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ROCKRIDGE GROUP

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UNIFORM FINANCIAL REPORTING PLAN
of the
American Land Title Association

March 1978

Note

To take advantage of several years of experience in implementing the Uniform Financial Reporting Plan in several states and of revisions in NAIC Form 9, the Uniform Financial Reporting Plan was revised in March 1978. This document reflects all such revisions and supercedes the March 1977 version.

UNIFORM FINANCIAL REPORTING PLANINTRODUCTION

Over the past several years, the level of regulatory activity in title insurance in the several states has increased markedly, and the amount of data required by regulatory authorities has substantially increased. Recognizing that this increase in regulatory requirements has important implications for the administrative costs borne by ALTA member companies, the ALTA Research and Accounting Committees, in cooperation with Arthur D. Little, Inc., have developed guidelines which may help ALTA member companies in organizing their efforts to address the regulatory data collection problem.

There are two general types of data required by regulatory authorities: *statistical data*, which describe the book of business written by insurers; and *financial data*, which describe the profitability of the title insurance enterprise. Both types of data are necessary for compliance with regulatory data requests; however, the methods appropriate for the collection of the two types differ substantially. The present document addresses only the problem of financial data collection.

The experience of the past few years has shown that the economic methods appropriate for title insurance rate analysis in any state require the construction of full income statements and balance sheets for individual state operations. Further, it has become clear that reliable figures in any one state can only be constructed if reports are prepared on a fully consolidated basis for all title insurance-related members of a holding company group, and if a consistent set of allocation rules is used by each company in its reports prepared for use in all jurisdictions.

The Uniform Financial Reporting Plan presents a framework for preparing consistent and reliable information. Its basic source of data is the NAIC Form 9, and it also draws upon management accounting information. By preparing the Uniform Financial Reporting Plan schedules in conjunction with Form 9 on an annual basis, companies can be assured of being able to meet any future regulatory request for state profitability data at minimal cost.

The Uniform Financial Reporting Plan is meant only as a suggested guide to action, and some companies may choose to accumulate data in alternate ways. However, companies adopting alternate methods should keep in mind the need to treat the issues of consolidation and allocation in a uniform manner in order to meet known regulatory requirements.

GENERAL INSTRUCTIONS

The Uniform Financial Reporting Plan includes schedules for carrying out three basic steps:

1. *Consolidation* of the financial results of all title insurance related members of a holding company group, including underwriters and owned or controlled agents/underwritten companies;
2. *Allocation* of the consolidated results to individual states; and
3. *Summarization* of each state's results in a form suitable for economic analysis.

While the Plan has been kept flexible to allow its use by companies with widely differing operating and accounting environments, there are some general principles which all companies should keep in mind when completing the Plan.

Consolidation

The fundamental reporting unit for the Plan is the *Group*, defined as all title insurance-related companies under common majority ownership or control, such as underwriters and owned or controlled agents/underwritten companies which file or use rates jointly. A full consolidation for both the income statement and the balance sheet of all companies within the Group must be performed to eliminate all intra-Group transactions and/or holdings. Minority interests in income and equity in companies included in the consolidation is not to be eliminated but will be included in consolidated income and net worth.

Allocation

The Plan does not mandate allocation rules except for certain items of non-operating income and expense and certain items on the balance sheet. However, it does require that consistent allocation rules be used, and to that end draws a distinction throughout between items which are *identifiable* and those which are *non-identifiable* as to operations in a single jurisdiction. Participants in the Plan must eliminate all identifiable items from the total pool, and carry out consistent allocation procedures for each non-identifiable residual item in order to obtain the individual jurisdiction "loadings." The sum of the allocations to all jurisdictions for each non-identifiable item *must* equal the consolidated total for that item.

The notes to the Plan schedules provide some guidelines for distinguishing between identifiable and non-identifiable items. The most important of these rest on the principle that the investment portfolio and its attendant income are strictly non-identifiable as to state, as are all liabilities, ✓ surplus, and other funds with the exception of loss reserves, statutory reserves, and possibly some short-term payables or prepayments.

