NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES

CONSOLIDATED FINANCIAL STATEMENTS
(GAAP Basis)

December 31, 2019 and 2018

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Report of Independent Auditors

To the Board of Directors of New York Life Insurance Company:

We have audited the accompanying consolidated financial statements of New York Life Insurance Company and its subsidiaries (the "Company"), which comprise the consolidated statements of financial position as of December 31, 2019 and 2018, and the related consolidated statements of operations, of comprehensive income, of equity and of cash flows for the years then ended.

Management's Responsibility for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express an opinion on the consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, we consider internal control relevant to the Company's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of New York Life Insurance Company and its subsidiaries as of December 31, 2019 and 2018, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

PricewaterhouseCoopers LLP

New York, New York
March 12, 2020

NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION

	December 31,			
	2019		2018	
	(in millions)			
Assets				
Fixed maturities (includes $1,275 and $1,297 of securities pledged to creditors in 2019 and 2018, respectively):				
Available-for-sale, at fair value	$	204,297	$	182,620
Securities at fair value		21,645		18,858
Equity securities:				
Securities, at fair value (cost: $3,178 and $3,521 in 2019 and 2018, respectively)		3,672		3,627
Affiliated		8		10
Mortgage loans and other loans (includes $1,240 and $1,104 measured at fair value in 2019 and 2018, respectively), net of allowances		41,244		39,388
Policy loans		12,448		12,142
Other investments		20,827		18,701
Total investments		304,141		275,346
Cash and cash equivalents		5,353		6,379
Deferred policy acquisition costs		6,718		8,313
Other assets (includes $3,433 and $3,397 measured at fair value in 2019 and 2018, respectively)		11,851		12,151
Separate account assets		43,585		36,955
Total assets	$	371,648	$	339,144
Liabilities				
Future policy benefits (includes $7,818 and $7,545 measured at fair value in 2019 and 2018, respectively)	$	131,476	$	123,527
Policyholders’ account balances		123,504		119,954
Dividends payable to policyholders		1,275		1,248
Policy claims		1,261		1,368
Debt (includes $1,474 and $1,621 measured at fair value in 2019 and 2018, respectively)		7,010		5,876
Collateral received on securities lending		1,304		1,327
Other liabilities (includes $4,600 and $4,631 measured at fair value in 2019 and 2018, respectively)		14,715		11,953
Separate account liabilities		43,585		36,955
Total liabilities		324,130		302,208
Equity				
Accumulated other comprehensive income		5,230		(1,893)
Retained earnings		37,765		35,017
Total New York Life equity		42,995		33,124
Non-controlling interest		4,523		3,812
Total equity		47,518		36,936
Total liabilities and equity	$	371,648	$	339,144

The accompanying notes are an integral part of the consolidated financial statements.

NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF OPERATIONS

	Years Ended December 31,	
	2019	2018
	(in millions)	
Revenues		
Premiums	$ 16,317	$ 15,002
Fees - universal life and annuity policies	1,729	1,691
Net investment income	12,025	11,479
Net investment gains (losses):		
Other-than-temporary impairments on fixed maturities	(161)	(95)
Other-than-temporary impairments on fixed maturities recognized in accumulated other comprehensive income	32	32
All other net investment gains (losses)	3,031	(912)
Total net investment gains (losses)	2,902	(975)
Management fees and other income	1,526	1,573
Total revenues	34,499	28,770
Expenses		
Policyholder benefits	10,487	10,229
Increase in liabilities for future policy benefits	7,350	5,370
Interest credited to policyholders' account balances	3,941	2,856
Dividends to policyholders	2,009	1,962
Operating expenses	7,101	6,489
Total expenses	30,888	26,906
Income before income tax expense and non-controlling interests	3,611	1,864
Income tax expense	494	75
Net income	3,117	1,789
Less: income attributable to non-controlling interests	389	343
Net income attributable to New York Life	$ 2,728	$ 1,446

The accompanying notes are an integral part of the consolidated financial statements.

NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME

	Years Ended December 31,	
	2019	2018
	(in millions)	
Net income	$ 3,117	$ 1,789
Other comprehensive loss, net of tax:		
Foreign currency translation adjustment	(19)	(70)
Net unrealized investment gains (losses):		
Net unrealized investment gains (losses) arising during the period	8,078	(4,483)
Less: reclassification adjustment for net unrealized investment gains (losses) included in net income	68	(27)
Net unrealized investment gains (losses), net	8,010	(4,456)
Benefit plans:		
Gains (losses) and prior service costs arising during the period	(942)	228
Less: amortization of (losses) and prior service credits included in net periodic benefit costs	(74)	(131)
Benefit plans, net	(868)	359
Other comprehensive income (loss), net of tax	7,123	(4,167)
Comprehensive income (loss)	10,240	(2,378)
Less: comprehensive income attributable to non-controlling interests	389	343
Comprehensive income (loss) attributable to New York Life	$ 9,851	$ (2,721)

The accompanying notes are an integral part of the consolidated financial statements.

NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF EQUITY

	Years Ended December 31, 2019 and 2018 (in millions)				
	Accumulated Other Comprehensive Income	**Retained Earnings**	**Total New York Life Equity**	**Non-Controlling Interest**	**Total Equity**
Balance, January 1, 2018	$ 2,274	$ 33,571	$ 35,845	$ 3,501	$ 39,346
Distributions from non-controlling interests	—	—	—	212	212
Consolidation/deconsolidation of less than 100% owned entities	—	—	—	(244)	(244)
Net income	—	1,446	1,446	343	1,789
Other comprehensive income, net of tax	(4,167)	—	(4,167)	—	(4,167)
Total comprehensive income	(4,167)	1,446	(2,721)	343	(2,378)
Balance, December 31, 2018	(1,893)	35,017	33,124	3,812	36,936
Distributions from non-controlling interests	—	—	—	322	322
Consolidation/deconsolidation of less than 100% owned entities	—	—	—	—	—
Additional paid in capital from acquisition of non-controlling interests		20	20		20
Comprehensive income:					
Net income	—	2,728	2,728	389	3,117
Other comprehensive income, net of tax	7,123	—	7,123	—	7,123
Total comprehensive income	7,123	2,728	9,851	389	10,240
Balance, December 31, 2019	$ 5,230	$ 37,765	$ 42,995	$ 4,523	$ 47,518

The accompanying notes are an integral part of the consolidated financial statements.

NEW YORK LIFE INSURANCE COMPANY AND SUBSIDIARIES
CONSOLIDATED STATEMENTS OF CASH FLOWS

	Years Ended December 31, 2019	2018
	(in millions)	
Cash Flows From Operating Activities:		
Net income	$ 3,117	$ 1,789
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation and amortization	176	(40)
Net capitalization of deferred policy acquisition costs	(130)	(211)
Universal life and annuity fees	(1,153)	(1,106)
Interest credited to policyholders' account balances	3,941	2,856
Capitalized interest and dividends reinvested	(260)	(272)
Net investment (gains) losses	(2,902)	975
Equity in earnings of limited partnerships	(422)	(593)
Acquisitions of investments within consolidated investment companies	(2,767)	(2,180)
Dispositions of investments within consolidated investment companies	2,014	1,611
Other	307	162
Changes in:		
Other assets and other liabilities	(15)	(80)
Policy claims	(112)	59
Future policy benefits	7,428	5,110
Book overdrafts	(89)	145
Net cash provided by operating activities	9,133	8,225
Cash Flows From Investing Activities:		
Proceeds from:		
Sale of available-for-sale fixed maturities	4,782	6,395
Maturity and repayment of available-for-sale fixed maturities	16,315	15,527
Repayment of mortgage and other loans	7,771	7,166
Sale of other invested assets	2,559	2,568
Sale of trading securities, at fair value	3,137	3,426
Maturity and repayment of trading securities, at fair value	1,220	774
Cost of:		
Acquisition of available-for-sale fixed maturities	(30,058)	(30,859)
Acquisition of mortgage and other loans	(9,433)	(9,804)
Acquisition of other invested assets	(3,333)	(2,665)
Acquisition of trading securities, at fair value	(4,838)	(6,542)
Policy loans	(307)	(355)
Capital expenditures	(211)	(218)
Other	58	(24)
Net cash used in investing activities	(12,337)	(14,612)
Cash Flows From Financing Activities:		
Policyholders' account balances:		
Deposits	20,717	26,137
Withdrawals	(19,064)	(19,768)
Net transfers to the separate accounts	(1,058)	(310)
Contributions from non-controlling interests	1,098	879
Distributions to non-controlling interests	(776)	(667)
Proceeds from the issuance of debt	2,492	862
Paydowns from debt	(1,380)	(827)
Other	116	57
Net cash provided by financing activities	2,144	6,363
Effect of exchange rate changes on cash and cash equivalents	34	16
Net decrease in cash, cash equivalents and restricted cash	(1,026)	(8)
Cash, cash equivalents and restricted cash at the beginning of year	6,379	6,387
Cash, cash equivalents and restricted cash, end of year	$ 5,353	$ 6,379

The accompanying notes are an integral part of the consolidated financial statements.

NOTE 1 - NATURE OF OPERATIONS

New York Life Insurance Company ("New York Life"), a mutual life insurance company domiciled in New York State, and its subsidiaries ("the Company") offer a wide range of insurance and investment products and services including life insurance, annuities, long-term care, insurance pension products, disability insurance, mutual funds, securities brokerage, financial planning, trust services, capital financing, and investment advisory services. The Company offers its insurance and annuity products throughout the United States and its territories, Mexico and Canada, primarily through the Company's career agency force, but also through third party banks, brokers and independent financial advisors. The Company provides investment management and advisory services in the United States, Europe, Asia and Australia.

Pending Acquisition

On December 17, 2019, New York Life entered into a definitive agreement with Cigna Corporation and its subsidiary, Cigna Holding Company (together, "Cigna"), to acquire Cigna's group life and group disability insurance business (the "Group Business") for a purchase price of $6.3 billion, subject to adjustment. The acquisition of the Group Business will include the purchase by the Company of two insurance companies through which the Group Business is primarily conducted, Life Insurance Company of North America and Cigna Life Insurance Company of New York. The acquisition is expected to close in 2020, subject to receipt of applicable regulatory approvals and satisfaction of other customary closing conditions.

NOTE 2 - BASIS OF PRESENTATION

The accompanying consolidated financial statements have been prepared in conformity with accounting principles generally accepted in the United States of America ("GAAP") and reflect the consolidation of the parent company with the entities over which the Company exercises control, including its majority owned and controlled insurance and non-insurance subsidiaries and variable interest entities ("VIEs") in which the Company is considered the primary beneficiary. Refer to Note 3 - Significant Accounting Policies for further discussion. All intercompany transactions have been eliminated in consolidation.

The New York State Department of Financial Services (the "Department") recognizes only statutory accounting principles ("SAP") for determining and reporting the financial position and results of operations of an insurance company and for determining its solvency under New York State Insurance Law. Accounting practices used to prepare statutory financial statements for regulatory filings of life insurance companies differ in certain instances from GAAP. Refer to Note 21 - Statutory Financial Information for further discussion.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES

Use of Estimates

The preparation of the accompanying consolidated financial statements in accordance with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

The most significant estimates include those used in determining deferred policy acquisition costs ("DAC") and related amortization; measurement of goodwill and other intangible assets and any related impairment; valuation of investments including derivatives and recognition of other-than-temporary impairments ("OTTI"); future policy benefits including guarantees; pension and other postretirement benefits; provision for income taxes and valuation of deferred tax assets; and reserves for contingent liabilities, including reserves for losses in connection with unresolved legal matters.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Fair Value Option

The fair value option ("FVO") provides entities with an alternative to use fair value as the initial and subsequent accounting measurement attribute for assets and liabilities that meet the definition of a financial asset or liability. The decision to elect the FVO is determined on an instrument by instrument basis and is applied to an entire instrument. The decision is irrevocable once elected. Refer to the Fixed Maturities, Equity Securities and Mortgage Loans and Other Loans sections below and to Note 6 - Investments and Note 13 - Reinsurance for more information on the FVO.

