses and loss adjustment expenses	Page 3 – Lines 1 and 3 – DEDUCTION from gross Losses and Loss adjustment expenses.

In addition, the following items should be reported in the yellow blank as follows:

Financial Statement Item	Yellow Blank
Reinsurance recoverable on <u>paid</u> losses and loss adjustment expenses	Page 2 – Line 16.1 – “Amounts recoverable from reinsurers”.

DISB approved Letters of Credit (LOC) reported as an asset	Page 2 – Line 25 – “Aggregate writings for other than invested assets” as a separate line item.
DISB approved Surplus Notes	Page 3 – Line 33 – “Surplus Notes”

ANNUAL STATEMENT NOTE 1
Summary of Significant Accounting Policies (including GAAP to SAP Reconciliation) and Going Concern:

This note (including a table reconciling income and surplus between the state basis and SAP basis) is required to be completed, even if there are no prescribed practices or permitted practices to report. **RRGs should refer to the specific instructions for Note 1 contained in the “Official NAIC Annual Statement Instructions Property/Casualty for the 2025 reporting year”.** It is the responsibility of the RRG to properly complete the Note 1 in accordance with the NAIC Instructions, including the Going Concern disclosures. RRGs should also report any differences related to ASC 321- Investments in Equity Securities.

REPORTING OF PRIOR YEAR AMOUNTS FOR NON-RRGS AND RRGs

PLEASE NOTE THAT PRIOR YEAR 2024 NUMBERS INCLUDED IN THE COMPARATIVE COLUMNS IN THE 2025 UNAUDITED STATEMENTS (DC BLANK AND NAIC BLANK) **SHOULD NOT BE CHANGED** IN THE 2025 UNAUDITED FILINGS. THE PRIOR YEAR NUMBERS SHOULD AGREE TO THE PREVIOUSLY FILED STATEMENTS. ALSO, FOR 2026 QUARTERLY RRG STATEMENTS, PRIOR YEAR 2024 NUMBERS INCLUDED IN THE COMPARATIVE COLUMNS IN THE 2026 NAIC QUARTERLY BLANKS **SHOULD NOT BE CHANGED**.

IF, DURING 2026, AS A RESULT OF AUDIT ADJUSTMENTS IN THE 2025 AUDITED FINANCIAL STATEMENTS OR FOR OTHER REASONS, COMPANIES DISCOVER ERRORS OR ADJUSTMENTS TO THE 2025 UNAUDITED NUMBERS, SUCH ERRORS OR ADJUSTMENTS SHOULD BE CORRECTED THROUGH OPERATIONS OR SURPLUS IN THE 2026 ANNUAL AND QUARTERLY STATEMENTS.

THE ONLY TIME PRIOR YEAR COMPARATIVE COLUMNS MAY BE CHANGED IS IF THE PRIOR YEAR STATEMENT IS RE-FILED WITH THE RFB (AND FOR RRGs, ALSO WITH THE NAIC). PRIOR YEAR STATEMENTS MAY BE RE-FILED UP TO 13 MONTHS AFTER THE DECEMBER 31 YEAR END DATE. COMPANIES SHOULD CONTACT THE RFB IN ADVANCE TO DISCUSS ANY PROPOSED RE-FILINGS.

AUDITED FINANCIAL REPORT

Pursuant to DC Municipal Regulations (“DCMR”), Title 26, Section 3702, all **non-RRG** captive insurance companies shall have an annual audit by an independent certified public accountant authorized by the Commissioner and shall file such audited financial report with the Commissioner on or before June 30 for the year ending December 31 immediately preceding. This includes Protected Cell Captive Insurers,

Incorporated Cells, and Protected Cells. Please refer to the “Special Instructions for Cell Reporting” section below for additional guidance regarding audited financial statement requirements for Protected Cell Captive Insurers, Incorporated Cells, and Protected Cells.

For non-RRGs, the annual audit shall consist of the following:

- a) Financial statements furnished pursuant to this section shall be examined by independent certified public accountants in accordance with generally accepted auditing standards as determined by the American Institute of Certified Public Accountants.
- b) The opinion of the independent certified public accountant shall cover all years presented.
- c) The opinion shall be addressed to the captive insurance company on stationery of the accountant showing the address of issuance, independent certified public accountant signatures, and shall be dated.

The annual audit report shall include an evaluation of the internal controls of the captive insurance company relating to the methods and procedures used in the securing of assets and the reliability of the financial records, including but not limited to such controls as the system of authorization and approval and the separation of duties. The annual audit shall be conducted in accordance with generally accepted auditing standards.