Summarization

The Plan schedules used for consolidation and allocation maintain a level of detail comparable to that on pages 2 through 4 of Form 9. In order to use the results of these steps in economic analysis, it is useful to group various financial quantities into aggregates. Thus, the consolidation and allocation schedules really serve as worksheets which form the backup documentation for the summary schedules.

A Note on Revenue Accounting

There are significant differences from jurisdiction to jurisdiction in the statutory reporting of sales revenues. Therefore, the Plan requires that all revenues be reported gross as to agents'/underwritten companies' commissions/retentions. Further, sales of title evidence must not be netted against production expenses in the Plan schedules, but must also be reported on a gross basis in both revenue and expense accounts.

The Plan gives broad recognition to all sources of operating income accruing to title insurers. For companies included in the consolidated statements, all sources of revenue (both filed and non-filed) must be included; for non-consolidated agents/underwritten companies, all filed rate revenues as well as all other revenues in which the underwriter participates must be included. Thus, Line 3 of Schedules A1, A2, and A3 should include all risk, work, escrow and service charges to the extent that such are either a part of a filed rate or part of the underwriters' participation with the agent. The full agents' retention with respect to these items should be included in Lines 1 and 2 and reported in Line 9 of Schedules A1, A2, and A3.

A Note on Reconciliation to Other Filed Documents

In addition to preparing the Plan schedules, each participating company Group should maintain adequate backup documentation for all its allocation procedures, and should be prepared to reconcile its entries with similar entries on all other filed documents, including Form 9 and special state profitability and statistical reports. Reconcilability does *not* mean that all entries must be identical; rather, it means that differences must be identified and explained.

WORK SCHEDULES AND SPECIAL INSTRUCTIONS

The Uniform Financial Reporting Plan consists of nine work schedules:

Schedules A-1, A-2, and A-3 are for consolidation, allocation and summarization, respectively, of the income statements of the reporting Group.

Schedules B-1, B-2, and B-3 are for consolidation, allocation and summarization, respectively, of the asset side of the balance sheets of the reporting Group.

Schedules C-1, C-2, and C-3 are for consolidation, allocation and summarization, respectively, of the liabilities, surplus, and other funds side of the balance sheets of the reporting Group.

These nine schedules provide a consistent source of data for the preparation of the experience reports required in various jurisdictions. The schedules do not, in themselves, constitute experience reports; rather, companies should maintain these schedules as back-up documents for the specific reports required.

Schedule A Income and Expense Consolidation - Special Instructions

N.B. Revenue and expense items must be adjusted from their Form 9 values so that revenues are reported gross as to agents'/underwritten companies' commissions/retentions. Further, sales of title evidence must not be netted against production expenses, but must be shown on a gross basis in both revenue and expense accounts.

Underwriter Columns are entered from the Form 9's of all underwriters included in the company Group.

Agent/Underwritten Company columns are entered from the financial statements of all agents/underwritten companies included in the consolidation.

Consolidating/Elimination Entry columns are provided to adjust for all intra-Group transactions, primarily commissions/retentions, reinsurance, and sales of title evidence.

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE A-1 - INCOME AND EXPENSE CONSOLIDATION

Company	Underwriters From Form 9 Page 4 Adjusted			Owned/Controlled Agents/Underwritten Companies			Consolidating/Eliminating Entries			Consolidated Group Total (To Schedule A-2)
	Co. #1	Co. #2	Co. #N	Co. #1	Co. #2	Co. #N	Underwriter	Agent-Underwriter	Agent	
CALENDAR YEAR ENDED DECEMBER 31, 19__										
	OPERATING REVENUE									
1	Premiums Written.....									
2	Service Charges and Other Income.....									
3	GROSS SALES.....									
4	Reinsurance Assumed.....									
5	Reinsurance Ceded.....									
6	Net Increase in Statutory Reserve.....									
7	TOTAL OPERATING REVENUE.....									
	OPERATING EXPENSES									
8	Losses and Loss Adjustment Expense Incurred.....									
9	Commissions/Retentions.....									
	Other Operating Expenses (Classify as appropriate)									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31	TOTAL OPERATING EXPENSES.....									
	NON-OPERATING RETURNS									
32	Interest Paid on borrowed money, notes and encumbrances on real estate.....									
33	Investment Income - Tax Exempt - Before Expenses.....									
34	Investment Income - Dividends - Before Expenses.....									
35	Investment Income - Other - Before Expenses.....									
36	Net Realized Capital Gains (Losses).....									
37	Net Unrealized Capital Gains (Losses).....									
38	Investment expenses and other deductions (excludes interest expense, Line 32)									