Fixed Maturities

Fixed maturity investments classified as available-for-sale are reported at fair value. For a discussion on the valuation approach and methods for fixed maturities reported at fair value, refer to Note 9 - Fair Value Measurements. The amortized cost of fixed maturities is adjusted for amortization of premium and accretion of discount. Interest income, as well as the related amortization of premium and accretion of discount, is included in Net investment income. The Company accrues interest income on fixed maturities to the extent it is deemed collectible and the security continues to perform under its original contractual terms. In the event collectability of interest is uncertain, accrual of interest income will cease and income will be recorded when and if received.

Unrealized gains and losses on available-for-sale fixed maturity investments are reported as net unrealized investment gains (losses) in accumulated other comprehensive income (“AOCI”), net of deferred taxes and related adjustments.

Included within fixed maturity investments are mortgage-backed ("MBS") and asset-backed securities ("ABS"). Amortization of the premium or accretion of discount from the purchase of these securities considers the estimated timing and amount of cash flows of the underlying loans, including prepayment assumptions, based on data obtained from external sources or internal estimates. Projected future cash flows are updated monthly, and the amortized cost and effective yield of the securities are adjusted as necessary to reflect historical prepayment experience and changes in estimated future prepayments. For high credit quality MBS and ABS (those rated AA or above at the date of acquisition), the adjustments to amortized cost are recorded as a charge or credit to Net investment income in accordance with the retrospective method. For MBS and ABS that are not of high credit quality (those rated below AA at date of acquisition), certain floating rate securities and securities with the potential for a loss of a portion of the original investment due to contractual prepayments (i.e. interest only securities), the effective yield is adjusted prospectively for any changes in estimated cash flows.

The cost basis of fixed maturities is adjusted for impairments in value deemed to be other-than-temporary, with a loss recognized in Net investment gains (losses). The new cost basis is not adjusted for subsequent increases in estimated fair value. In periods subsequent to the recognition of an OTTI, impaired fixed maturities are accounted for as if purchased on the measurement date of the impairment. Accordingly, the discount (or reduced premium) based on the new cost basis may be accreted into net investment income in future periods based on prospective changes in cash flow estimates, to reflect adjustments to the effective yield.

Factors considered in evaluating whether a decline in the value of fixed maturities is other-than-temporary include: (1) whether the decline is substantial; (2) the duration of time that the fair value has been less than cost; and (3) the financial condition and near-term prospects of the issuer. Mortgage-backed and asset-backed securities rated below AA at acquisition are deemed other-than-temporarily impaired securities when the fair value is below amortized cost and there are negative changes in estimated future cash flows.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

With respect to fixed maturities in an unrealized loss position, an OTTI is recognized in earnings when it is anticipated that the amortized cost will not be recovered. The entire difference between the fixed maturity's cost and its fair value is recognized in earnings only when the Company either (1) has the intent to sell the fixed maturity security or (2) more likely than not will be required to sell the fixed maturity security before its anticipated recovery. If these conditions do not exist, an OTTI would be recognized in earnings ("credit loss") for the difference between the amortized cost basis of the fixed maturity and the net present value of projected future cash flows expected to be collected. The difference between the fair value and the present value of projected future cash flows expected to be collected represents the portion of OTTI related to other-than credit factors ("non-credit loss") and is recognized in AOCI. The net present value is calculated by discounting the Company's best estimate of projected future cash flows at the effective interest rate implicit in the fixed maturity prior to impairment.

The determination of cash flow estimates in the net present value calculation is subjective and methodologies will vary, depending on the type of security. The Company considers all information relevant to the collectability of the security, including past events, current conditions, and reasonably supportable assumptions and forecasts in developing the estimate of cash flows expected to be collected. This information generally includes, but may not be limited to, the remaining payment terms of the security, estimated prepayment speeds, defaults, recoveries upon liquidation of the underlying collateral securing the notes, the financial condition of the issuer(s), credit enhancements and other third-party guarantees. In addition, information such as industry analyst reports and forecasts, sector credit ratings, the financial condition of the bond insurer for insured fixed income securities, and other market data relevant to the collectability may also be considered, as well as the expected timing of the receipt of insured payments, if any. The estimated fair value of the collateral may be used to estimate the recovery value if the Company determines that the security is dependent on the liquidation of the collateral for recovery.

Fixed maturity investments classified as Securities at fair value include investments for which the FVO was elected and investments that are considered to be actively traded or held for only a short period of time. The FVO primarily includes and is generally elected for fixed income securities that support certain insurance and reinsurance contracts for which the investment results associated with these products are expected to ultimately accrue to the contract holder as well as invested assets that host embedded derivatives. Changes in fair value of the fixed maturity securities at fair value are included in Net investment gains (losses) while interest income is reported in Net investment income. The Company accrues interest income to the extent it is deemed collectible and the security continues to perform under its original contractual terms. In the event collectability of interest is uncertain, accrual of interest income will cease and income will be recorded when and if received. Cash flows from acquiring and disposing of the FVO invested assets are classified in Cash flows from investing activities. Cash flows for securities actively traded are classified in Cash flows from operating activities.

Equity Securities

Equity securities at fair value which are deemed unaffiliated are carried at fair value with changes in fair value recognized in Net investment gains (losses) while dividend income is reported in Net investment income. Included in Equity securities at fair value are certain purchases of 20% or more of the outstanding shares or units of mutual funds, trusts or similar financial instruments for which the FVO was elected. These investments have a net asset value ("NAV"), which is calculated and published on either a monthly or daily basis. For a discussion on valuation approach and methods for equity securities refer to Note 9 - Fair Value Measurements.

Affiliated equity securities represent holdings in entities where there is at least a 20% ownership and where the Company has the ability to exercise significant influence through its relationship, and are accounted for by the equity method of accounting. Accordingly, respective net earnings or losses are included in Net income.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Mortgage Loans and Other Loans

Mortgage loans, which include commercial and residential mortgage loans, are generally carried at unpaid principal balances, net of discounts, premiums, deferred origination fees, and valuation allowances, and are collateralized. For loans carried at unpaid principal balances, specific valuation allowances are established for the excess carrying value of the mortgage loan over the estimated fair value of the collateral, when it is probable that based on current information and events, the Company will be unable to collect all amounts due under the contractual terms of the loan document. The Company also has a portfolio valuation allowance for probable incurred but not specifically identified losses. The portfolio valuation allowance is determined by applying a factor against the commercial loans and a specific dollar amount for the residential mortgage loan portfolios, excluding loans for which a specific allowance has already been recorded and those reported using FVO to estimate potential losses in each portfolio. The portfolio allowance factor for the commercial mortgage loan portfolio is based on the Company's historical loss experience as well as industry data regarding commercial loan delinquency rates. The Company analyzes industry data regarding specific credit risk based on geographic locations and property types as well as probability of default, timing of default, and loss severity for each loan in a given portfolio. The portfolio allowance for the residential mortgage loan portfolio is also based on the Company's historical loss experience as well as expected defaults and loss severity of loans deemed to be delinquent. Changes to the specific and portfolio valuation allowances are reflected in Net investment gains (losses).

The Company elected the FVO for mortgage loans that support certain of the Company's reinsurance contracts for which the investment results associated with these contracts are expected to ultimately accrue to the reinsured policies. These mortgage loans are carried at fair value. The changes in the fair value of mortgage loans carried at fair value are included in Net investment gains (losses) while the interest income is reported in Net investment income. For a discussion on valuation approach and methods for mortgage loans reported at fair value, refer to Note 9 - Fair Value Measurements.

Other loans include senior secured commercial loans, issued by one of the Company's subsidiaries. Senior secured commercial loans consist of one segment of loans defined as commercial loans. Senior secured commercial loans that management has the intent and ability to hold until maturity or payoff are reported at their outstanding unpaid principal balances reduced by any charge off or loss reserve, net of any deferred fees on originated loans, or unamortized premiums or discounts on purchased loans. The Company assesses its loans on a monthly basis for collectability in light of historical experience, the nature and volume of the loan portfolio, adverse situations that may affect the borrower's ability to repay, and prevailing economic conditions. Specific loans are considered for impairment when it is probable that the Company will be unable to collect the scheduled payments of principal and interest when due according to the contractual terms of the loan document. Factors considered by management in determining impairment include payment status and the financial condition of the borrower. Impaired loan measurement may be based on the present value of expected future cash flows discounted at the loan's effective interest rate, at the loan's observable market price, or the fair value of the collateral if the loan is collateral dependent. A loss reserve is established for the calculated impairment. A portfolio valuation allowance for probable incurred but not specifically identified losses is determined for the remainder of the portfolio. These loans are assigned internal credit risk ratings and the Company utilizes a specific reserve percentage for each category of risk rating. The loss reserve rate is multiplied by outstanding loans in each related risk category to determine the portfolio reserve on these loans. Changes to the specific and portfolio valuation allowances are reflected in Net investment gains (losses).

Senior secured commercial loans that are held for sale are carried at the lower of cost net of any deferred origination costs and fees or fair value on an individual asset basis. At the time of the funding of a loan, management determines the amount of the loan that will be held-for-sale. The fair value estimates are based on negotiations with prospective purchasers (if any) or by using projected cash flows discounted at the weighted average interest rates offered in the market for similar loans. Cash flows resulting from the sale of the loans that were originally classified as held for investment are recorded as an investing activity in the accompanying Consolidated Statement of Cash Flows. When sold, the sales price received less the Company's carrying value of these loans held for sale is recorded to net gain or loss on loans sold in the accompanying Consolidated Statement of Operations.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

For mortgage loans and other loans, the Company accrues interest income on loans to the extent it is deemed collectible and the loan continues to perform under its original or restructured contractual terms. The Company places loans on non-accrual status and ceases to recognize interest income when management determines that collection of interest and repayment of principal is not probable. Any accrued but uncollected interest is reversed out of interest income once a loan is put on non-accrual status. Interest payments received on loans where interest payments have been deemed uncollectible are recognized on a cash basis and recorded as interest income. If a determination is made that the principal will not be collected, the interest payment received is used to reduce the principal balance. If a loan has investment income due and accrued that is ninety days past due, the investment income shall continue to accrue, if deemed collectible.

Mortgage and other loans are occasionally restructured in a troubled debt restructuring ("TDR"). The Company assesses loan modifications on a case-by-case basis to evaluate whether a TDR has occurred. A specific valuation allowance may be established for mortgage loans and other loans restructured in a TDR for the excess carrying value of the mortgage loan over the estimated fair value of the collateral.

The Company closely monitors mortgage loans with the potential for specific valuation allowance by considering a number of factors. For commercial mortgage loans, these factors include, but are not limited to, loan to value ("LTV"), asset performance such as debt service coverage ratio, lease rollovers, income/expense hurdles, major tenant or borrower issues, the economic climate, and catastrophic events. Residential mortgage loans that are sixty or more days delinquent are monitored for potential specific valuation allowance. For senior secured commercial loans, credit risk is managed using internal credit risk ratings, which are determined by using a combination of objective and subjective criteria.

Policy Loans

Policy loans are carried at the unpaid principal balance of the loan. Because these loans are effectively collateralized by the surrender value of the underlying policies, a valuation allowance is established only when loan balances, including capitalized interest, exceeds the related policy's cash surrender value. Interest income is recorded as earned and included in Net investment income.

Other Investments

Other investments consist primarily of direct investments in limited partnerships and limited liability companies, certain equity investments for which a measurement alternative has been elected, investments of consolidated investment companies, derivatives (see discussion on derivative instruments below), securities purchased under agreement to resell, short-term investments, real estate, and loans of certain consolidated VIEs.

Investments in limited partnerships and limited liability companies that maintain separate investor capital accounts for their investors are accounted for using the equity method of accounting unless consolidation is required. Investments in limited partnerships and limited liability companies that do not maintain separate investor capital accounts for their investors are accounted for either at fair value or under a measurement alternative if certain criteria are met or equity method accounting if the Company is deemed to have significant influence over the investee unless consolidation is required. The financial statements of equity method investees are usually not received in time for the Company to apply the equity method at each reporting period. Therefore, these investments have been recorded on a one to three-month lag. In many cases, limited partnerships and limited liability companies in which the Company invests qualify as investment companies and apply specialized accounting practices. The Company retains this specialized accounting practice in consolidation and for the equity method. For limited partnerships accounted for under the equity method, unrealized gains and losses are recorded in Net investment income. For consolidated limited partnerships, the underlying investments, which may consist of various classes of assets, are aggregated and stated at fair value in Other investments.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Certain unaffiliated equity investments that meet certain criteria are reported using a measurement alternative allowed under authoritative guidance. These are investments in corporations or limited partnerships and limited liability companies that do not maintain separate investor capital accounts and for which the Company does not have the ability to exercise significant influence. Under the measurement alternative, these investments are reported at cost less allowance, plus or minus changes resulting from observable price changes in orderly transactions for the identical or a similar investment of the same issuer. These securities are reviewed for impairment by performing a qualitative credit assessment of the investment. If the qualitative assessment indicates that the investment is impaired, fair value is calculated and an impairment loss is recognized in Net investment gains (losses) for the difference between fair value and carrying value of the investment.

