



FINANCIAL CONDITION REPORT ON EXAMINATION

OF THE

ANTHEM LIFE & DISABILITY INSURANCE COMPANY

AS OF DECEMBER 31, 2022

EXAMINER:

SAUHUNG YOU

DATE OF REPORT:

JUNE 17, 2024

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KATHY HOCHUL
Governor



ADRIENNE A. HARRIS
Superintendent

June 24, 2024

Honorable Adrienne A. Harris
Superintendent of Financial Services
New York, New York 10004

Dear Adrienne A. Harris:

In accordance with instructions contained in Appointment No 32490, dated March 2, 2023, and annexed hereto, an examination has been made into the condition and affairs of Anthem Life & Disability Insurance Company, hereinafter referred to as “the Company.” The Company’s home office is located at 1 Penn Plaza, 35th Floor, New York, NY 10119. The Company’s administrative office is located at 220 Virginia Avenue, Indianapolis, IN 46204.

Wherever “Department” appears in this report, it refers to the New York State Department of Financial Services.

The report indicating the results of this examination is respectfully submitted.

1. EXECUTIVE SUMMARY

The material findings, comment, and violations contained in this report are summarized below.

- The Company is not in compliance with Insurance Circular Letter No. 33 (1979) by failing to file a copy of its tax allocation agreement with this Department within 30 days of electing to participate in a consolidated tax return. (See item 3D of this report.)
- The Company violated Section 1408(b) of the New York Insurance Law by failing to obtain prior approval from the superintendent before receiving surplus contributions from its parent. (See item 3D of this report.)
- The Company violated Section 1505(c) of the New York Insurance Law by failing to obtain prior approval from the superintendent before entering with its parent into a surplus transaction that involved more than five percent of its prior year's admitted assets. (See item 3D of this report.)
- The Company violated Section 1503(a) of the New York Insurance Law by failing to amend the holding company's registration with the superintendent within thirty days following the change of its ultimate parent company's name. (See item 3D of this report.)
- The Company violated Section 4211(a) of the New York Insurance Law by failing to file a copy of the notice of election with the Superintendent at least ten days before the day of such election. (See item 3D of this report.)

2. SCOPE OF EXAMINATION

The examination of the Company was a full-scope examination as defined in the National Association of Insurance Commissioners' ("NAIC's") *Financial Condition Examiners Handbook, 2023 Edition* (the "Handbook"). The examination covers the five-year period from January 1, 2018, to December 31, 2022. The examination was conducted observing the guidelines and procedures in the Handbook and, where deemed appropriate by the examiner, transactions occurring subsequent to December 31, 2022 but prior to the date of this report (i.e., the completion date of the examination) were also reviewed.

The examination was conducted on a risk-focused basis in accordance with the provisions of the Handbook published by the NAIC. The Handbook guidance provides for the establishment of an examination plan based on the examiner's assessment of risk in the insurer's operations and utilizing that evaluation in formulating the nature and extent of the examination. The examiner planned and performed the examination to evaluate the current financial condition as well as identify prospective risks that may threaten the future solvency of the insurer. The examiner identified key processes, assessed the risks within those processes and evaluated the internal control systems and procedures used to mitigate those risks. The examination also included assessing the principles used and significant estimates made by management, evaluating the overall financial statement presentation, and determining management's compliance with New York statutes and Department guidelines, Statutory Accounting Principles as adopted by the Department, and annual statement instructions.

The examination of the Company was coordinated and conducted with the multi-state group examination of the Elevance Health, Inc. ("Elevance Health") holding company system. The multi-state group examination was led by the State of Indiana with participation from the states of Arizona, Arkansas, California, Colorado, Connecticut, Iowa, Kentucky, Louisiana, Maryland, Maine, Missouri, Mississippi, Nebraska, New Jersey, New York, Ohio, Pennsylvania, Texas, Virginia, Washington, Wisconsin and West Virginia, and the District of Columbia. Since the lead and participating states are all accredited by the NAIC, all states deemed it appropriate to rely on each other's work.