Schedule A-2 - Income and Expense Allocation - Special Instructions

N.B. The symbol "I" next to a line item title indicates that the line item is strictly identifiable as to state; the symbol "N" indicates that an item is strictly non-identifiable as to state; the symbol "B" indicates that an item may have both identifiable and non-identifiable components.

Lines 1 through 31 are to be completed using the general principles of allocation discussed in the General Instructions to the Plan. Please note in particular that:

Sales (Lines 1 through 3) must be shown gross as to agents'/underwritten companies' commissions/retentions and gross as to sales of title evidence netted against production expenses in the statutory accounts. All income associated with a particular real property transaction should be assigned to the state in which the property is located, irrespective of where the transaction is consummated.

Reinsurance (Lines 4 and 5) may include both facultative and treaty components. Facultative reinsurance, assumed or ceded, is to be assigned to the State in which the covered risk is located. Treaty reinsurance must be allocated among states on an equitable basis.

Net Increase in Statutory Reserves (Line 6) must be reported as actually established based on changes in the book of business for each state.

Losses and Loss Adjustment Expenses (Line 8) directly associated with a particular risk must be assigned to the state in which the risk is located. Non-identifiable loss expenses, such as the salary cost of claims department staff and their related occupancy costs, must be allocated among states on an equitable basis.

Debt service expense (Line 32) must be allocated among states proportional to debt funds in each state (Schedule C-3, line 6).

Investment items (Lines 33 through 38) must be allocated among states proportional to total capital in each state (Schedule C-3, line 7).

Schedule A-3 - Income and Expense Summary - Special Instructions

The entries in Schedule A-3 are drawn from Schedule A-2. Special requirements in particular jurisdictions may require different definitions of the portion of gross sales identified as "underwriting and examination fees" (Line 1) versus "other service income" (Line 2); otherwise, the following reconciliation schedule should hold exactly:

<u>Schedule A-3</u> State Column or Total Column Line #	<u>must equal</u>	<u>Schedule A-2</u> State Columns or Total All States Column Line #, Subcolumn
3		3, identifiable
4		4, identifiable plus non-identifiable
5		5, identifiable plus non-identifiable
6		6, identifiable
7		7, identifiable plus non-identifiable
8		8, identifiable plus non-identifiable
9		9, identifiable
10		31 less 8 and 9, identifiable
11		31 less 8, non-identifiable
12		31, identifiable plus non-identifiable
13		32, non-identifiable
16		33, non-identifiable
17		34, non-identifiable
18		35, non-identifiable
19		36, non-identifiable
20		37, non-identifiable
21		38, non-identifiable

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE A-3 - INCOME AND EXPENSE SUMMARY

Company _____

CALENDAR YEAR ENDED DECEMBER 31, 19__

State #1 State #2 State #N Total All States

	State #1	State #2	State #N	Total All States
1. Underwriting and Examination Fees				
2. Escrow, Settlement, and Other Fees				
3. Subtotal (1 + 2)				
4. Reinsurance Assumed				
5. Reinsurance Ceded				
6. Ret Increase in Statutory Reserves				
7. Subtotal (3 + 4 - 5 - 6)				
8. Loss and Loss Adjustment Expenses				
9. Commissions/Retentions				
10. Other Identifiable Expenses				
11. Non-Identifiable Expenses				
12. Subtotal (8 + 9 + 10 + 11)				
13. Interest Expense				
14. Operating Expense (12 + 13)				
15. Operating Income (7 - 14)				
NON-OPERATING RETURNS				
16. Investment Income - Tax Exempt - Before Expenses				
17. Investment Income - Dividends - Before Expenses				
18. Investment Income - Other - before Expenses				
19. Net Realized Capital Gains (Losses)				
20. Net Unrealized Capital Gains (Losses)				
21. Investment Expenses and Other Deductions (Excludes Interest Paid on Borrowed Money, Notes, and Encumbrances on Real Estate, See Line 13)				

Schedule B-1 - Asset Consolidation - Special Instructions

Underwriter columns are entered from the Form 9's of all underwriters included in the company Group.