Short-term investments include investments with remaining maturities of one year or less, but greater than three months, at the time of acquisition and are carried at fair value. Refer to Note 6 - Investments, for details of Other investments by component.

Real estate held for the production of income and home office properties are stated at cost less accumulated depreciation. Real estate held-for-sale is stated at the lower of cost less accumulated depreciation or fair value, less estimated costs to sell. If there is an indication that the carrying amount of the real estate may not be recoverable, then it must be tested for impairment. If the carrying amount of a real estate investment exceeds its undiscounted cash flows, an other-than-temporary impairment is recorded in Net investment gains (losses), calculated as the difference between the carrying amount of the real estate investment and the fair value of the real estate investment. Depreciation of real estate is calculated using the straight-line method over the estimated lives of the assets. Costs of permanent improvements are depreciated over their estimated useful lives. Any encumbrances on real estate are recorded in Debt.

Cash and Cash Equivalents

Cash equivalents include investments that have remaining maturities of three months or less at date of purchase and are carried at fair value.

Net Investment Income and Net Investment Gains (Losses)

Income from investments is reported within Net investment income, unless otherwise stated herein. Net investment gains (losses) include gains and losses on sales for all investments, which are generally computed using the specific identification method, as well as changes in the fair value of liabilities under the FVO. Also, as stated throughout the notes, Net investment gains and losses include impairment losses and changes in fair value of Securities, at fair value.

Derivative Instruments

Derivatives are recorded at fair value as assets, within Other investments or as liabilities, within Other liabilities, except for embedded derivatives which are recorded with the associated host contract. The classification of changes in the fair value of derivatives depends on the characteristics of the transaction, including whether it qualifies and is designated for hedge accounting. Changes in fair value for derivatives that do not qualify or are not designated for hedge accounting are included in Net investment gains (losses).

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

To qualify for hedge accounting, the hedge relationship is designated and formally documented at inception, which means any time prior to the first quarterly hedge effectiveness assessment date, by detailing the particular risk, management objective and strategy for the hedge. This includes the item and risk that is being hedged, the derivative that is being used, as well as how effectiveness is being assessed. A derivative must be highly effective in accomplishing the objective of offsetting either changes in fair value or cash flows for the risk being hedged. The hedging relationship is considered highly effective if the changes in fair value or cash flows of the hedging instrument are within 80% to 125% of the inverse changes in the fair value or cash flows of the hedged item. The Company formally assesses effectiveness of its hedging relationships both at the hedge inception and on a quarterly basis over the life of the hedge relationship in accordance with its risk management policy. The Company assesses hedge effectiveness qualitatively if (1) the initial quantitative prospective assessment demonstrates that the relationship is expected to be highly effective and (2) at inception, the Company is able to reasonably support an expectation of high effectiveness on a qualitative basis in subsequent periods. The Company continually assesses the credit standing of the derivative counterparty and, if the counterparty is deemed to be no longer creditworthy, the hedge relationship will no longer be considered effective. The Company discontinues hedge accounting prospectively if: (1) it is determined that the derivative is no longer effective in offsetting changes in the fair value or cash flows of a hedged item; (2) the derivative expired or is sold, terminated, or exercised; (3) it is probable that the forecasted transaction will not occur, or (4) management determines that designation of the derivative as a hedge instrument is no longer appropriate.

In order to mitigate counterparty credit risk, the Company receives collateral from counterparties with derivatives in a net positive fair value position, which is included in Other liabilities. The Company also posts collateral for derivatives that are in a net liability position, which is included in Other assets. Refer to Note 7 - Derivative Instruments and Risk Management.

Cash Flow Hedges

The Company accounts for the following as cash flow and foreign currency hedges, when they qualify for hedge accounting under the requirements of the authoritative guidance: (1) interest rate swaps used to convert floating rate investments to fixed rate investments; (2) foreign currency swaps used to hedge the foreign currency cash flow exposure of foreign currency denominated investments and liabilities; and (3) interest rate swaps to hedge the interest rate risk associated with forecasted transactions.

When a derivative is designated as a cash flow hedge and determined to be highly effective, changes in fair value are recorded as unrealized gains or losses in AOCI and deferred until earnings are affected by the variability of cash flows being hedged (e.g., when periodic settlements on a variable-rate asset or liability are recorded in earnings). At that time, these unrealized gains or losses are reclassified to earnings to the same line item as the associated hedged item's cash flows.

For cash flow hedges of forecasted transactions, hedge accounting is discontinued when it is probable that the forecasted transaction will not occur. In these cases, the gains and losses that were in AOCI will be recognized immediately in Net investment gains (losses) and the derivative will continue to be carried at its fair value on the balance sheet, with changes in its fair value recognized in Net investment gains (losses). When the hedged forecasted transaction is no longer probable, but is reasonably possible, the gain or loss remains in AOCI and will be recognized when the transaction affects earnings; however, prospective hedge accounting for the transaction is terminated. In all other cash flow hedge situations in which hedge accounting is discontinued, the unrealized gains or losses that were in AOCI will be recognized when the originally hedged cash flows affect earnings. Prospective changes in fair value will be recognized in Net investment gains (losses).

When a derivative is designated as a foreign currency cash flow hedge and is determined to be highly effective, changes in fair value are recorded as unrealized gains or losses in AOCI. The change in fair value of the derivative relative to the change in foreign exchange rates affect earnings in the same period as the foreign exchange transaction gains and losses on the underlying hedged item in net investment gains (losses).

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Net Investment Hedges

The change in fair value of the derivative, including any forward premium or discount, is reflected in other comprehensive income ("OCI") as part of the foreign currency translation adjustment.

Embedded Derivatives

The Company may enter into contracts that are not themselves derivative instruments but contain embedded derivatives. For each contract, the Company assesses whether the economic characteristics of the embedded derivative are clearly and closely related to those of the host contract and determines whether a separate instrument with the same terms as the embedded instrument would meet the definition of a derivative instrument. When it is determined that the embedded derivative possesses economic characteristics that are not clearly and closely related to the economic characteristics of the host contract, and that a separate instrument with the same terms would qualify as a derivative instrument, the embedded derivative is separated from the host contract and accounted for as a stand-alone derivative. Such embedded derivatives are recorded with the associated host contract at fair value and changes in their fair value are recorded in earnings. In certain instances, the Company may elect to carry the entire contract at fair value.

For further information on the Company's derivative instruments and related hedged items and their effect on the Company's financial position, financial performance, and cash flows, refer to Note 7 - Derivative Instruments and Risk Management.

Variable Interest Entities

In the normal course of its investment and investment management activities, the Company enters into relationships with various special purpose entities ("SPEs") and other entities that are deemed to be VIEs. A VIE is an entity that either (1) has equity investors that lack certain essential characteristics of a controlling financial interest (including the ability to control activities of the entity, the obligation to absorb the entity's expected losses and the right to receive the entity's expected residual returns) or (2) lacks sufficient equity to finance its own activities without financial support provided by other entities, which in turn would be expected to absorb at least some of the expected losses of the VIE.

The Company is deemed a primary beneficiary of a VIE if it has (1) the power to direct the activities of the VIE that most significantly impact the economic performance of the VIEs and (2) the obligation to absorb losses of or the right to receive benefits from the VIE that could be potentially significant to the VIE. If both conditions are present, the Company is required to consolidate the VIE.

Loaned Securities and Repurchase Agreements

The Company enters into securities lending agreements whereby certain investment securities are loaned to third parties. Securities loaned are treated as financing arrangements. With respect to securities loaned, in order to reduce the Company's risk under these transactions, the Company requires initial cash collateral equal to 102% of the fair value of domestic securities loaned. The Company records an offsetting liability for collateral received on securities lending in Other liabilities. The Company monitors the fair value of securities loaned with additional collateral obtained as necessary. The borrower of the loaned securities is permitted to sell or repledge those securities.

The Company enters into dollar roll repurchase agreements to sell and repurchase securities. Assets to be repurchased are the same, or substantially the same, as the assets transferred. Securities sold under agreements to repurchase are treated as financing arrangements. The Company agrees to sell securities at a specified price and repurchase the securities at a lower price. The Company receives cash in the amount of the sales proceeds and establishes a liability equal to the repurchase amount. The difference between the sale and repurchase amounts represents deferred income, which is earned over the life of the agreement. The liability for repurchasing the assets is included in Other liabilities.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

The Company enters into tri-party reverse repurchase agreements to purchase and resell short-term securities. Securities purchased under agreements to resell are treated as investing activities. The Company receives securities as collateral, having a fair value at least equal to 102% of the purchase price paid by the Company for the securities and the Company's designated custodian takes possession of this collateral. The Company is not permitted to sell or repledge these securities and therefore, the collateral is not recorded in the Company's financial statements. However, if the counterparty defaults, the Company would then exercise its rights with respect to the collateral, including a sale of the collateral. The fair value of the securities to be resold is monitored and additional collateral is obtained, where appropriate, to protect against credit exposure. The Company records the amount paid for securities purchased under agreements to resell in other investments.

Deferred Policy Acquisition Costs

Costs that are related directly to the successful acquisition of new and renewal insurance business are deferred as DAC. DAC primarily include commissions paid as well as a portion of employee compensation costs related to underwriting, policy issuance and processing, and medical inspection. These costs have been deferred and recorded as an asset.

For traditional participating life insurance policies, such costs are amortized over the estimated life of the contracts, in proportion to estimated gross margins. For universal life and deferred annuity contracts, such costs are amortized in proportion to estimated gross profits over the estimated life of those contracts. Annually, the Company conducts a review of valuation assumptions relative to current experience and management expectations. To the extent that expectations change as a result of this review, valuation assumptions are updated and the impact is reflected as retroactive adjustments in the current year's amortization ("unlocking") and is included in Operating expenses. The Company uses a reversion to the mean approach to derive future equity return assumptions for certain separate accounts. However, if the equity return assumption calculated pierces an established cap or floor for a sustained period of time, the long–term assumption will be unlocked and re–established. For these contracts, the carrying amount of DAC is adjusted at each balance sheet date as if the unrealized investment gains or losses had been realized and included in the gross margins or gross profits used to determine current period amortization. The increase or decrease in DAC due to unrealized investment gains or losses is recorded in AOCI.

DAC for term insurance, international non-participating traditional life insurance, group life, and long-term care contracts are amortized in proportion to premium income over the effective premium-paying period of the contract. Assumptions as to anticipated premiums are made at the date of policy issuance and are consistently applied during the life of the contract. Deviations from estimated experience are included in operating expenses when they occur. For single premium immediate annuities with life contingencies and single premium structured settlements with life contingencies, all acquisition costs are charged to expense immediately because generally all premiums are received at the inception of the contract.

The Company assesses internal replacements to determine whether such modifications significantly change the contract terms. When the modification substantially changes the contract, DAC is written-off immediately through income and only new deferrable expenses associated with the replacements are deferred. If the contract modifications do not substantially change the contract, DAC amortization on the original policy will continue and any acquisition costs associated with the related modification are expensed. DAC written-off at the date of lapse cannot be restored when a policy subsequently reinstates.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Sales Inducements

For some deferred annuity products, the Company offers policyholders a bonus equal to a specified percentage of the policyholder's initial deposit or enhanced crediting rates on certain dollar cost averaging programs, which are considered sales inducements in certain instances. For the older contracts, the embedded values of the guaranteed minimum accumulation benefits are considered sales inducements. From time to time, the Company conducts term life insurance conversion programs under which certain policyholders are offered additional premium credits, which are considered sales inducements, when converting a term life insurance policy or rider to a permanent life insurance contract. The Company defers these aforementioned sales inducements and generally amortizes them over the life of the policy using the same methodology and assumptions used to amortize DAC. Deferred sales inducements are reported in Other assets.