The accountant shall furnish the company, for inclusion in the filing of the audited annual report, a letter stating:

- a) That it is independent with respect to the captive insurance company and conforms to the standards of the profession, as contained in the Code of Professional Ethics and pronouncements of the American Institute of Certified Public Accountants and pronouncements of the Financial Accounting Standards Board.
- b) The general background and experience of the staff engaged in audit including the experience in auditing captives or other insurance companies.
- c) That the accountant understands that the audited annual report and his opinions thereon will be filed in compliance with this regulation with the Department of Insurance, Securities and Banking.
- d) That the accountant consents to the requirements of DCMR, Title 26, Section 3705 (“AVAILABILITY AND MAINTENANCE OF WORKING PAPERS OF THE INDEPENDENT CERTIFIED PUBLIC ACCOUNTANT”).
- e) That the accountant is properly licensed by an appropriate District or state licensing authority and is a member in good standing in the American Institute of Certified Public Accountants.

The annual audit shall include the following financial statements:

- a) Balance sheet;
- b) Statement of operations;
- c) Statement of changes in financial position;
- d) Statement of changes in capital paid up, gross paid in and contributed surplus and unassigned funds (surplus); and
- e) Notes to financial statements, which shall include those that are required by generally accepted accounting principles, including:
 1. A reconciliation of differences in policyholders’ surplus, assets, liabilities, and net income, if any, between the audited financial report and the statement or form filed with the Commissioner (i.e., un-audited statement);
 2. A summary of ownership and relationship of the company and all affiliated corporations or companies insured by the captive; and
 3. A narrative explanation of all material transactions and balances with the company.

RRGs shall file the annual audited financial report, in compliance with the “Annual Audited Financial Reports Act” (D.C. Official Code § 31-301 et seq.), with the Commissioner and with the NAIC by June 1. In addition to the audit report, required filings include the “Accountants Letter of Qualifications” (due June 1), and “Communication of internal control related matters noted during the audit” (due within 60 days after the filing of the annual audited financial report). The “Communication of internal control related matters noted during the audit” is required under § 31-309(a) of the DC Code regardless of whether there are any unremediated material weaknesses noted during the audit.

RRGs requesting waivers from the filing of the audited financial report shall request such waiver under D.C. Official Code § 31-312(a) and shall cite to this section of the D.C. Official Code in the request for waiver.

A captive insurer must notify the RFB in writing before June 1 (for RRGs) or June 30 (for non-RRGs) if its audited financial statements will not be filed by the deadline. The captive insurer shall specify if an extension or waiver is being requested. Requests for extensions and waivers must be updated annually in writing.

STATEMENT OF ACTUARIAL OPINION

For RRGs, the required opinion must follow The Property and Casualty Actuarial Opinion Amendment Act of 2008 (D.C. Official Code §§ 31-2502.26a and 31-2502.26b), and with the NAIC Annual Statement Instructions. RRGs requesting waivers from the filing of the actuarial opinion shall request such waiver under D.C. Official Code § 31-2502.26a(a) and shall cite to this section of the D.C. Official Code in the request for waiver.

For non-RRGs, the required opinion may follow the NAIC Annual Statement Instructions but is not required to do so. For non-RRG opinions that do not follow the NAIC Annual Statement Instructions, the actuary must still state his or her “opinion” regarding the sufficiency of the company’s loss reserves and loss expense reserves, and the actuary must sign such opinion.

The individual who certifies as to the adequacy of reserves shall be approved by the Commissioner and shall be a Fellow of the Casualty Actuarial Society, a member in good standing of the American Academy of Actuaries, or an individual who has demonstrated competence in loss reserve evaluation to the Commissioner. For RRGs, the NAIC “2025 Property/Casualty Annual Statement Instructions” includes guidance requiring the Appointed Actuary to provide documentation of how the Appointed Actuary meets the definition of “Qualified Actuary”. RRGs should ensure the Appointed Actuary follows this guidance.

An insurer must notify the RFB in writing before the applicable deadline if its actuarial opinion will not be filed by the deadline. The captive insurer shall indicate if an extension or waiver is being requested. Requests for extensions and waivers must be updated annually in writing.

ACTUARIAL OPINION SUMMARY

For RRGs, the required Actuarial Opinion Summary must follow The Property and Casualty Actuarial Opinion Amendment Act of 2008 (D.C. Official Code §§ 31-2502.26a and 31-2502.26b), and with the NAIC Annual Statement Instructions.

The Actuarial Opinion Summary is not required for non-RRGs.

SPECIAL INSTRUCTIONS FOR CELL REPORTING

Each Protected Cell Captive Insurer (“PCC”), and each Incorporated Cell (“IC”) and Protected Cell (“PC”) affiliated with the PCC shall file separate un-audited financial statements on the DC Blank on or before March 2nd of each year.