Agent/Underwritten Company columns are entered from the financial statements of all agents/underwritten companies included in the consolidation. The assets of subsidiary companies which do not maintain statutory books may be treated as admitted, non-admitted, or some combination as is convenient.

Consolidating/Eliminating Entry columns are provided to adjust for all intra-Group holdings, primarily subsidiary stock held, intercorporate debt, and intercorporate receivables and payables.

Schedule B-2 - Asset Allocation - Special Instructions

N. B. The symbol "I" next to a line item title indicates that the line item is strictly identifiable as to state; the symbol "N" indicates that an item is strictly non-identifiable as to state/ the symbol "B" indicates that an item may have both identifiable and non-identifiable components.

Identifiable assets include such items as title plants, deposits with county recorders, and assets of branch offices conducting business in only one state. It does *not* include any investment securities, even if they are held in satisfaction of the requirements of a particular jurisdiction.

Non-identifiable assets include all other assets of the reporting Group, primarily investment securities, headquarters facilities, and the assets of regional offices. Assets of regional offices are to be allocated among states within the region on an equitable basis. The remaining non-identifiable assets are to be allocated in two steps:

*we think this
Now admit*

*transfer sufficient
amount from total
company non identifiable
asset to state
non identifiable*

1. To the extent that identifiable assets plus allocated regional office assets in a state fall short of identifiable liabilities (cf. Schedule C-2), non-identifiable assets are to be assigned to the state to remove the shortfall.

*Allocate an additional
amount of
non identifiable based
on premiums.*

2. The balance of non-identifiable assets is to be allocated among all states on an equitable basis.

Real estate owned may be identifiable or non-identifiable. Real property acquired in satisfaction of claims should be treated as non-identifiable. Real property used in the conduct of business should be treated as non-identifiable if occupancy charges are made against income. All real estate held must be reported gross as to encumbrances.

UNIFORM FINANCIAL REPORTING PLAN
 SCHEDULE B-2 - ASSET ALLOCATION

Company	CALENDAR YEAR ENDED DECEMBER 31, 19__	Consolidated Group Total (From Schedule B-1)	Identifiable Items				Non-Identifiable Items			
			State #1	State #2	State #3	All States Total	State #1	State #2	State #3	All States Total
ADMITTED										
1	Bonds.....	(N)								
2	Stocks.....	(N)								
2.1	Preferred Stocks.....	(N)								
2.2	Common Stocks.....	(N)								
3	Mortgage Loans on Real Estate.....	(N)								
4	Real Estate:	(N)								
4.1	Properties Occupied by the Company.....	(B)								
4.2	Other Properties.....	(B)								
5	Collateral Loans.....	(N)								
6	Cash and Bank Deposits.....	(N)								
7	(N)								
8	Title Plant.....	(B)								
9	Title Insurance Premiums and Fees, and Other.....	(I)								
10	Fees Receivable.....	(B)								
11	Other Assets.....	(B)								
12	(B)								
13	(B)								
14	Interest, Dividends and Real Estate Income Due and Accrued.....	(B)								
15	(N)								
16	(B)								
17	(B)								
18	Total Admitted Assets.....	(B)								
NON-ADMITTED										
19	Company's Stock Owned.....	(N)								
20	Loans on Company's Stock.....	(N)								
21	Title Plants.....	(I)								
22	(B)								
23	Equipment, Furniture and Supplies.....	(B)								
24	(B)								
25	Loans on Personal Security, Endorsed or Not.....	(B)								
26	Other Assets not Admitted (Itemize):	(B)								
a	(B)								
b	(B)								
c	(B)								
d	(B)								
e	(B)								
27	Total Non-Admitted Assets.....	(B)								
28	TOTAL ASSETS (Line 18 plus Line 27).....	(B)								