Future Policy Benefits

The Company's liability for Future policy benefits is mainly comprised of the present value of estimated future payments to or on behalf of policyholders, where the timing and amount of payment depends on policyholder mortality or morbidity, less the present value of future net premiums. For traditional individual participating life insurance products, the mortality assumptions applied are those used to calculate the policies' guaranteed cash surrender values. The interest rate assumptions are based on the dividend fund interest rate. For non-participating traditional life insurance, annuity, and long-term care products, expected mortality and/or morbidity, lapse and surrender are generally based on the Company's historical experience or standard industry tables including a provision for the risk of adverse deviation ("PAD"). Interest rate assumptions are based on factors such as market conditions and expected investment returns. These assumptions are established at the time the policy is issued and are intended to estimate the experience for the period the policy benefits are payable. If experience is less favorable than assumed and future losses are projected under loss recognition testing, then additional liabilities may be required, resulting in an increase in liabilities for Future policy benefits. The Company does not establish loss reserves until a loss has occurred.

Future policy benefits related to certain of the Company's reinsurance contracts are carried at fair value by election of the FVO. Refer to Note 13 - Reinsurance, for a discussion on assumed reinsurance.

The Company's liability for Future policy benefits also includes liabilities for guaranteed minimum benefits related to certain non-traditional long-duration life and annuity contracts, and deferred profit on limited pay contracts. Refer to Note 11 - Policyholders' Liabilities, for a discussion on guaranteed minimum benefits.

Policyholders' Account Balances

The Company's liability for Policyholders' account balances primarily represents the contract value that has accrued to the benefit of the policyholder as of the balance sheet date. This liability is generally equal to the accumulated account deposits, plus interest credited, less policyholder withdrawals and other charges assessed against the account balance. This liability also includes amounts that have been assessed to compensate the insurer for services to be performed over future periods, and the fair value of embedded derivatives in the above contracts.

Policyholders' account balances related to certain of the Company's reinsurance contracts are carried at fair value by election of the FVO. These amounts are dividends left on deposit. Refer to Note 13 - Reinsurance, for a discussion on assumed reinsurance.

Policyholders' account balances also include liabilities related to the Company's Medium Term Notes ("MTN") programs and are carried at amortized cost. Under these programs, a statutory trust or SPE ("the note issuers"), which are consolidated VIEs, issue MTNs to investors. The MTNs are secured by funding agreements issued to the statutory trust or special purpose entity by the Company and have payment terms substantially identical to the funding agreements. The note issuers grant a security interest in the funding agreements to the indenture trustee for the notes. In recognition of the MTN note being secured by the funding agreements, it is included in Policyholders' account balances.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Policy Claims

The Company's liability for Policy claims includes a liability for unpaid claims. Unpaid claims include estimates of claims that the Company believes have been incurred, but have not yet been reported as of the balance sheet date. Policy claims related to certain of the Company's reinsurance contracts are carried at fair value by the election of the FVO. Refer to Note 13 - Reinsurance, for a discussion on assumed reinsurance.

Debt

Short-term and long-term debt is carried at unpaid principal balance, net of any unamortized discount or premium and debt issuance costs and is included in Other liabilities. Original-issue discount or premium and debt issuance costs are recognized as a component of interest expense over the period the debt is expected to be outstanding, using the interest method of amortization. Short-term debt is debt maturing in one year or less. Refer to Note 9 - Fair Value Measurements, for discussion on the fair value of debt.

Separate Account Assets and Liabilities

The Company has separate accounts, some of which are registered with the U.S. Securities and Exchange Commission ("SEC"). The Company reports separately, as Separate account assets and Separate account liabilities, investments held in separate accounts and liabilities of the separate accounts if (1) such separate accounts are legally recognized; (2) assets supporting the contract liabilities are legally insulated from the Company's general account liabilities; (3) investments are directed by the contractholder or in accordance with specific investment objectives; and (4) all investment performance, net of contract fees and assessments, is passed through to the contractholder. The separate accounts have varying investment objectives, are segregated from the Company's general account and are maintained for the benefit of separate account policyholders. Investment risks associated with market value changes are borne by the policyholders, except to the extent of minimum guarantees made by the Company with respect to certain accounts. All separate account assets are stated at fair value. The separate account liabilities represent the policyholders' interest in the account, and include accumulated net investment income and realized and unrealized gains and losses on the assets.

Contingencies

Amounts related to contingencies are accrued if it is probable that a liability has been incurred and an amount is reasonably estimable.

Benefit Plans

New York Life maintains various tax-qualified and non-qualified plans that provide defined benefit pension and other postretirement benefits covering eligible U.S. employees and agents. A December 31^{st} measurement date is used for all defined benefit pension and other postretirement benefit plans.

The Company recognizes the funded status of each of the pension and other postretirement plans in Other assets or Other liabilities in the accompanying Consolidated Statements of Financial Position. The funded status is measured as the difference between plan assets at fair value and projected benefit obligation ("PBO") for pension plans or the accumulated postretirement benefit obligations ("APBO") for other postretirement plans.

The PBO is defined as the actuarially calculated present value of vested and non-vested pension benefits accrued based on service accruals through the measurement date and anticipated future compensation levels. It is the basis upon which pension liabilities and net periodic pension benefit cost are determined. The PBO of the defined benefit pension plans is determined using a variety of actuarial assumptions, from which actual results may vary.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

The APBO represents the actuarial present value of other postretirement benefits attributed to employee services rendered through the measurement date. This is the valuation basis upon which postretirement liabilities and net periodic postretirement benefit cost are determined. The APBO is determined using a variety of actuarial assumptions, from which actual results may vary.

For pension and other postretirement benefits, New York Life recognizes the net periodic benefit cost as an expense in the accompanying Consolidated Statements of Operations.

Net periodic benefit cost is determined using management estimates and actuarial assumptions to derive service cost, interest cost, and expected return on plan assets for a particular year. Net periodic benefit cost also includes the applicable amortization of any prior service cost (credit) arising from the increase (decrease) in prior years' benefit costs due to plan amendments. These costs are amortized into net periodic benefit cost over the expected service years of employees whose benefits are affected by such plan amendments. Actual experience related to plan assets and/or the benefit obligation may differ from that originally assumed when determining net periodic benefit cost for a particular period and future assumptions may change, resulting in gains or losses. To the extent such aggregate gains or losses exceed 10 percent of the greater of the benefit obligation or the market-related asset value of the plan, they are amortized into net periodic benefit cost over the expected service years of employees expected to receive benefits under the plans.

The obligations and expenses associated with these plans require an extensive use of assumptions such as the discount rate, expected rate of return on plan assets, rate of future compensation increases, healthcare cost trend rates, as well as assumptions regarding participant demographics such as rates and age at retirement, withdrawal rates, and mortality. Management, in consultation with its external actuarial consulting firm, determines these assumptions based upon a variety of factors such as historical performance of the plan and its assets, currently available market and industry data, and expected benefit payout streams. The assumptions used may differ materially from actual results due to, among other factors, changing market and economic conditions and changes in participant demographics.

New York Life also sponsors tax-qualified defined contribution plans for substantially all U.S. employees and agents. The defined contribution plan for employees matches a portion of employees' contributions. Accordingly, the Company recognizes compensation costs for current matching contributions. The defined contribution plan for agents provides for discretionary Company contributions for eligible agents. Accordingly, the Company recognizes compensation costs for current discretionary contributions. As all contributions are transferred currently to the trust for these plans, no liability for matching or discretionary contributions is recognized.

New York Life also maintains, for certain eligible participants, a non-qualified unfunded arrangement that credits deferral amounts and matching contributions with respect to compensation in excess of the amount that may be taken into account under the tax-qualified defined contribution plan because of applicable Internal Revenue Service ("IRS") limits. Accordingly, the Company recognizes compensation costs for current matching contributions and holds a liability for these benefits, which is included in Other liabilities.

New York Life provides certain benefits to eligible employees and agents during employment for paid absences, and after employment but before retirement. A liability for these benefits is accrued when the benefit is incurred.

Other Assets

Other assets primarily consist of amounts receivable for undelivered securities, furniture and equipment, investment income due and accrued, capitalized software and web development costs, reinsurance recoverables, suspense and clearing, current taxes receivable, sales inducements, goodwill, intangible assets, and trade receivables.

Furniture and equipment is stated at cost less accumulated depreciation. Depreciation is determined using the straight-line method over the estimated useful lives of the related assets, which generally ranges from three to ten years.

Capitalized external and internal software and web development costs are amortized on a straight-line basis over the estimated useful life of the software, generally not to exceed five years.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Goodwill and other intangible assets with an indefinite useful life are not required to be amortized. However, effective January 1, 2019, the Company has elected a private company alternative which allows the Company to amortize goodwill on a straight-line basis over 10 years or less than 10 years if the Company demonstrates that another useful life is more appropriate. The Company's goodwill (including goodwill recorded at December 31, 2018) is amortized prospectively over a period of 10 years beginning January 1, 2019. All indefinite-lived intangible assets are required to be tested for impairment at least annually. The Company has an option to perform the impairment analysis quantitatively or qualitatively, when certain criteria is met. Refer to Note 15 - Goodwill and Other Intangible Assets for additional information on goodwill and other intangible assets.

If, after qualitatively assessing the events or circumstances, it is determined that more likely than not the fair value of a reporting unit is less than its carrying amount then the quantitative analysis is performed. If, however the Company concludes otherwise, then no further analysis is deemed necessary.

The quantitative goodwill impairment test is performed at the consolidated entity level by comparing the fair value to its carrying value including goodwill. If the fair value exceeds its carrying value, the applicable goodwill is considered not to be impaired. If the carrying value exceeds fair value, an impairment charge is recorded for the excess. However, the loss recognized should not exceed the total amount of goodwill. Additionally, for any subsidiaries for which goodwill has been pushed down to the acquiree, the Company will consider whether local impairment triggers exist, which could result in an impairment in the subsidiaries separate company financial statements. Subsequent reversal of goodwill impairment losses is not permitted. However, goodwill that has been impaired at the subsidiary level will be re-established in the parent company's financial statements if no impairment exist at that higher level.

Indefinite-lived intangible assets, other than goodwill, also follow the qualitative and/or the quantitative analysis for impairment by comparing the fair value of the asset with its carrying amount. If the carrying amount of the intangible asset exceeds its fair value, an impairment loss is recognized in the amount of that excess.

An intangible asset with a finite life is amortized over its useful life. Intangible assets with finite useful lives are tested for impairment when facts and circumstances indicate that the carrying amount may not be recoverable, and an impairment loss is recognized when the carrying amount of an asset exceeds the estimated undiscounted cash flows attributable to the asset. The amount of the impairment loss to be recorded is calculated by the excess of the asset's carrying value over its fair value. Fair value is generally determined using discounted cash flow analysis using assumptions that a market participant would use.

Other Liabilities

Other liabilities consist primarily of reinsurance payables, which is mainly comprised of funds-withheld payable by the Company in accordance with the terms of certain reinsurance ceded contracts, payables resulting from purchases of securities that had not yet settled at the balance sheet date, derivative liabilities, claim adjustment expenses, accrued expenses, employee benefit liabilities, net deferred tax liabilities, and current tax liabilities.

Reinsurance recoverables and payables related to certain of the Company's reinsurance contracts are carried at fair value by election of the FVO.

Fair Value Measurements

For fair values of various assets and liabilities, refer to Note 9 - Fair Value Measurements.

Foreign Currency Translation Adjustments

Assets and liabilities of entities with their functional currency denominated in foreign currencies have been translated into U.S. dollars at the respective year-end exchange rates. Operating results are translated monthly at the average exchange rates for that month. Foreign currency translation gains and losses are credited or charged directly to the cumulative translation adjustment ("CTA") account in AOCI net of applicable tax. The change in the CTA account includes the current year effect of the translation adjustment. CTA is reclassified from AOCI to Net investment gains

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

(losses) on the accompanying Consolidated Statements of Operations upon the sale or complete or substantially complete liquidation of the Company's investment in the foreign entity. Foreign currency transaction gains and losses are included in Net investment gains (losses) in the accompanying Consolidated Statements of Operations.