Below are instructions for filing audited financial statements and actuarial opinions for cell companies. Due to variations in cell structures and business plans, audited financial statements and actuarial opinions, particularly of the PCC (“core”), may not be necessary in some circumstances. Any questions regarding cell reporting should be discussed with the Department. Permission to deviate from these instructions must be discussed and received from the Department in advance of filing deadlines.

Each PCC, IC and PC may file separate audited financial statements with the Department on or before June 30th of each year. In lieu of separate audited financial statements, each PCC may file “combined”⁽¹⁾ audited financial statements with the Department on or before June 30th of each year. The auditor shall express an opinion on the combined assets, liabilities, capital and surplus, and income statement of the PCC and all PCs and ICs. The detailed assets (e.g., Bonds, Prepaid Reinsurance Premiums, etc.), liabilities (e.g., Losses, Unearned Premiums, etc.) and capital and surplus (e.g., Common Stock, etc.), and income statement balances of the PCC and each IC and PC shall be disclosed in a Note to the financial statements. The combined totals of each of these balances should equal the totals of the respective balances in the consolidated or combined audited financial statements and the individual balances and totals for the PCC and each IC and PC should agree to the totals in the separate un-audited financial statements filed for the PCC and each IC and PC.

(1) For purposes of this section, “combined” refers to combined statements/opinion of the PCC and PCs and ICs. “Combined” does not refer to “consolidation” as contemplated by “consolidated” GAAP reporting. In

circumstances where the PCC and cells are under common ownership, a GAAP consolidated audit may be possible.

Each PCC, IC and PC may file separate statements of actuarial opinion with the Department on or before June 30th of each year. In lieu of separate actuarial opinions, each PCC may file a combined⁽¹⁾ actuarial opinion certifying the adequacy of the loss reserves and loss expense reserves on or before June 30th of each year. The opinion shall be in accordance with the above instructions for actuarial opinions for non-RRGs. The actuary shall opine on the loss reserves and loss expense reserves in each IC and PC, and the PCC (if applicable⁽²⁾). In addition, the opinion shall include a Note showing the loss reserves and loss expense reserves for each IC and PC, and PCC (if applicable). The sum of loss and loss expense reserves in the Note should equal the loss and loss expense reserve balances reported in the combined actuarial opinion. In addition, the individual amounts in the Note for each IC and PC, and PCC (if applicable) should agree to the amounts in the separate un-audited financial statements filed for the PCC and each IC and PC.

- (1) For purposes of this section, “combined” refers to combined statements/opinion of the PCC and PCs and ICs. “Combined” does not refer to “consolidation” as contemplated by “consolidated” GAAP reporting.
- (2) For a PCC that has never written any insurance or reinsurance business, an actuarial opinion is not required and a request for a waiver is not required.

SPECIAL INSTRUCTIONS FOR BRANCH CAPTIVE REPORTING

Each branch captive insurance company (“BCIC”) shall file with the Commissioner copies of all reports and financial statements (i.e., audited, or un-audited financial statements and actuarial opinions) required to be filed by the parent captive insurance company (“parent”) of the BCIC under the laws of the jurisdiction in which the parent is domiciled. The copies of the reports and financial statements shall be certified under oath by two officers of the parent.

In addition to the aforementioned filings, the parent shall file a statement signed by two of its executive officers, one of which must be the President or Chief Financial Officer, setting forth the gross premiums written, reinsurance ceded and assumed, and reserves and other liabilities associated with the insurance business written through the BCIC. This statement, or an accompanying statement, should also indicate the earned premiums, paid losses, and the changes in the loss reserves such that the underwriting profit or loss is shown for the BCIC. This information may be filed either within the letter or on a spreadsheet.

The BCIC is not required to file audited financial statements. However, the parent’s audited financial statements should include a Note disclosing the amounts attested to by the officers regarding the insurance business written through the BCIC.

For branch companies with a December 31 year end, all filings are due on or before June 30th of each year. For branch companies with a fiscal year end other than December 31, all filings are due on or before 6 months after the date of the BCIC’s fiscal year end. If the parent’s information is not available by the applicable deadline, the captive manager shall contact the Department in writing prior to the deadline to request an extension of the deadline to a date when the information is anticipated to be available.

GENERAL FILING INSTRUCTIONS APPLICABLE TO ALL FILINGS

All filings should be sent via email to captive.filings@dc.gov. All filings must reflect executed signatures. For RRGs required to file with the NAIC and for other companies voluntarily filing with the NAIC, please note that hard copies of annual statements, quarterly statements, and supplemental filings are not required to be filed with the NAIC. Requirements for electronic filings to the NAIC remain in place.