Information about the Company's organizational structure, business approach and control environment were utilized to develop the examination approach. The Company's risks and

management activities were evaluated incorporating the NAIC's nine branded risk categories. These categories are as follows:

- Pricing/Underwriting
- Reserving
- Operational
- Strategic
- Credit
- Market
- Liquidity
- Legal
- Reputational

The Company was audited annually, for the years 2018 through 2022, by the accounting firm of Ernst & Young LLP. The Company received an unqualified opinion in all years. Certain audit workpapers of the accounting firm were reviewed and relied upon in conjunction with this examination. The Company shares an internal audit department, and a separate risk, control and assurance department, with Elevance Health, Inc. the Company's ultimate parent, which has the responsibility of assessing the internal control structure and compliance with the Sarbanes-Oxley Act of 2002 ("SOX"). The Company is not subject to SOX and was under the \$500 million premium threshold for the Model Audit Rule. Where applicable, SOX workpapers and reports of Elevance Health were reviewed and portions were relied upon for this examination.

The examiner reviewed the corrective actions taken by the Company with respect to the violation and recommendation contained in the prior report on examination. The results of the examiner's review are contained in item 7 of this report.

This report on examination is confined to financial statements and comments on those matters which involve departure from laws, regulations, or rules, or which require explanation or description.

3. DESCRIPTION OF COMPANY

A. History

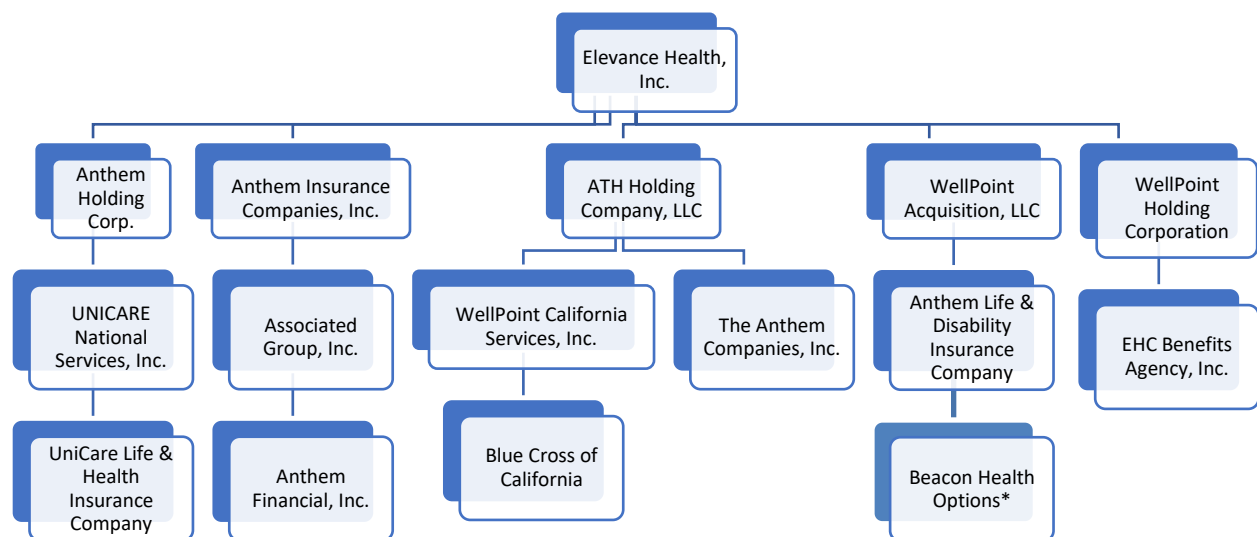
The Company was incorporated under the laws of the State of New York on October 13, 2006, and was licensed and commenced business on January 1, 2009. Initial resources of \$16,000,000, consisting of common capital stock of \$2,000,000 and paid in and contributed surplus of \$14,000,000, were provided through the sale of 1,000 shares of common stock (with a par value of \$2,000 per share) for \$16,000 per share. The Company received \$4.5 million contributed surplus from its parent in 2020 and another \$13 million contributed surplus from its parent in 2021.

B. Holding Company

The Company is a wholly owned subsidiary of WellPoint Acquisition, LLC (“WPA”), which is a wholly owned subsidiary of Elevance Health, a publicly traded company and the ultimate parent of the Company. Elevance Health was formerly, Anthem, Inc. which changed its name effective June 27, 2022.

C. Organizational Chart

An organization chart reflecting the relationship between the Company and significant entities in its holding company system as of December 31, 2022, follows:



*On March 1, 2023, Beacon Health Options changed its name to Carelon Behavioral Health, Inc.

D. Service Agreements

The Company had two service agreements in effect with affiliates during the examination period.