Recognition of Insurance Income and Related Expenses

Premiums from traditional participating life insurance policies, term life policies, long-term care and annuity contracts with life contingencies are recognized as revenue when due. The associated benefits and expenses are matched with revenue so as to result in the recognition of profits over the life of the policies/contracts. This match is accomplished by providing liabilities for future policy benefits (refer to Note 11 - Policyholders' Liabilities) and the deferral and subsequent amortization of DAC. Premiums from group life policies are recognized as revenue over the contract period.

Amounts received under universal life-type contracts and investment contracts are reported as deposits to Policyholder's account balances as discussed in Note 11 - Policyholders' Liabilities. Revenues from these contracts consist of amounts assessed during the period for mortality and expense risk, policy administration and surrender charges, and are included in Fees – universal life and annuity policies. In addition to fees, the Company earns investment income from the investment of policyholders' deposits in the Company's general account portfolio. The Company establishes an unearned revenue liability for amounts previously assessed to compensate the Company for services to be performed over future periods. These amounts are deferred and recognized into income over the period benefited, using the same assumptions and factors used to amortize DAC. Policy benefits and claims that are charged to expense include benefit claims incurred in the period in excess of related policyholders' account balances.

Premiums for contracts with a single premium or a limited number of premium payments due over a significantly shorter period than the total period over which benefits are provided are recorded as income when due. Any excess profit is deferred and recognized as income in a constant relationship to insurance in-force and, for annuities, in relation to the amount of expected future benefit payments.

Premiums, universal life fee income, benefits and expenses are stated net of reinsurance ceded. Estimated reinsurance ceding allowances are recognized over the life of the reinsured policies using assumptions consistent with those used to account for the underlying policies. Refer to Note 13 - Reinsurance for a discussion on reinsurance.

Management Fees

The Company receives fees for investment management advisory services and performance fees for services provided under agreements with its clients. Management fees also includes revenue from the distribution of mutual funds. The consideration received for these services is substantially all variable and the Company records the revenue when the contractual terms of the fee arrangement have been satisfied and it is probable that a significant reversal in the amount of the fee will not occur. These fees are included in Management fees and other income.

Dividends Payable to Policyholders

The amount of dividends to be paid to New York Life participating policyholders is determined annually by New York Life's Board of Directors. The aggregate amount of policyholders' dividends is based on New York Life's statutory results and past experience, including investment income, net realized investment gains and losses over a number of years, mortality experience, and other factors. New York Life accrues dividends to policyholders when they are due to the policyholder.

Dividends payable to policyholders related to certain of the Company's reinsurance contracts are carried at fair value by election of the FVO. Refer to Note 13 - Reinsurance, for a discussion on assumed reinsurance.

NOTE 3 - SIGNIFICANT ACCOUNTING POLICIES (continued)

Federal Income Taxes

Current federal income taxes are charged or credited to operations based upon amounts estimated to be payable or recoverable as a result of taxable operations for the current year and any adjustments to such estimates from prior years. Deferred federal income tax assets and liabilities are recognized for expected future tax consequences of temporary differences between GAAP and taxable income. Temporary differences are identified and measured using a balance sheet approach whereby GAAP and tax balance sheets are compared to each other. Deferred income taxes are generally recognized based on enacted tax rates and a valuation allowance is recorded if it is more likely than not that any portion of the deferred tax asset will not be realized.

Authoritative guidance requires an evaluation of the recoverability of deferred tax assets and the establishment of a valuation allowance, if necessary, to reduce the deferred tax asset to an amount that is more likely than not to be realized. Considerable judgment is required in determining whether a valuation allowance is necessary, and if so, the amount of such valuation allowance. In evaluating the need for a valuation allowance many factors are considered, including: (1) the nature of deferred tax assets and liabilities; (2) whether they are ordinary or capital; (3) in which tax jurisdictions they were generated and the timing of their reversal; (4) taxable income in prior carry-back years as well as projected taxable earnings exclusive of reversing temporary differences and carryforwards; (5) the length of time that carryovers can be utilized in the various tax jurisdictions; (6) any unique tax rules that would impact the utilization of the deferred tax assets; and (7) any tax planning strategies the Company would employ to avoid a tax benefit from expiring unused.

On December 22, 2017, the Tax Cuts and Jobs Act (“TCJA”) was signed into law, making significant changes to the U.S. Internal Revenue Code ("IRC"). In addition, the SEC staff issued Staff Accounting Bulletin 118, Income Tax Accounting Implications of the Tax Cuts and Jobs Act (“SAB 118”), which allows registrants to record provisional amounts during a measurement period not to extend beyond one year. See Note 17 - Income Taxes for additional information on the TCJA and the SAB 118 provisional amounts.

New York Life files a consolidated federal income tax return with all domestic insurers and certain non-insurance subsidiaries. The consolidated income tax provision or benefit is allocated among the members of the group in accordance with a tax allocation agreement. The tax allocation agreement provides that each member of the group computes its share of the consolidated tax provision or benefit, in general, on a separate company basis, and may, where applicable, include the tax benefits of operating or capital losses utilizable in New York Life's consolidated returns. Intercompany tax balances are generally settled quarterly on an estimated basis with a final settlement within 30 days of the filing of the consolidated return. Current federal income taxes are charged or credited to operations based upon amounts estimated to be payable or recoverable as a result of taxable operations for the current year and any adjustments to such estimates from prior years.

The Company’s foreign affiliates operating outside the United States of America compute their tax provision and file on a separate return basis, in accordance with the applicable foreign tax statutes prevailing in the country in which they are deemed a resident for tax purposes.

In accordance with the authoritative guidance related to income taxes, the Company determines whether it is more likely than not that a tax position will be sustained upon examination by the appropriate taxing authorities before any part of the benefit can be recorded in the financial statements. The amount of tax benefit recognized for an uncertain tax position is the largest amount of benefit that is greater than 50 percent likely of being realized upon settlement. Unrecognized tax benefits are included in Other liabilities and are charged to earnings in the period that such determination is made. The Company classifies interest and penalties related to tax uncertainties as Income tax expense.

NOTE 4 - BUSINESS RISKS AND UNCERTAINTIES

The Company is exposed to an array of risks, including, but not limited to, regulatory actions, financial risk, risks associated with its investments and operational risk, including cyber security.

The Company is regulated by the insurance departments of the states and territories where it is licensed to do business. Although the federal government does not directly regulate the business of insurance, federal legislation and administrative policies can significantly and adversely affect the insurance industry and the Company. The Company is unable to predict whether any administrative or legislative proposals, at either the federal or state level, will be adopted in the future, or the effect, if any, such proposals would have on the Company.

The Company's insurance liabilities and assets under management are exposed to market risk, policyholder behavior risk and mortality/longevity risk. Market volatility and other equity market conditions may affect the Company’s exposure to risks related to guaranteed death benefits and guaranteed living benefits on variable annuity and certain variable universal life products. Furthermore, the level of sales of the Company’s insurance and investment products is influenced by many factors, including general market rates of interest, the strength, weakness and volatility of equity markets, and terms and conditions of competing products.

The Company is exposed to the risks normally associated with an investment portfolio, which include interest rate, liquidity, credit and counterparty risks. The Company controls its exposure to these risks by, among other things, closely monitoring and managing the duration and cash flows of its assets and liabilities, maintaining a large percentage of its portfolio in highly liquid securities, engaging in a disciplined process of underwriting, reviewing and monitoring credit risk, and by devoting significant resources to develop and periodically update its risk management policies and procedures.

The Company relies on technology systems and solutions to conduct business and to retain, store, protect, and manage confidential information. The failure of the Company’s technology systems and solutions, or those of a vendor, for any reason has the potential to disrupt its operations, result in the loss of customer business, damage the Company’s reputation, and expose the Company to litigation and regulatory action, all of which could adversely impact its profitability.

NOTE 5 - RECENT ACCOUNTING PRONOUNCEMENTS

Adoption of New Accounting Pronouncements

In May 2014, the FASB issued updated guidance on accounting for revenue recognition, which supersedes most existing revenue recognition guidance. The standard excludes from its scope the accounting for insurance contracts, leases, financial instruments, and other agreements that are governed under other GAAP guidance. The new guidance primarily affects revenue recognition policies pertaining to the Company’s investment management business. This revenue is classified within the Management fees and other income line item in the accompanying Consolidated Statements of Operations. The guidance requires an entity to recognize revenue upon the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled to, in exchange for those goods or services. The Company adopted the guidance on its required effective date of January 1, 2018 using a modified retrospective approach. There was no material financial impact to the financial statements at the date of adoption.

NOTE 5 - RECENT ACCOUNTING PRONOUNCEMENTS (continued)

In January 2016, the FASB issued updated guidance that changes the rules regarding recognition and measurement of financial assets and financial liabilities. The new guidance requires all equity securities (except those accounted for under the equity method of accounting, or those that result in consolidation of the investee), to be reported at fair value with changes in fair value recognized in income, thereby eliminating previous classification of equity securities between trading or available-for-sale. The new guidance allows companies to elect a measurement alternative for certain equity investments without a readily determinable fair value. The new guidance also requires the change in fair value of liabilities for which the FVO has been elected to be bifurcated between OCI and income whereas previously the entire change in fair value was recognized in income. The Company adopted this guidance on its required effective date of January 1, 2018 using a modified retrospective approach with a cumulative effect adjustment to retained earnings at the date of adoption. Adoption of this guidance increased retained earnings by $51 million after tax and decreased AOCI by $45 million after tax.

In February 2017, the FASB issued updated guidance on partial sales of and derecognition of non-financial assets. The guidance clarifies when and how to apply ASC 610-20, Other Income, by defining “in substance non-financial assets,” unifying guidance related to partial sales of non-financial assets, and eliminating rules specifically addressing sales of real estate. When an entity transfers its controlling interest in a non-financial asset, but retains a non-controlling ownership interest, the entity will measure the retained interest at fair value. This results in full gain/loss recognition upon the sale of a controlling interest in a non-financial asset. Previous guidance generally prohibited gain recognition on the retained interest. The new guidance was effective on January 1, 2018 and was applied on a retrospective basis. Adoption of this guidance increased retained earnings by $43 million after tax.

In August 2017, the FASB issued updated guidance on accounting for hedging activities with an objective to better align an entity’s risk management activities and financial reporting for hedging relationships through changes to both the designation and measurement guidance for qualifying hedging relationships and the presentation of hedge results. The amendments expand and refine hedge accounting for both non-financial and financial risk components and align the recognition and presentation of the effects of the hedging instrument and the hedged item in the financial statements. The Company early adopted this guidance on January 1, 2019. The adoption of this guidance did not have a material impact on the Company's consolidated financial statements.

In 2014, the FASB issued guidance on alternative accounting treatments of goodwill and intangible assets for private companies. These alternatives are optional electives that can be adopted anytime as a policy election for non-public entities. The alternative treatment of goodwill allows companies, on a prospective basis, to amortize current and future goodwill balances on a straight-line basis over a period of time not to exceed 10 years. The alternative treatment of intangible assets allows companies, on a prospective basis for transactions that occur subsequent to the adoption of this alternative, to subsume certain qualifying intangible assets into the goodwill balance at the acquisition date of a business combination and accounted for as goodwill subsequent to the acquisition date. The Company elected to adopt this private company alternative guidance on January 1, 2019. There was no impact on the Company's consolidated financial statements on the date of adoption, due to prospective adoption.

Future Adoption of New Accounting Pronouncements

In February 2016, the FASB issued updated guidance on accounting for leases which requires lessees to recognize almost all leases on the balance sheet as a right-of-use asset and a lease liability. For leases with a term of 12 months or less, a lessee is permitted to make an accounting policy election not to recognize lease assets and lease liabilities rather to recognize lease expense on a straight-line basis over the term of the lease. The recognition, measurement, and presentation of expenses and cash flows arising from a lease have not significantly changed. Also, fundamental changes were not made to the lessor accounting. In 2019, the FASB deferred the effective date of this guidance for non-public entities. The Company plans to adopt the guidance on its required effective date for non-public entities of January 1, 2021 using a modified retrospective approach. The adoption of this guidance is not expected to have a significant impact on the Company's equity or net income.