Non-RRGs shall file the DC Blank in **both PDF and Excel formats**. See the attached Appendix A “DC 2025 Filing Instructions for Captive Insurance Companies” and Appendix B “DC 2025 Annual/2026 Quarterly Filing Checklist for Captive Insurance Companies” for further filing requirements and instructions.

A captive insurer must notify the RFB in writing before the filing deadline if a filing will not be filed by the deadline. The captive insurer shall indicate if an extension or waiver is being requested. Requests for extensions and waivers must be updated annually in writing.

For questions or clarification on financial filings, please contact Jop Bunyasrie, Director of Financial Analysis at 202-442-7797, surayuth.bunyasrie@dc.gov or Sean O’Donnell, Associate Commissioner, 202-442-8153, sean.odonnell@dc.gov

FISCAL YEAR FILERS

Companies with a fiscal year-end other than December 31 may request and receive permission from the RFB to file on a basis other than December 31 (RRGs must report using a December 31 year end and may not file with a fiscal year-end other than December 31). This request need only be made one time, but any subsequent changes must also be approved by the RFB. Filing deadlines for non-RRG fiscal year filers are calculated based on the filing deadlines for calendar year filers. Unaudited statements are due 2 months and 2 days after the fiscal year end, and the audited financial statements and actuarial opinions are due on the last day of the sixth month after the fiscal year end. For example, for a company on a June 30 fiscal year end, the un-audited statements are due September 2, and the audited financial statements and actuarial opinions are due on December 31.

There is no change in the due dates for premium tax returns for fiscal year filers but see below under “Premium Tax Returns” for special instructions for fiscal year filers.

There is no change in the due date for certificate of authority renewals for fiscal year filers.

PREMIUM TAX RETURNS

All domestic captives are required to file a DC Premium Tax Return on or before March 2nd of each year. Filing Instructions and Tax Forms for captives can be accessed through the DISB website at <https://disb.dc.gov/captiveins>

Please note: Effective January 1, 2026, it will be mandatory to use the National Association of Insurance Commissioners (“NAIC”) OPTins system (Online Premium Tax for Insurance) for all premium tax return filings and payments.

****NOTE**** In accordance with the captive law of the District of Columbia, companies shall report as premiums and pay applicable premium tax on total net direct premiums. Total net direct premiums shall include all amounts charged to policyholders, including amounts that some companies may charge separately to policyholders such as amounts for premium taxes, risk management fees, etc. Total net direct premiums shall be reported on the premium tax return and should agree to Schedule T for companies filing the NAIC yellow blank and should agree to tab 5 (“Premium Schedule”) for companies filing the DC Blank.

Each PCC and each IC shall file separate premium tax returns. ICs are subject to the minimum tax (\$7,500). One or more PCs shall file a consolidated premium tax return with the PCC. Each PC is not subject to the minimum tax.

Fiscal year filers shall file a DC Premium Tax Return on or before March 2nd of each year, reporting premiums written for the most recently completed fiscal year.

See the attached Appendix A “**DC 2025 Filing Instructions for Captive Insurance Companies**” and Appendix B “**DC 2025 Annual/2026 Quarterly Filing Checklist for Captive Insurance Companies**” for further instructions regarding premium tax returns.

For questions or clarification on premium taxes, please email captive.filings@dc.gov and copy Sean O’Donnell at sean.odonnell@dc.gov

CERTIFICATE OF AUTHORITY RENEWAL

Pursuant to Section 31-3931.09(d) of the DC Official Code, all licensed captive insurance companies and risk retention groups shall renew Certificates of Authority annually, on or before April 30 of each year. Beginning with 2026-2027 renewals, it will be mandatory to use the National Association of Insurance Commissioners (“NAIC”) OPTins system (Online Premium Tax for Insurance) for all certificate of authority (COA) renewal filings and payments. As in prior years, COA renewal fees can be paid in conjunction with the annual premium tax filing and payment. To avoid the need for multiple OPTins transactions (there is a \$17.50 fee for each transaction), companies are encouraged to renew and pay the COA renewal fee in conjunction with the annual premium tax filing and payment. The annual renewal fee is **\$300**. Further information about COA renewals can be found at <https://disb.dc.gov/node/1790831>

The Commissioner may impose a fine or suspend or revoke the Certificate of Authority if it is not renewed by August 1.

See the attached Appendix A “**DC 2025 Filing Instructions for Captive Insurance Companies**” and Appendix B “**DC 2025 Annual/2026 Quarterly Filing Checklist for Captive Insurance Companies**” for further instructions regarding certificate of authority renewals.