Type of Agreement and Department File Number	Effective Date	Provider(s) of Service(s)	Recipient(s) of Service(s)	Specific Services Covered	Expense* For Each Year of the Examination
Master Administrative Services Agreement File No. 35562 Amendment File No. 56234	01/01/2008 08/01/2018	Elevance Health	The Company	Marketing; sales; claims; customer service; enrollment and billing; operations support; print mail; underwriting; medical and disability condition management; actuarial valuation; decision support; external affairs; finance; general administration and management; human resources; legal compliance; planning; information technology support; and investment advisory services	2018 \$(2,081,909) 2019 \$(3,001,752) 2020 \$(1,975,248) 2021 \$(2,579,803) 2022 \$(2,321,612)
Management Service Agreement File No. 62933	10/01/2022	Beacon Health Options	The Company	Provide services to members in accordance with an employee assistance program and other assistance programs administered by the Company for its self-funded business.	2022 \$(236,749)

*Amount of Expense Incurred by the Company

The Company participates in a federal income tax allocation agreement with its parent and affiliates.

New York Insurance Circular Letter No. 33 (1979) states in part, the following:

“... Pursuant to the provisions of Section 27 of the insurance Law every domestic insurer is directed to notify this Department within 60 days of this circular letter if it participates in a consolidated tax return and to submit a copy of its tax allocation agreement with such notification. Any domestic insurer which currently does not participate in a consolidated tax return shall file a copy of its tax allocation agreement with this Department within 30 days of electing to do so. Furthermore, notification to this Department should be given within 30 days of any amendment to or termination of a tax allocation agreement ...”

The examiner reviewed the Department’s record of filings and noted there was no record of the 2008 consolidated tax agreement between the Company and its parent company Elevance Health.

The Company is not in compliance with Insurance Circular Letter No. 33 (1979) by failing to file a copy of its tax allocation agreement with this Department within 30 days of electing to participate in a consolidated tax return.

Section 1408(b) of the New York Insurance Law states:

“This section shall not prohibit ... the owner of previously lawfully acquired shares of an insurance company from making a contribution, with the approval of the superintendent, to such other insurance company’s surplus. . .”

Section 1505(c) of the New York Insurance Law states:

“The superintendent’s prior approval shall be required for the following transactions between a domestic controlled insurer and any person in its holding company system: sales, purchases, exchanges, loans or extensions of credit, or investments, involving five percent or more of the insurer's admitted assets at last year-end.”

The review indicated that the Company received a \$4.5 million surplus contribution from WPA, its parent company, on December 21, 2020. However, the Company failed to notify the superintendent of such infusion.

The Company violated Section 1408(b) of the New York Insurance Law by failing to obtain prior approval from the superintendent before receiving surplus contributions from its parent.

The Company violated Section 1505(c) of the New York Insurance Law by failing to obtain prior approval from the superintendent before entering with its parent into a surplus transaction that involved more than five percent of its prior year's admitted assets.

The Company has since remediated the issue by filing with the Department the surplus contribution and received the Department's approval on December 10, 2021.

Section 1503(a) of New York Insurance Law states:

“Every person who becomes a controlled insurer shall, within thirty days thereafter register with the superintendent and shall amend the registration within thirty days following any change in the identity of its holding company or any other material change to the information provided in the registration. The registration shall be in such form and shall contain such matters as the superintendent prescribes. The superintendent may grant reasonable extensions of the time to register.”

A review of the Company's March 2022 quarterly statement indicated that the Company's ultimate parent “Anthem Inc.” changed its name to “Elevance Health Inc”. The name change was effective June 27, 2022. However, the Company did not amend the holding company registration with the superintendent within thirty days following the change of its ultimate parent company's name.

The Company violated Section 1503(a) of the New York Insurance Law by failing to amend the holding company's registration with the superintendent within thirty days following the change of its ultimate parent company's name.

The Company has since remediated the issue by amending the registration with the superintendent on August 4, 2022.

E. Management

The Company's by-laws provide that the board of directors shall be comprised of not less than 7 and not more than 25 directors. If the Company's admitted assets fall below one and one-half billion dollars, the number of directors may be decreased to a minimum of nine members. Directors are elected for a period of one year at the annual meeting of the stockholders held in May of each year. As of December 31, 2022, the board of directors consisted of eight members. Meetings of the board are held quarterly.