NOTE 5 - RECENT ACCOUNTING PRONOUNCEMENTS (continued)

In June 2016, the FASB issued updated guidance for recognizing credit losses on certain financial instruments based on an estimate of current expected credit losses. Entities will be required to estimate lifetime expected credit losses based on an asset's amortized cost that reflects losses expected over the remaining contractual life of an asset. The estimate of expected credit losses should consider historical information, current information, and reasonable and supportable forecasts of future events and circumstances, as well as estimates of prepayments. This includes the risk of loss, even when that risk is remote. The guidance also modifies existing other-than-temporary impairment guidance for available-for-sale debt securities to require the use of an allowance rather than a direct write down of the investment, and replaces existing guidance for purchased credit deteriorated loans and debt securities. In 2019, the FASB deferred the effective date of this guidance for non-public entities until January 1, 2023. The Company plans to adopt the guidance on its required effective date for non-public entities of January 1, 2023 using a modified retrospective approach. The Company is currently assessing the impact of this guidance on its consolidated financial statements.

In August 2018, the FASB issued updated guidance for the recognition, measurement, presentation, and disclosure requirements for long-duration contracts issued by an insurance entity. The guidance requires insurance entities to update, on retrospective basis, the assumptions used to measure the liability for future policy benefits for traditional and limited-payment contracts at least annually with the changes recognized through net income. This includes use of an upper-medium grade (low-credit-risk) fixed income discount rate that is required to be updated quarterly with changes recorded through accumulated other comprehensive income. The updated guidance also changes the amortization method of deferred acquisition costs and the measurement of market risk benefits. The guidance significantly impacts the accounting for the traditional and limited-pay contracts. In 2019, the FASB deferred the effective date of this guidance. The Company plans to adopt this guidance on its required effective date for non-public entities of January 1, 2024. Currently an assessment of the impact is being performed with an expectation that the updated guidance will have a significant impact on the Company's financial statements.

NOTE 6 – INVESTMENTS

Fixed Maturities

The amortized cost and estimated fair value of fixed maturities available-for-sale at December 31, 2019 and 2018, by contractual maturity, is presented below (in millions). Expected maturities may differ from contractual maturities because issuers may have the right to call or repay obligations with or without call or prepayment penalties.

	2019		2018	
	Amortized Cost	Fair Value	Amortized Cost	Fair Value
Fixed maturities available-for-sale				
Due in one year or less	$ 6,886	$ 6,953	$ 6,177	$ 6,180
Due after one year through five years	40,545	41,965	38,768	38,768
Due after five years through ten years	39,602	42,288	39,446	38,762
Due after ten years	43,017	49,903	38,813	40,786
Mortgage-backed and asset-backed securities:	60,769	63,188	58,202	58,124
Total fixed maturities available-for-sale	$ 190,819	$ 204,297	$ 181,406	$ 182,620

NOTE 6 - INVESTMENTS (continued)

At December 31, 2019 and 2018, the distribution of gross unrealized gains and losses on investments in fixed maturities were as follows (in millions):

	2019				
	Amortized Cost	Unrealized Gains	Unrealized Losses	Fair Value	OTTI in AOCI[1]
Fixed maturities available-for-sale					
U.S. Treasury	$ 2,067	$ 440	$ 8	$ 2,499	$ —
U.S. government corporations & agencies	5,636	861	—	6,497	—
U.S. agency MBS and ABS	29,806	1,750	63	31,493	—
Foreign governments	3,781	501	17	4,265	—
U.S. corporate	98,190	8,182	132	106,240	(1)
Foreign corporate	20,376	1,299	67	21,608	—
Non-agency RMBS	2,290	114	12	2,392	(1)
Non-agency CMBS	13,877	436	16	14,297	—
Non-agency ABS[2]	14,796	255	45	15,006	—
Total fixed maturities available-for-sale	$ 190,819	$ 13,838	$ 360	$ 204,297	$ (2)

	2018				
	Amortized Cost	Unrealized Gains	Unrealized Losses	Fair Value	OTTI in AOCI[1]
Fixed maturities available-for-sale					
U.S. Treasury	$ 1,631	$ 301	$ 14	$ 1,918	$ —
U.S. government corporations & agencies	6,416	706	14	7,108	—
U.S. agency MBS and ABS	29,737	747	623	29,862	—
Foreign governments	3,498	224	73	3,649	—
U.S. corporate	91,398	2,672	2,346	91,723	(3)
Foreign corporate	20,261	371	534	20,098	—
Non-agency RMBS	2,216	100	24	2,292	(4)
Non-agency CMBS	12,319	59	253	12,125	—
Non-agency ABS[2]	13,930	105	191	13,845	(1)
Total fixed maturities available-for-sale	$ 181,406	$ 5,285	$ 4,072	$ 182,620	$ (8)

(1) Represents the amount of OTTI losses in AOCI, which were not included in earnings pursuant to authoritative guidance. Amount excludes $148 million and $125 million for the years ended December 31, 2019 and 2018, respectively, of gross unrealized gains on impaired securities relating to changes in the value of such securities subsequent to the impairment measurement date.
(2) Includes auto loans, credit cards, education loans, and other asset types.

At December 31, 2019 and 2018, the Company had outstanding contractual obligations to acquire additional private placement securities for $1,760 million and $1,797 million, respectively.

NOTE 6 - INVESTMENTS (continued)

Mortgage Loans and Other Loans

The Company's mortgage loans and other loans portfolio net of allowance for credit losses includes the following (in millions):

	2019	2018
Mortgage loans:		
Commercial mortgage loans	$ 35,131	$ 33,574
Residential mortgage loans	18	29
Total mortgage loans	35,149	33,603
Other loans:		
Senior secured commercial loans, at amortized cost	6,153	5,603
Senior secured commercial loans held for sale	145	329
Total other loans	6,298	5,932
Total mortgage loans and other loans, gross of allowance for credit losses	41,447	39,535
Allowance for credit losses	(203)	(147)
Total mortgage loans and other loans, net of allowance for credit losses	$ 41,244	$ 39,388

The Company's mortgage loan investments are diversified by property type, location and borrower and are collateralized by the related properties.

At December 31, 2019 and 2018, contractual commitments to extend credit under mortgage loan agreements were $2,846 million and $2,684 million, respectively, at fixed and floating interest rates ranging from 2.80% to 11.50% in 2019 and from 2.80% to 12.25% in 2018. These commitments are diversified by property type and geographic region.

At December 31, 2019 and 2018, the distribution of the mortgage loan portfolio by property type and geographic region is as follows ($ in millions):

	2019		2018	
	Amount	% of Total	Amount	% of Total
Property type				
Apartment buildings	$ 11,887	33.8%	$ 10,902	32.4%
Office buildings	9,974	28.4	9,819	29.2
Retail facilities	7,053	20.1	7,274	21.6
Industrial	5,544	15.8	5,122	15.2
Hotel/motel	567	1.6	446	1.3
Residential	18	0.1	29	0.1
Other	106	0.3	11	—
Total mortgage loans	35,149	100.0%	33,603	100.0%
Allowance for credit losses	(96)		(65)	
Total net mortgage loans	$ 35,053		$ 33,538	

	2019		2018	
	Amount	% of Total	Amount	% of Total
Geographic region				
Central	$ 9,150	26.0%	$ 8,178	24.3%
South Atlantic	8,237	23.4	8,793	26.2
Middle Atlactic	7,754	22.1	6,569	19.5
Pacific	7,299	20.8	7,315	21.8
New England	2,550	7.3	2,599	7.7
Other	159	0.5	149	0.4
Total mortgage loans	35,149	100.0%	33,603	100.0%
Allowance for credit losses	(96)		(65)	
Total net mortgage loans	$ 35,053		$ 33,538	

NOTE 6 - INVESTMENTS (continued)

Fair value of the collateral for commercial mortgages (excluding credit loans) over $5 million is updated every three years unless a more current appraisal is warranted. Commercial mortgages less than $5 million have an on-site inspection performed by an external inspection service every three years as well. If the loan is determined to be troubled, the loan is more frequently monitored as to its status. LTV, which is based on collateral values, is deemed as one of the key mortgage loan indicators to assess credit quality and to assist in identifying problem loans.

At December 31, 2019 and 2018, LTVs on the Company's mortgage loans, based upon the recorded investment gross of allowance for credit losses, were as follows (in millions):

	2019							
LTV Ratio	Apartment Buildings	Office Buildings	Retail Facilities	Industrial	Hotel/ Motel	Residential	Other	Total
Above 95%	$ —	$ —	$ 249	$ —	$ —	$ —	$ —	$ 249
91% to 95%	—	—	—	—	—	—	—	—
81% to 90%	—	17	—	—	—	—	—	17
71% to 80%	1,319	335	68	—	—	—	—	1,722
Below 70%	10,568	9,622	6,736	5,544	567	18	106	33,161
Total	$ 11,887	$ 9,974	$ 7,053	$ 5,544	$ 567	$ 18	$ 106	$ 35,149

	2018							
LTV Ratio	Apartment Buildings	Office Buildings	Retail Facilities	Industrial	Hotel/ Motel	Residential	Other	Total
Above 95%	$ —	$ —	$ —	$ —	$ —	$ —	$ —	$ —
91% to 95%	—	—	—	—	—	—	—	—
81% to 90%	—	149	—	—	—	—	—	149
71% to 80%	1,174	—	295	—	—	4	—	1,473
Below 70%	9,728	9,670	6,979	5,122	446	25	11	31,981
Total	$ 10,902	$ 9,819	$ 7,274	$ 5,122	$ 446	$ 29	$ 11	$ 33,603

There were impaired mortgage loans with a valuation allowance of $29 million at December 31, 2019 and no valuation allowance at December 31, 2018. The Company had $1 million and $3 million in impaired loans without a related valuation allowance at December 31, 2019 and 2018, respectively.

Investments in mortgage loans that have been non-income producing for the last twelve months totaled $1 million and $3 million at December 31, 2019 and 2018, respectively. There were no mortgage loans acquired for the year ended December 31, 2019 and 2018, other than through direct origination.

The Company has investments in mortgage loans for which it elected the FVO. The contractual principal amount of mortgage loans for which the FVO has been elected was $1,203 million and $1,100 million, at December 31, 2019 and 2018, respectively. During 2019 and 2018, respectively, the Company recorded a $41 million and $18 million gain related to fair value changes of the investment, which is reported in Net investment gains (losses) in the accompanying Consolidated Statements of Operations.

NOTE 6 - INVESTMENTS (continued)

The Company monitors the aging of its mortgage loans and senior secured commercial loans at amortized cost on a monthly basis to determine delinquencies. The following table presents an aging of past due mortgage loans and other loans based upon the recorded investment gross of allowance for credit losses, as well as the amount of loans in non-accrual status at December 31, 2019 and 2018 (in millions):

	2019						
	Current	30-59 Days Past Due	60-89 Days Past Due	90 Days or More Past Due	Total Past Due	Total Loans	Non-Accrual Status
Residential mortgage loans	$ 17	$ —	$ —	$ 1	$ 1	$ 18	$ 1
Commercial mortgage loans	35,131	—	—	—	—	35,131	—
Senior secured commercial loans, at amortized cost	6,042	—	—	111	111	6,153	167
Total	$ 41,190	$ —	$ —	$ 112	$ 112	$ 41,302	$ 168

	2018						
	Current	30-59 Days Past Due	60-89 Days Past Due	90 Days or More Past Due	Total Past Due	Total Loans	Non-Accrual Status
Residential mortgage loans	$ 26	$ —	$ —	$ 3	$ 3	$ 29	$ 3
Commercial mortgage loans	33,575	—	—	—	—	33,575	—
Senior secured commercial loans, at amortized cost	5,529	1	—	73	74	5,603	100
Total	$ 39,130	$ 1	$ —	$ 76	$ 77	$39,207	$ 103

The Company establishes a specific reserve when it is probable that the Company will be unable to collect all amounts due under the contractual terms of the loan documents, and a portfolio reserve for probable incurred but not specifically identified losses.