Schedule B-3 - Asset Summary - Special Instructions

The entries in Schedule B-3 are drawn from Schedule B-2. The following reconciliation schedule should hold exactly:

<u>Schedule B-3</u>		<u>Schedule B-2</u>
<u>State Column or Total Column</u>	<u>must equal</u>	<u>State Columns or</u>
<u>Line #</u>		<u>Total All States Column</u>
		<u>Line #, Subcolumn</u>
1		8, identifiable
2		18 less 8, identifiable
3		18, non-identifiable
4		18, identifiable plus non- identifiable
5		21, identifiable
6		27 less 21, identifiable
7		27, non-identifiable
8		27, identifiable plus non- identifiable
9		28, identifiable plus non- identifiable

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE B-3 - ASSET SUMMARY

Company _____

CALENDAR YEAR ENDED DECEMBER 31, 19__

	State #1	State #2	...	State #N	Total All States
<u>Admitted Assets</u>					
1 Title Plants.....
2 Other Identifiable Admitted Assets.....
3 Non-Identifiable Admitted Assets.....
4 Subtotal (1 + 2 + 3).....
<u>Non-Admitted Assets</u>					
5 Title Plants.....
6 Other Identifiable Non-Admitted Assets.....
7 Non-Identifiable Non-Admitted Assets.....
8 Subtotal (5 + 6 + 7).....
9 TOTAL ASSETS (4 + 8).....

Schedule C-1 - Liabilities, Surplus, and Other Funds Consolidation-
Special Instructions

Underwriter columns are entered from the Form 9's of all underwriters included in the company Group.

Agent/Underwritten Company columns are entered from the financial statements of all agents/underwritten companies included in the consolidation.

Consolidating/Eliminating Entry columns are provided to adjust for all intra-Group holdings, primarily subsidiary stock held, intercorporate debt, and intercorporate receivables and payables.

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE C-1 - LIABILITIES, SURPLUS, AND OTHER FUNDS CONSOLIDATION

Company	Underwriters From Form 9 Page 3 Adjusted				Owned/Controlled Agents/Underwritten Companies				Consolidating/Eliminating Entries				Consolidated Group Total (To Schedule C-2)	
	Co. #1		Co. #2		Co. #1		Co. #2		Underwriter-Agent		Underwriter-Agent			
	Co. #1	Co. #2	Co. #1	Co. #2	Co. #1	Co. #2	Co. #1	Co. #2	Underwriter-Agent	Underwriter-Agent	Underwriter-Agent	Underwriter-Agent		
1	(a)	Losses adjusted but unpaid, due and to become due.....												
	(b)	Reserve for undetermined title losses of which notice has been received.....												
2		Reserves required by law, or otherwise:												
	(a)	Statutory premium reserve.....												
	(b)												
3		Commissions, brokerage and other charges due or accrued to attorneys, agents and real estate brokers.....												
4		Other expenses.....												
5		Taxes, licenses and fees.....												
6		Total unpaid expenses.....												
7		Federal income taxes.....												
8		Borrowed money.....												
9		Encumbrances on real estate.....												
10		Interest.....												
11		Premiums and other consideration received in advance.....												
12		Unearned interest and real estate income received in advance.....												
13		Amounts withheld or retained by company for account of others.....												
14		Dividends declared and unpaid.....												
15		Notes payable.....												
17		Total Liabilities.....												
18		Capital paid up.....												
19		Gross paid in and contributed surplus.....												
20		Special surplus funds:												
	(a)												
	(b)												
	(c)												
21		Unassigned funds.....												
22		Surplus as regards policyholders.....												
23		Contribution to surplus from non-admitted assets.....												
24		TOTAL LIABILITIES, SURPLUS AND OTHER FUNDS.....												

Schedule C-2 - Liabilities, Surplus, and Other Funds Allocation -
Special Instructions

N.B. The symbol "I" next to a line item title indicates that the line item is strictly identifiable as to state; the symbol "N" indicates that an item is strictly non-identifiable as to state; the symbol "B" indicates that an item may have both identifiable and non-identifiable components.