The eight board members and their principal business affiliation as of December 31, 2022, were as follows:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Victor J. DeStefano Rockville Center, New York	Regional Vice President Anthem Life & Disability Insurance Company	2021
Sean M. Doolan* Albany, New York	Attorney Hinman Straub, P.C.	2006
Paige A. Kerns Westfield, Indiana	Staff Vice President, Financial Strategy & Planning Anthem Life & Disability Insurance Company	2021
William T. Lee* Roosevelt, New York	Retired Executive Vice President UNITE HERE	2006
David A. Levene* Melville, New York	Retired Executive Vice President Metropolitan Life Insurance Company	2008
Alan J. Murray Syosset, New York	President, New York Markets Anthem Life & Disability Insurance Company	2018
Scott W. Towers Lakeville, Minnesota	President, Dental Anthem Life & Disability Insurance Company	2021
Jay H. Wagner Carmel, Indiana	Counsel & Secretary Anthem Life & Disability Insurance Company	2008

*Not affiliated with the Company or any other company in the holding company system

Effective May 31, 2023, Mr. Alan J. Murray left the Company, and the position was not replaced.

The examiner's review of the minutes of the meetings of the board of directors and its committees indicated that meetings were well attended, and that each director attended a majority of meetings.

Section 4211(a) of the New York Insurance Law states:

“No election of directors of a domestic stock life insurance company shall be valid unless a copy of the notice of election shall have been filed in the office of the superintendent at least ten days before the day of such election in addition to the

service thereof, as required by section six hundred five of the business corporation law.”

The examiner reviewed the Department’s record of filings made in accordance with Section 4211(a) of the New York Insurance Law and noted that there was no notice of election filed with the Department during the period under examination period.

The Company violated Section 4211(a) of the New York Insurance Law by failing to file a copy of the notice of election with the Superintendent at least ten days before the day of such election.

The following is a listing of the principal officers of the Company as of December 31, 2022:

<u>Name</u>	<u>Title</u>
Scott W. Towers	President and Chairperson of the Board
Eric K. Noble	Treasurer
Jay H. Wagner	Secretary
Serena H. Richard	Assistant Secretary
Vincent E. Scher	Assistant Treasurer

As of December 31, 2022, the designated consumer services officer per Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64) is Dottie Tieslan, Senior Vice President, Life & Disability Claims and Operations.

Effective December 31, 2023, Ms. Serena H. Richard was retired, and the position was not replaced.

4. TERRITORY AND PLAN OF OPERATIONS

The Company is authorized to write life insurance, annuities, and accident and health insurance as defined in paragraphs 1, 2 and 3 of Section 1113(a) of the New York Insurance Law.

The Company is licensed to transact business only in the State of New York. In 2022, all life premiums and accident and health premiums were received from New York. Policies are written on a non-participating basis.

A. Statutory and Special Deposits

As of December 31, 2022, the Company had \$4,400,000 (par value) of United States Political Subdivision Bonds on deposit with the State of New York, its domiciliary state, for the benefit of all policyholders, claimants, and creditors of the Company.

B. Direct Operations

The Company offers group life and group accident and health insurance. Group life insurance consists of term life insurance; group accident and health consists of short- and long-term disability, and accidental death and dismemberment coverage offered in partnership with Empire HealthChoice Assurance Company to market its products. The Company also operates as a licensee of the Blue Cross Blue Shield Association.

The Company's agency operations are conducted on a general agency basis.

C. Reinsurance

As of December 31, 2022, the Company had reinsurance treaties in effect with three companies, all were authorized or accredited. The Company's group life and accident and health business is reinsured on an excess of loss and yearly renewable term bases. Reinsurance is provided on an automatic and facultative basis.

The maximum retention limit for group life contracts is \$300,000. The total face amount of life insurance ceded as of December 31, 2022, was \$204,298,109, which represents 2.8% of the total face amount of life insurance in force.

5. FINANCIAL STATEMENTS

The following statements show the assets, liabilities, capital and surplus as of December 31, 2022, as contained in the Company's 2022 filed annual statement, a condensed summary of operations and a reconciliation of the capital and surplus account for each of the years under review. The examiner's review of a sample of transactions did not reveal any differences which materially affected the Company's financial condition as presented in its financial statements contained in the December 31, 2022, filed annual statement.

A. Independent Accountants

The firm of Ernst & Young LLP was retained by the Company to audit the Company's combined statutory basis statements of financial position of the Company as of December 31 of each year in the examination period, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the year then ended.

Ernst & Young LLP concluded that the statutory financial statements presented fairly, in all material respects, the financial position of the Company at the respective audit dates. Balances reported in these audited financial statements were reconciled to the corresponding years' annual statements with no discrepancies noted.

