

**2024 ANNUAL/2025 QUARTERLY FILING CHECKLIST FOR
Vermont Domestic Special Purpose Financial Insurance Companies (SPFIs)**

***SPFIs licensed prior to 1/1/2014 are NOT required to file with the NAIC. SPFIs licensed 1/1/2014 and thereafter are required to file with the NAIC (see Bulletin C-2014-01).**

This checklist is not inclusive of all Vermont DFR regulatory requirements; The Commissioner may require additional documents/filings as warranted.

Electronic submissions only (except license renewal fees). See Filing address per filing type.

See Title 8: Banking and Insurance/Chapter 141: Captive Insurance Companies <https://legislature.vermont.gov/statutes/chapter/08/141>

Filing Type/Details	Description/Filing Address	Due Date ** /Date Submitted
NAIC FINANCIAL STATEMENT	Submit one unsecured PDF (reference SPFI name and license # in file name)	Prior to 3/1 **
Life, Accident & Health		
All SPFI Calendar Year-end Filers (as of 12/31/xxxx)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov	
Annual Statement (8 1/2" x 14")	Signed and notarized Jurat Page (verified by oath of two of its executive officers) Please see guidance on notarization here: Notarization Guidance	
NAIC Supplements	Risk-Based Capital (RBC) Report	
	Submit one unsecured PDF (reference SPFI name and license # in file name)	Prior to 4/1 **
	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov	
NAIC Supplements	Management Discussion & Analysis	
	Supplemental Investment Risk Interrogatories	
	Executive Summary of the PBR Actuarial Report	
	Life Summary of the PBR Actuarial Report	
	Variable Annuities Summary of the PBR Actuarial Report	
	PBR Actuarial Report (provide upon request)	
NAIC QUARTERLY STATEMENT	Submit one unsecured PDF (reference SPFI name and license # in file name)	Due Quarterly 5/15, 8/15, 11/15
All SPFI Calendar Year-end Filers (as of 3/31/xxxx) (as of 6/30/xxxx) (as of 9/30/xxxx)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov NAIC Quarterly Statement Form (Due 5/15/xxxx) NAIC Quarterly Statement Form (Due 8/15/xxxx) NAIC Quarterly Statement Form (Due 11/15/xxxx)	
HOLDING COMPANY SYSTEM REGULATION FOR SPFIs	Submit one unsecured PDF (reference captive name and license # in file name)	On or before 3/15
SPFIs (as of 12/31/xxxx)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov	
Holding Company Filings	Holding Company Form B, C & F, when applicable	
LICENSE RENEWAL FEE	\$5,000 payable to: Vermont Department of Financial Regulation; include SPFI Name and license #	On or before 4/1
All SPFI Filers (annually)	Mail to: VTDFR-Captives, 89 Main St, Drawer 20, Montpelier, VT 05620-3101 or by Wire: for confirmation of Wire Transfer Instructions contact (802) 828-3304	
AUDIT	Submit one unsecured PDF (reference SPFI name and license # in file name)	On or before 6/30
All SPFI Calendar Year-end Filers (as of 12/31/xxxx)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov Certified By Vermont Approved CPA	
Audited Financial Statement	Audited Financial Statement, including: Report of Evaluation of Internal Controls Accountant's Letter of Qualifications Certification of Review of Audit Work Papers	
ACTUARIAL	Submit one unsecured PDF (reference SPFI name and license # in file name)	On or before 6/30
All SPFI Calendar Year-end Filers (as of 12/31/xxxx)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov Certified By Vermont approved Actuary	
Certification of Loss Reserves and Loss Expense Reserves	Statement of Actuarial Opinion Statement of Actuarial Opinion on X-Factors Statement of non-guaranteed elements-NAIC Exhibit 5 Int. #3 Statement of par/non-par policies - NAIC Exhibit 5 Int. #1&2 Regulatory Asset Adequacy Issues Summary - (Filed with Vermont only)	
*****REMINDER to submit NAIC REGULATORY REPORTING to NAIC.org (Financial Filings) as required*****		
OTHER REQUIRED FILINGS:	Submit one unsecured PDF (reference RRG name and license # in file name)	
VERMONT CAPTIVE INSURANCE TAX RETURN	Copy of executed Vermont Captive Insurance Tax Return and support of reported premium submitted to: DFR.CaptiveFinancialFilings@vermont.gov	Due by 3/15
MATERIAL VARIANCES LETTER	Submit one unsecured PDF (reference SPFI name and license # in file name) or link to online	Due annually
All SPFI Filers	Material Variances Letter (filed with VT DFR only)	
PARENT/SPONSOR ANNUAL FINANCIAL STATEMENT	Submit one unsecured PDF (reference SPFI name and license # in file name) or link to online	Due annually upon release
All SPFI Filers (as of Parent company year-end)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov Annual Financial Statements of ultimate controlling parent. Note: Foreign currency must be converted to US\$ and statements marked as Private and Confidential, if applicable.	
REINSURER AUDITED FINANCIAL STATEMENT	Submit one unsecured PDF (reference SPFI name and license # in file name) or link to online	Due annually upon release
Approved Affiliated or Captive Approved Reinsurer Filers Only (as of Reinsurer year-end)	Electronic Address: DFR.CaptiveFinancialFilings@vermont.gov Audited Financial Statement	

*NOTE: The Vermont Captive Insurance Tax Returns (CPT) and payments are to be filed no later than March 15th and are to be electronically filed and paid via the Vermont Department of Taxes online system. <https://www.myvtax.vermont.gov/>

** NOTE: For our domestic filing due date references of "Prior to", for our purposes we interpret the date to be the same as would fall under our domestic filing due date reference "On or before". Example: If the due date is Prior to March 15th, we consider the filing due date to be no later than March 15th, after which an extension would need to be requested. If a statutory due date falls on a weekend or a public holiday, it would then fall as due by the next business day.