Identifiable funds include loss reserves, statutory reserves, and possibly some short-term payables or prepayments.

Non-identifiable funds include all other liabilities (including encumbrances on real estate), statutory surplus, special reserves, and the contribution to surplus of non-admitted assets. All non-identifiable funds line items must be allocated to each state using a constant ratio that balances each state balance sheet. The allocation ratio to be applied is therefore

$$\text{Ratio} = \frac{\text{State Assets} - \text{State Identifiable Funds}}{\text{Total Assets} - \text{Total Identifiable Funds}}$$

In carrying out the allocation, it is important to carry at least eight decimal places in this ratio in order to ensure balance sheet closure.

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE C-2 - LIABILITIES, SURPLUS AND OTHER FUNDS ALLOCATION

Company

ALEXANDER YEAR ENDED DECEMBER 31, 19__

	Consolidated Group Total (From Schedule C-1)	Identifiable Items			Non-Identifiable Items			All States Total
		State #1	State #2	State #N	State #1	State #2	State #N	
1 (a) Losses adjusted but unpaid, due and to become due..... (1)								
(b) Reserve for undetermined title losses of which notice has been received..... (1)								
2 Reserves required by law, or otherwise: (a) Statutory premium reserve..... (1)								
(b) Commissions, brokerage and other charges due or accrued to attorneys, agents and real estate brokers..... (1)								
3 Other expenses..... (1)								
4 Taxes, licenses and fees..... (b)								
5 Total unpaid expenses..... (b)								
6 Federal income taxes..... (b)								
7 Borrowed money..... (N)								
8 Encumbrances on real estate..... (N)								
9 Interest..... (N)								
10 Premiums and other consideration received in advance..... (N)								
11 Unearned interest and real estate income received in advance..... (N)								
12 Amounts withheld or retained by company for account of others..... (N)								
13 Dividends declared and unpaid..... (N)								
14 Notes payable..... (B)								
15 Total Liabilities..... (B)								
16 Capital paid up..... (N)								
17 Gross paid in and contributed surplus..... (N)								
18 Special surplus funds: (a)..... (N)								
(b)..... (N)								
(c)..... (N)								
19 Unassigned funds..... (N)								
20 Surplus as regards policyholders..... (N)								
21 Contribution to surplus from non-admitted assets..... (N)								
22 TOTAL LIABILITIES, SURPLUS AND OTHER FUNDS..... (B)								

Schedule C-3 - Liabilities, Surplus, and Other Funds Summary - Special Instructions

The entries in Schedule C-3 are drawn from Schedule C-2. The following reconciliation schedule should hold exactly:

<u>Schedule C-3</u>	<u>must equal</u>	<u>Schedule C-2</u>
<u>State Column or Total Column</u>		<u>State Columns or</u>
<u>Line #</u>		<u>Total All States Column</u>
		<u>Line #, Subcolumn</u>
1		1(a) plus 1(b), identifiable
2		2(a) plus 2(b), identifiable
3		22, non-identifiable
4		23, non-identifiable
6		8 plus 9 plus 16, non-identifiable
8		17 less 1 less 2 less 8 less 9 less 16, identifiable plus non- identifiable
9		24, identifiable plus non- identifiable

UNIFORM FINANCIAL REPORTING PLAN

SCHEDULE C-3 - LIABILITIES, SURPLUS, AND OTHER FUNDS

Company _____

CALENDAR YEAR ENDED DECEMBER 31, 19__

	State #1	State #2	...	State #N	Total All States
1 Loss Reserves.....					
2 Statutory Reserves.....					
3 Surplus as regards Policyholders.....					
4 Contribution to Surplus of Non-Admitted Assets.....					
5 Net Worth (3 + 4).....					
6 Total Debt Funds.....					
7 Capital (1 + 2 + 5 + 6).....					
8 Other Liabilities.....					
9 TOTAL LIABILITIES, SURPLUS AND OTHER FUNDS (7 + 8).....					