B. Net Admitted Assets

Bonds	\$22,887,515
Cash, cash equivalents and short-term investments	24,929,325
Securities lending reinvested collateral assets	787,055
Investment income due and accrued	244,018
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	1,721,889
Reinsurance:	
Amounts recoverable from reinsurers	18,758
Amounts receivable relating to uninsured plans	8,151
Current federal and foreign income tax recoverable and interest thereon	<u>201,253</u>
 Total admitted assets	 <u>\$50,797,964</u>

C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	\$ 1,596,114
Aggregate reserve for accident and health contracts	9,836,519
Liability for deposit-type contracts	2,102,446
Contract claims:	
Life	2,470,995
Accident and health	650,803
Premiums and annuity considerations for life and accident and health contracts received in advance	7,352
Contract liabilities not included elsewhere:	
Interest maintenance reserve	273,063
Commissions to agents due or accrued	628,394
General expenses due or accrued	431,631
Taxes, licenses and fees due or accrued, excluding federal income taxes	133,983
Amounts withheld or retained by company as agent or trustee	732
Remittances and items not allocated	141,589
Miscellaneous liabilities:	
Asset valuation reserve	122,431
Payable to parent, subsidiaries and affiliates	2,631,758
Payable for Securities Lending	787,055
Escheat liability	114,336
Miscellaneous liabilities	<u>407</u>
 Total liabilities	 <u>\$21,929,609</u>
 Common capital stock	 \$ 2,000,000
Gross paid in and contributed surplus	33,500,000
Unassigned funds (surplus)	<u>(6,631,645)</u>
Surplus	<u>\$26,868,355</u>
Total capital and surplus	<u>\$28,868,355</u>
 Total liabilities, capital and surplus	 <u>\$50,797,964</u>

D. Condensed Summary of Operations

	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Premiums and considerations	\$8,883,986	\$18,423,775	\$29,728,964	\$41,702,367	\$31,372,492
Investment income	594,295	751,608	673,166	816,239	913,135
Commissions and reserve adjustments on reinsurance ceded	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>564,317</u>
Total income	<u>\$9,478,281</u>	<u>\$19,175,383</u>	<u>\$30,402,130</u>	<u>\$42,518,606</u>	<u>\$32,849,944</u>
Benefit payments	\$5,952,955	\$11,942,110	\$27,376,873	\$40,275,139	\$18,773,916
Increase in reserves	374,402	515,981	2,552,907	4,403,237	496,850
Commissions	1,315,190	1,757,040	2,971,651	3,503,730	4,149,181
General expenses and taxes	2,228,851	3,251,373	3,152,666	4,166,124	2,660,669
Miscellaneous deductions	<u>0</u>	<u>78</u>	<u>100,000</u>	<u>0</u>	<u>(100,000)</u>
Total deductions	<u>\$9,871,398</u>	<u>\$17,466,582</u>	<u>\$36,154,097</u>	<u>\$52,348,230</u>	<u>\$25,980,616</u>
Net gain (loss)	\$ (393,117)	\$ 1,708,801	\$ (5,751,967)	\$ (9,829,624)	\$ 6,869,328
Federal and foreign income taxes incurred	<u>11,025</u>	<u>243,393</u>	<u>(371,312)</u>	<u>(8,219)</u>	<u>252,434</u>
Net gain (loss) from operations before net realized capital gains	\$ (404,142)	\$ 1,465,407	\$ (5,380,655)	\$ (9,821,405)	\$ 6,616,894
Net realized capital gains (losses)	<u>(54,941)</u>	<u>(254)</u>	<u>(519)</u>	<u>(33,597)</u>	<u>(627)</u>
Net Income	<u>\$ (459,083)</u>	<u>\$ 1,465,153</u>	<u>\$ (5,381,174)</u>	<u>\$ (9,855,002)</u>	<u>\$ 6,616,267</u>