NOTE 6 - INVESTMENTS (continued)

The following table presents the activity in the allowance for credit losses for mortgage loans and senior secured commercial loans at amortized cost for the years ended December 31, 2019 and 2018 (in millions):

	2019				2018			
Allowance for Credit Losses	**Residential Mortgage Loans**	**Commercial Mortgage Loans**	**Senior Secured Commercial Loans**	**Total**	**Residential Mortgage Loans**	**Commercial Mortgage Loans**	**Senior Secured Commercial Loans**	**Total**
Beginning of year	$ 2	$ 63	$ 81	$ 146	$ 2	$ 58	$ 83	$ 143
Deconsolidation	—	—	—	—	—	—	—	—
Charged-off loans	—	—	—	—	—	—	(55)	(55)
Provision for credit losses	—	32	25	57	—	5	52	57
Recoveries	—	—	—	—	—	—	1	1
End of year	$ 2	$ 95	$ 106	$ 203	$ 2	$ 63	$ 81	$ 146
Allowance, for credit losses:								
Individually evaluated for impairment (specific)	$ —	$ 29	$ 70	$ 99	$ —	$ —	$ 36	$ 36
Collectively evaluated for impairment (portfolio)	2	66	36	104	2	63	45	110
	$ 2	$ 95	$ 106	$ 203	$ 2	$ 63	$ 81	$ 146
Ending balance (recorded investment, gross of allowance for credit losses):								
Individually evaluated for impairment (specific)	$ —	$ 650	$ 169	$ 819	$ —	$ —	$ 100	$ 100
Collectively evaluated for impairment (portfolio)	$ 18	$ 33,242	$ 5,984	$39,244	$ 29	$ 32,470	$ 5,503	$ 38,002

The Company's senior secured commercial loan portfolio credit risk is managed using credit risk ratings determined by using a combination of objective and subjective criteria. Objective criteria include a loan score, the status of a borrower's compliance with loan covenants and a borrower's actual performance relative to its financial operating plan. The Company uses a loan score model to capture certain key performance parameters and coverage ratios. The model results in a rating computation that is equal to a weighted average of specific variables which are viewed to be critical determinants of a loan's creditworthiness. Borrowers can achieve a loan score as low as "0" or as high as "10" (lower scores indicating a better assessment of creditworthiness). The majority of the loans are expected to fall in the 3 to 6 range given the middle market nature of the businesses / borrowers coupled with the Company's focus on higher yielding and leveraged loans. The loan score model is based on a blend of historic performance and prospective coverage, resulting in a borrower's score being reflective of how well the borrower is positioned to meet future obligations. The more subjective criteria includes a credit risk rating system that incorporates the loan score model, industry trends, borrower, sponsor, and management issues that have a potential impact on the credit, and other issues surfaced that are determined to impact positively or negatively the Company's position relative to the credit exposure. The credit risk rating system has a risk rating range from A through F and the following guidelines:

A. Performing – High: No covenant violations, meets or exceeds financial operating plan, strong management team and supportive sponsor, positive industry trends, loan score rating of 2.0 or lower.

B+. Performing – Plus: Credits that exhibit all of the characteristics of B rated loans and many, but not all of the characteristics of A rated loans.

B. Performing – Standard: No covenant violations, substantially meets financial operating plan, positive industry trends or company well positioned to maintain strong performance through negative industry trend, stable company / management / sponsor dynamics, loan score rating of 6.0 or lower.

NOTE 6 - INVESTMENTS (continued)

C+. Performing – Minus: Loans that exhibit some of the characteristics of C rated loans with expectation of a nearer term upgrade or downgrade resulting from ongoing performance and/or other factors that reflect strengthening of weakening of the borrower's creditworthiness.

C. Performing – Special Attention: Currently meets all payment obligations, exhibits weakness in one or more of the following areas: negative industry trend, covenant violation(s), company / sponsor / management issue(s), near-term performance outlook, negative loan score trend, loan score rating 6.0 or higher.

D. Watch List: Currently meets all payment obligations, covenant violation(s) and anticipated continuing covenant violations, trends or actual events that suggest continuing deterioration of the credit, credit requires significant account management attention, payment in full of principal and interest are at potential risk, such that close scrutiny of credit and additional actions are warranted, negative loan score trend, loan score rating 7.0 or higher.

E. Nonperforming: Not currently meeting all scheduled payments of principal (not including revolver overadvances resulting from a leverage based borrowing base), interest, excess cash flow sweep payments due and other fees and expenses.

F. Write-Off: Loss of some or all principal is a certainty and is reasonably quantifiable.

The Company's senior secured commercial loans at amortized cost by credit rating determined using the most recently available borrower information at December 31, 2019 and 2018 were as follows (in millions):

	2019								
Credit Rating	**A**	**B+**	**B**	**C+**	**C**	**D**	**E**	**F**	**Total**
Nonimpaired loans	$ 15	$ —	$ 5,263	$ 371	$ 423	$ —	$ —	$ —	$ 6,072
Allowance for loan losses	—	—	(14)	(1)	(21)	—	—	—	(36)
Deferred loan fees	—	—	(81)	(3)	(4)	—	—	—	(88)
Nonimpaired loans, net	15	—	5,168	367	398	—	—	—	5,948
Impaired loans	—	—	—	—	—	37	134	—	171
Allowance for loan losses	—	—	—	—	—	(6)	(64)	—	(70)
Deferred loan fees	—	—	—	—	—	—	(2)	—	(2)
Impaired loans, net	—	—	—	—	—	32	68	—	99
Total loans, net	$ 15	$ —	$ 5,168	$ 367	$ 398	$ 32	$ 68	$ —	$ 6,047

	2018								
Credit Rating	**A**	**B+**	**B**	**C+**	**C**	**D**	**E**	**F**	**Total**
Nonimpaired loans	$ —	$ —	$ 4,961	$ 186	$ 370	$ 51	$ 13	$ —	$ 5,581
Allowance for loan losses	—	—	(13)	(1)	(18)	(6)	(7)	—	(45)
Deferred loan fees	—	—	(73)	(2)	(4)	—	—	—	(79)
Nonimpaired loans, net	—	—	4,875	183	348	45	6	—	5,457
Impaired loans	—	—	—	—	—	—	100	1	101
Allowance for loan losses	—	—	—	—	—	—	(36)	—	(36)
Deferred loan fees	—	—	—	—	—	—	—	—	—
Impaired loans, net	—	—	—	—	—	—	64	1	65
Total loans, net	$ —	$ —	$ 4,875	$ 183	$ 348	$ 45	$ 70	$ 1	$ 5,522

Impaired senior secured commercial loans with an average recorded investment of $76 million and $105 million were outstanding during the years ended December 31, 2019 and 2018, respectively. At December 31, 2019 and 2018, there were no impaired senior secured commercial loans that did not have a corresponding allowance for loan losses. Interest and fee income on impaired loans is recorded on a cash basis from the date of impairment and was $9 million and $1 million during 2019 and 2018, respectively.

NOTE 6 - INVESTMENTS (continued)

All senior secured commercial loan modifications (including partial principal forgiveness, term extensions, and reductions in interest, among other changes) are reviewed for potential TDR classification. At December 31, 2019 and 2018, loans outstanding classified as TDR totaled $139 million and $59 million, with no related allowance for loan losses for 2019 or 2018. There were no charges-offs and $52 million of charge-offs recognized on TDRs on one loan for the years ended December 31, 2019 and 2018, respectively. There were no loans modified in TDRs that experienced a payment default during the years ended December 31, 2019 and 2018, and for which the payment default occurred within one year of the modification. At December 31, 2019 and 2018, commitments to lend additional funds to borrowers whose terms have been modified in TDRs were $9 million and $15 million, respectively.

Other Investments

The components of Other investments at December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Investments, at fair value, of consolidated investment companies	$ 7,190	$ 6,028
Limited partnerships/limited liability companies	7,187	6,702
Real estate	2,921	2,268
Loans of certain consolidated VIEs	1,187	1,507
Derivatives	945	908
Securities purchased under agreements to resell	528	562
Short term investments	236	137
Other invested assets	633	589
Total other investments	$ 20,827	$ 18,701

Unfunded commitments on limited partnerships, limited liability companies and senior secured commercial loans were $8,110 million and $8,960 million at December 31, 2019 and 2018, respectively.

Investments, at fair value, of consolidated investment companies consist primarily of equity securities, real estate, other limited partnerships, and fixed maturities.

Accumulated depreciation on real estate was $365 million and $305 million at December 31, 2019 and 2018, respectively. Depreciation expense was $88 million and $79 million for the years ended December 31, 2019 and 2018, respectively, and was recorded as a component of Net investment income in the accompanying Consolidated Statements of Operations.

The Company receives tax credits related to its investments in qualified affordable housing projects. At December 31, 2019 and 2018, the Company had $170 million and $219 million, respectively, in qualified affordable housing investments, included in Limited partnerships/limited liability companies in the table above. The investment balance includes $22 million and $25 million of unfunded commitments at December 31, 2019 and 2018, respectively. During 2019 and 2018, the Company recorded amortization on these investments under the proportional amortization method of $49 million and $62 million, respectively. The Company recorded tax credits and other tax benefits on these investments of $58 million and $98 million for 2019 and 2018, respectively. Both the amortization of the investments as well as the tax credits and tax benefits are recognized as a component of income tax expense (benefit).

Included in Other invested assets in the table above are certain equity investments without a readily determinable fair value for which the Company has elected the measurement alternative allowed under current guidance. The carrying value of those investments at December 31, 2019 and 2018 was $178 million and $157 million, respectively. During 2019 and 2018, the Company recorded $9 million and $10 million, respectively, in impairments on these investments. In addition, for some of these investments, the Company recorded $4 million of upward and downward adjustments, respectively, resulting from observable price changes.

NOTE 6 - INVESTMENTS (continued)

Variable Interest Entities

The following table presents the carrying value of assets and liabilities of all of the Company's consolidated VIEs at December 31, 2019 and 2018 (in millions):

	2019			2018		
Consolidated Statements of Financial Position Line Item	**Managed VIEs**	**Other Consolidated VIEs**	**Total**	**Managed VIEs**	**Other Consolidated VIEs**	**Total[(1)]**
Fixed maturities, securities at fair value	$ 12	$ —	$ 12	$ 12	$ —	$ 12
Equity securities, securities at fair value	469	—	469	372	—	372
Mortgage loans	1,438	—	1,438	1,292	—	1,292
Other investments	8,705	47	8,752	7,728	85	7,813
Cash and cash equivalents	397	4	401	362	7	369
Investment income due and accrued	18	—	18	16	1	17
Other assets	381	—	381	255	—	255
Total assets	$ 11,420	$ 51	$ 11,471	$ 10,037	$ 93	$ 10,130
Debt	$ 2,692	$ 50	$ 2,742	$ 2,743	$ 91	$ 2,834
Other liabilities	351	—	351	223	1	224
Total liabilities	$ 3,043	$ 50	$ 3,093	$ 2,966	$ 92	$ 3,058

(1) The previously reported 2018 amounts for total assets of $6,380 million and total liabilities of $1,843 million were revised.

Managed VIEs

The Company is the investment manager for certain collateralized and other investment structures, for which the Company earns fee income. The Company analyzes these relationships to determine whether it has (1) the power to direct the activities of the VIE that most significantly impacts the economic performance of the entity and (2) the obligation to absorb losses or the right to receive benefits of the entity that could be potentially significant and thus determined to be the primary beneficiary. This analysis includes a review of the Company's rights and responsibilities as investment manager, the fees received by the Company and other interest (if any) held by the Company. The Company is not required to provide, and has not provided, material financial or other support to any VIE for which it is the investment manager.

The Company has analyzed these relationships and determined that it is the primary beneficiary for certain collateralized and other investment structures and consolidates these entities. The assets of these VIEs are restricted and must be used to settle liabilities of the VIE. Creditors have no recourse against the Company in the event of default by these VIEs, nor does the Company have any significant implied or unfunded commitments to these VIEs.

The FVO has been elected for the financial assets and liabilities of the consolidated collateralized VIEs, and therefore, assets and liabilities are reported at fair value, with changes in fair value reflected in Net investment gains (losses). The fair value of those eligible assets at December 31, 2019 and 2018, totaled $1,182 million and $1,219 million, respectively. The outstanding principal of these assets at December 31, 2019 and 2018, totaled $1,219 million and $1,247 million, respectively. The fair value of those eligible liabilities at December 31, 2019 and 2018, totaled $1,227 million and $1,276 million, respectively. The outstanding principal of these liabilities at December 31, 2019 and 2018, totaled $1,169 million and $1,203 million, respectively.