For questions or clarification on certificates of authority, please email captive.filings@dc.gov

BUSINESS PLAN CHANGES

All requests for approval to make business plan changes must be sent to the following:

- **Sean O’Donnell (sean.odonnell@dc.gov), Associate Commissioner, Risk Finance Bureau**
- **Surayuth “Jop” Bunyasrie (surayuth.bunyasrie@dc.gov), Director of Financial Analysis, Risk Finance Bureau**
- **The applicable financial analyst**

Financial Analysts:

Christine Afolabi	christine.afolabi@dc.gov
Anu Andrew	anu.andrew@dc.gov
Becky Davis	rebecca.davis@dc.gov
LaTasha Davis	latasha.davis@dc.gov
Maurice Fuller	maurice.fuller@dc.gov
Jakub Poniatowski	jakub.poniatowski@dc.gov

Appendix A

DC 2025 Filing Instructions for Captive Insurance Companies

1. Financial Filings Questions:	Jop Bunyasrie, Director of Financial Analysis, Risk Finance Bureau, (202) 442-7797, Surayuth.bunyasrie@dc.gov or Sean O’Donnell, Associate Commissioner, Risk Finance Bureau (202) 442-8153, sean.odonnell@dc.gov
2. Financial Filings:	<p>All required financial filings must be emailed to captive.filings@dc.gov Please note: Non-RRGs filing the DC Blank shall file the electronic version of the DC Blank in both PDF and Excel formats.</p> <p>All electronic filings must clearly reflect executed signatures. Electronic signatures such as DocuSign and Adobe are acceptable.</p>
3. Signatures:	All Annual Statements and RRG Quarterly Statements: Signatures of at least two executive officers are required on all statements.
4. Certificate of Authority Renewals and Premium Tax Payments	<p>Effective January 1, 2026, it will be mandatory to use the National Association of Insurance Commissioners (“NAIC”) OPTins system (Online Premium Tax for Insurance) for all premium tax and certificate of authority (COA) renewal filings and payments.</p> <p>Further information regarding Certificate of Authority Renewals and Premium Tax Payments can be found here: https://disb.dc.gov/captiveins</p> <p>Questions: Email captive.filings@dc.gov and copy Sean O’Donnell at sean.odonnell@dc.gov</p>
5. Delivery Instructions:	All filings must be received no later than the indicated due date. If the due date falls on a weekend or holiday, then the deadline is extended to the next business day.
6. Late Filings:	Must be approved in advance by the Department.
7. Risk Finance Bureau Mailing Address:	DC Department of Insurance, Securities, and Banking Attention: Risk Finance Bureau 1050 First Street, NE, Suite 801, Washington, DC 20002

Appendix B

DC 2025 Annual/2026 Quarterly Filing Checklist for Captive Insurance Companies

	Due Date [#]			
	Risk Retention Groups	Non RRGs	Branch	Cells
UNAUDITED FINANCIAL STATEMENTS				
Annual Financial Statement	√ 3/2	√ 3/2		√ 3/2*
Quarterly Financial Statement	√ 5/15 √ 8/15 √ 11/15			
Other			√ 6/30*	
AUDITED FINANCIAL STATEMENTS				
Audited Financial Statements ("AFS")	√ 6/1	√ 6/30		√ 6/30*
Communication of Internal Control Related Matters	√ Within 60 days of filing of the AFS	√ 6/30		√ 6/30*
Accountants' Qualifications Letter	√ 6/1	√ 6/30		√ 6/30*
ACTUARIAL OPINION				
Statement of Actuarial Opinion	√ 3/2	√ 6/30		√ 6/30*
Actuarial Opinion Summary	√ 3/15			
OTHER REQUIRED FILINGS				
Premium Tax Return and Payment	√ 3/2	√ 3/2	√ 3/2	√ 3/2*
Risk Based Capital filing	√ 3/2			
Reinsurance Attestation Supplement; Exceptions to the Reinsurance Attestation Supplement (if applicable)	√ 3/2			
Management's Discussion and Analysis	√ 4/2			
Cybersecurity & Identity Theft Insurance Coverage Supplement	√ 4/2			
Supplemental Investment Risk Interrogatories	√ 4/2			
Certificate of Authority renewal Form and Payment	√ 4/30	√ 4/30	√ 4/30	√ 4/30
Holding Company filings (Forms B, C and F), if applicable	√ 4/30			

If the due date falls on a weekend or holiday, then the deadline is extended to the next business day

√ Denotes required filing and due date

* For branch and cell reporting, refer to the "2025 Reporting Instructions, RFB" for further guidance