E. Capital and Surplus Account

	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Capital and surplus, December 31, prior year	\$ <u>19,334,645</u>	\$ <u>18,858,378</u>	\$ <u>20,169,679</u>	\$ <u>19,128,225</u>	\$ <u>22,241,550</u>
Net income	\$ (459,083)	\$ 1,465,153	\$ (5,381,174)	\$ (9,855,002)	\$ 6,616,267
Change in net unrealized capital gains (losses)	0	447	(441)	0	0
Change in net deferred income tax	(43,018)	75,914	(235,552)	0	0
Change in non-admitted assets and related items	48,174	(211,859)	100,498	(14,387)	34,793
Change in asset valuation reserve	(22,340)	(18,354)	(24,785)	(17,286)	(24,256)
Surplus adjustments:					
Paid in	<u>0</u>	<u>0</u>	<u>4,500,000</u>	<u>13,000,000</u>	<u>0</u>
Net change in capital and surplus for the year	\$ <u>(476,267)</u>	\$ <u>1,311,301</u>	\$ <u>(1,041,454)</u>	\$ <u>3,113,325</u>	\$ <u>6,626,804</u>
Capital and surplus, December 31, current year	\$ <u>18,858,378</u>	\$ <u>20,169,679</u>	\$ <u>19,128,225</u>	\$ <u>22,241,550</u>	\$ <u>28,868,355</u>

6. SUBSEQUENT EVENTS

On May 30, 2023, Meiji Yasuda Life Insurance Company, a Japanese life insurance company (“Meiji Yasuda”), and StanCorp Financial Group, Inc., an Oregon corporation, and a wholly owned subsidiary of Meiji Yasuda submitted an acquisition application for approval from the Department, pursuant to Section 1506 of the New York Insurance Law, to acquire control of the Company. The Department approved the transaction on March 28, 2024.

7. PRIOR REPORT SUMMARY AND CONCLUSIONS

Following are the violation and recommendation contained in the prior report on examination and the subsequent actions taken by the Company in response to each citation:

<u>Item</u>	<u>Description</u>
A	<p>The examiner recommends that the Company enforce the terms of its administrative services agreement with its parent and affiliates regarding the furnishing and maintaining of the Company's books of account.</p> <p>The examiner's review indicated that the Company's books and accounts were readily available to the examiner upon request for all years during this examination.</p>
B	<p>The Company violated Section 325(a) of the New York Insurance Law by failing to keep and maintain at its principal office in New York its general ledgers for the years under examination, as well as attachments referenced in its board of director, and all committee meeting minutes.</p> <p>The examiner's review indicated that the general ledgers and attachments referenced in the board of director and all its committees' meeting minutes are readily available to the examiners upon request for all years under this examination.</p>

8. SUMMARY AND CONCLUSIONS

Following are the violations and comment contained in this report:

<u>Item</u>	<u>Description</u>	<u>Page No(s).</u>
A	The Company is not in compliance with Insurance Circular Letter No. 33 (1979) by failing to file a copy of its tax allocation agreement with this Department within 30 days of electing to participate in a consolidated tax return.	7
B	The Company violated Section 1408(b) of the New York Insurance Law by failing to obtain prior approval from the superintendent before receiving surplus contributions from its parent.	7
C	The Company violated Section 1505(c) of the New York Insurance Law by failing to obtain prior approval from the superintendent before entering with its parent into a surplus transaction that involved more than five percent of its prior year's admitted assets.	8
D	The Company violated Section 1503(a) of the New York Insurance Law by failing to amend the holding company's registration with the superintendent within thirty days following the change of its ultimate parent company's name.	8
E	The Company violated Section 4211(a) of the New York Insurance Law by failing to file a copy of the notice of election with the Superintendent at least ten days before the day of such election.	10


Respectfully submitted,



Sauhung You
Associate Insurance Examiner

STATE OF NEW YORK)
)SS:
COUNTY OF NEW YORK)

Sauhung You, being duly sworn, deposes and says that the foregoing report, subscribed by her, is true to the best of her knowledge and belief.



Sauhung You

Subscribed and sworn to before me

this 24th day of June, 2024



Audrey Hall
Notary Public, State of New York
Reg. No. 01HA0010698
Qualified in Kings County
Commission Expires 07/07/2027

APPOINTMENT NO. 32490

NEW YORK STATE

DEPARTMENT OF FINANCIAL SERVICES

*I, **ADRIENNE A. HARRIS**, Superintendent of Financial Services of the State of New York, pursuant to the provisions of the Financial Services Law and the Insurance Law, do hereby appoint:*

SAUHUNG YOU

as a proper person to examine the affairs of the
ANTHEM LIFE AND DISABILITY INSURANCE COMPANY
and to make a report to me in writing of the condition of said
COMPANY

with such other information as she shall deem requisite.

*In Witness Whereof, I have hereunto subscribed my name
and affixed the official Seal of the Department
at the City of New York*

this 2nd day of March, 2023

ADRIENNE A. HARRIS
Superintendent of Financial Services

By:

MARK MCLEOD
DEPUTY CHIEF - LIFE BUREAU