During the years ended December 31, 2019 and 2018, the change in fair value of the assets resulted in a loss of $4 million and a loss of $13 million, respectively, which was recorded in Net investment gains (losses) in the accompanying Consolidated Statements of Operations. Interest income is recorded in Net investment income in the accompanying Consolidated Statements of Operations. During the years ended December 31, 2019 and 2018 the change in fair value of the liabilities resulted in a loss of $6 million and less than $1 million, respectively, which was recorded in Net investment gains (losses) in the accompanying Consolidated Statements of Operations.

NOTE 6 - INVESTMENTS (continued)

The Company's financial or other support provided to these VIEs is limited to its investment management services and, in certain cases, its original investment. The Company's maximum exposure to loss resulting from its relationship with the managed VIEs is limited to its investment in the structures. At December 31, 2019 and 2018, the Company's maximum exposure to loss was $439 million and $392 million, respectively.

For certain consolidated collateralized structures, the Company elected the measurement alternative for valuing the financial liabilities of these entities. Refer to Note 9 - Fair Value Measurements for more information on the measurement alternative.

Other Consolidated VIEs

At December 31, 2019 and 2018, the Company consolidated other VIEs for which it was determined to be the primary beneficiary. These VIEs consisted of certain entities where the Company is not the investment manager. Creditors have no recourse against the Company in the event of default by these VIEs. The Company's maximum exposure to loss resulting from its relationship with these structures is limited to its investment. At December 31, 2019 and 2018, the Company's maximum exposure to loss was $67 million and $100 million, respectively.

Unconsolidated VIEs

In the normal course of its activities, the Company will invest in structured investments, including VIEs for which it is not the primary beneficiary. These structured investments typically invest in fixed income investments that are managed by third parties and include asset-backed securities, commercial mortgage-backed securities and residential mortgage-backed securities. The Company's maximum exposure to loss on these structured investments, both VIEs and non-VIEs, is limited to the amount of its investment. The Company has not provided financial or other support, other than its direct investment, to these structures. The Company has determined that it is not the primary beneficiary of these structures because it does not have the power to direct the activities that significantly impact the VIE's economic performance. The Company classifies these investments as Fixed maturities - Available-for-sale and Fixed maturities - Securities at fair value. The maximum exposure to loss associated with these investments was $65,801 million and $60,617 million at December 31, 2019 and December 31, 2018, respectively.

In the normal course of its activities, the Company will invest in joint ventures, limited partnerships and limited liability companies. These investments include hedge funds, private equity funds and real estate related funds that may or may not be VIEs. The Company's maximum exposure to loss on these investments, both VIEs and non-VIEs, is limited to the amount of its investment. The Company has determined that it is not the primary beneficiary of these structures because it does not have the power to direct the activities that significantly impact the entities' economic performance. The Company classifies these investments in Other investments in the accompanying Consolidated Statements of Financial Position and its maximum exposure to loss associated with these entities was $7,187 million and $6,702 million at December 31, 2019 and December 31, 2018, respectively.

These investments are subject to ongoing review for impairment and for events that may cause management to reconsider whether or not it is the primary beneficiary. The Company has no additional economic interest in these structures in the form of derivatives, related guarantees, credit enhancement or similar instruments and obligations. Creditors have no recourse against the Company in the event, of default. The Company has unfunded commitments in joint ventures, limited partnerships and limited liability companies, which are discussed in the Other investments section above.

In addition, not reflected in the table above, are MTN liabilities of $16,584 million and $14,514 million at December 31, 2019 and 2018, respectively, which are included in Policyholders' account balances in the accompanying Consolidated Statements of Financial Position.

NOTE 6 - INVESTMENTS (continued)

Restricted Assets and Special Deposits

Assets with a carrying value of $373 million and $341 million at December 31, 2019 and 2018, respectively, were on deposit with governmental authorities or trustees as required by certain state insurance and foreign government laws and are included within related invested assets in the accompanying Consolidated Statements of Financial Position.

In addition, assets with a carrying value of $10,182 million and $10,090 million at December 31, 2019 and 2018 are held in a grantor trust and are only available for satisfying certain reinsurance liabilities. Refer to Note 13 - Reinsurance for additional discussion.

Refer to Note 11 - Policyholders' Liabilities and Note 16 - Commitments and Contingencies, Loaned Securities and Repurchase Agreements for additional discussion on assets pledged as collateral.

NOTE 7 - DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT

The Company uses derivative instruments to manage interest rate, currency, equity, and credit risk. These derivative instruments include foreign currency and bond forwards, interest rate futures, interest rate and equity options, and interest rate, inflation, credit default, total return, equity and foreign currency swaps. The Company does not engage in derivative instrument transactions for speculative purposes. Refer to Note 3 - Significant Accounting Policies for a discussion on the accounting for derivative instruments.

The Company may enter into exchange-traded futures and over-the-counter("OTC") derivative instruments. Exchange-traded futures are executed through regulated exchanges and require daily posting of initial and variation margin. When the Company enters into exchange-traded futures, it is exposed to credit risk resulting from default of the exchange.

OTC derivatives may either be cleared through a clearinghouse ("OTC-cleared") or transacted between the Company and a counterparty under bilateral agreements ("OTC-bilateral"). Similar to exchange-traded futures, OTC-cleared derivatives require, initial and daily variation margin postings. When transacting OTC-cleared derivatives, the Company is exposed to credit risk resulting from default of the clearinghouse and/or default of the Futures Commission Merchant (e.g. clearinghouse agent).

When transacting OTC-bilateral derivatives, the Company is exposed to the potential default of its OTC-bilateral counterparty. The Company deals with a large number of highly rated OTC-bilateral counterparties, thus limiting its exposure to any single counterparty. The Company has controls in place to monitor credit exposures of OTC-bilateral counterparties by limiting transactions within specified dollar limits and continuously assessing the creditworthiness of its counterparties. The Company uses master netting arrangements and adjusts transaction levels, when appropriate, to minimize risk. The Company's policy is not to offset the fair value amounts recognized for derivatives executed with the same OTC-bilateral counterparty under the same master netting agreements with the associated collateral.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

The following table presents recognized derivative instruments that are subject to enforceable master netting agreements at December 31, 2019 and 2018 (in millions):

	2019						
	Gross Amounts of Recognized Derivative Instruments [1]	Gross Amounts Offset in the Statements of Financial Position	Gross Amounts Presented in the Statements of Financial Position	Gross Amounts Not Offset in Statements of Financial Position	Cash Collateral	Securities Collateral	Net Amounts of Recognized Derivative Instruments
Assets	$ 945	$ —	$ 945	$ (245)	$ (577)	$ (101)	$ 22
Liabilities	$ (305)	$ —	$ (305)	$ 245	$ 58	$ —	$ (2)

	2018						
	Gross Amounts of Recognized Derivative Instruments [1]	Gross Amounts Offset in the Statements of Financial Position	Gross Amounts Presented in the Statements of Financial Position	Gross Amounts Not Offset in Statements of Financial Position	Cash Collateral	Securities Collateral	Net Amounts of Recognized Derivative Instruments
Assets	$ 908	$ —	$ 908	$ (306)	$ (512)	$ (72)	$ 18
Liabilities	$ (396)	$ —	$ (396)	$ 306	$ 85	$ —	$ (5)

(1) The gross amounts exclude investment income due and accrued and accrued investment expense on derivatives, which are included in Other assets and Other liabilities, respectively.

Credit risk is managed by entering into transactions with creditworthy counterparties and obtaining collateral where appropriate. All of the net credit exposure for the Company from derivative contracts is with investment-grade counterparties. For OTC-cleared and exchange traded derivatives, the Company obtains variation margin which is adjusted daily based on the parties' net derivative position.

For OTC-bilateral derivatives, the Company obtains collateral in accordance with the terms of credit support annexes ("CSAs") negotiated as part of the master agreements entered into with most OTC-bilateral counterparties. The CSA defines the terms under which collateral is transferred between the parties in order to mitigate credit risk arising from "in the money" derivative positions. The CSA requires that an OTC-bilateral counterparty post collateral to secure its anticipated derivative obligation, taking into account netting arrangements. In addition, certain of the Company's CSAs require that if the Company's (or its counterparty's) credit rating were to fall below a specified rating assigned by a credit rating agency, the other party could request immediate payout on all transactions under the CSAs or full collateralization of the positions thereunder. Cash collateral is invested in short-term investments. If the credit contingent features had been triggered at December 31, 2019, the Company estimates that it would have had to post additional collateral of $3 million. For a one notch downgrade in the Company's credit rating, the Company would have had to post additional collateral of $3 million for a downgrade that would trigger full collateralization.

The Company may be exposed to credit-related losses in the event that an OTC-bilateral counterparty fails to perform its obligations under its contractual terms. In contractual arrangements with OTC-bilateral counterparties that do not include netting provisions in the event of default, credit exposure is limited to the positive fair value of derivatives at the reporting date. In contractual arrangements with OTC-bilateral counterparties that include netting provisions, in the event of default, credit exposure is limited to the net fair value, if positive, of all derivatives at the reporting date.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

The following table presents the notional amount and gross fair value of derivative instruments that are qualifying and designated for hedge accounting, by type of hedge designation, and those that are not designated for hedge accounting (excluding embedded derivatives) at December 31, 2019 and 2018 (in millions):

		2019			2018		
		Volume	Fair Value(2)(3)		Volume	Fair Value(2)(3)	
	Primary Risk Exposure	Notional Amount(1)	Asset	Liability	Notional Amount(1)	Asset	Liability
Derivatives qualifying and designated:							
Cash flow hedges:							
Foreign currency swaps	Currency	$ 74	$ 10	$ —	$ 153	$ 25	$ —
Interest rate swaps	Interest	50	—	—	50	—	—
Subtotal		124	10	—	203	25	—
Net investment hedges:							
Foreign currency forwards	Currency	74	—	1	74	2	—
Subtotal		74	—	1	74	2	—
Total derivatives qualifying and designated		198	10	1	277	27	—
Derivatives not designated:							
Bond forwards	Interest	15	—	1	—	—	—
Interest rate options	Interest	97,241	3	2	117,392	47	—
Equity options	Equity	375	13	3	738	34	6
Foreign currency forwards	Currency	384	2	4	242	5	—
Foreign currency swaps	Currency	13,212	692	124	10,454	646	225
Futures	Equity	551	—	1	39	—	—
Inflation swaps	Interest	476	—	86	476	1	64
Interest rate swaps	Interest	5,268	203	68	5,320	131	96
Synthetic GICs	Interest	6,884	1	—	5,286	3	—
Total return swaps	Interest	5	—	—	—	—	—
Credit default swaps:							
Buy protection	Credit	1,329	—	15	1,392	—	5
Sell protection	Credit	1,156	21	—	1,005	14	—
Total derivatives not designated		126,896	935	304	142,344	881	396
Total derivatives		$ 127,094	$ 945	$ 305	$ 142,621	$ 908	$ 396

(1) Notional amounts of derivative instruments generally do not represent the amounts exchanged between the parties engaged in the transaction.
(2) The fair value amounts exclude investment income due and accrued, and accrued investment expense on derivatives, which is included in Other assets and Other liabilities. Refer to Note 9 - Fair Value Measurements for a discussion of valuation methods for derivative instruments.
(3) The fair value is included within Other assets and Other liabilities in the accompanying Consolidated Statements of Financial Position.

Interest Rate Risk Management

The Company enters into various types of interest rate derivatives to minimize exposure to fluctuations in interest rates on assets and liabilities held by the Company.

Interest rate swaps are used by the Company to hedge interest rate risk for individual and portfolios of assets. Interest rate swaps are agreements with other parties to exchange, at specified intervals, the difference between interest amounts calculated by reference to an agreed upon notional value. Generally, no cash is exchanged at the onset of the contract and no principal payments are made by either party. The Company does not act as an intermediary or broker in interest rate swaps.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

Inflation swaps are used by the Company to hedge inflation risk of certain policyholder liabilities linked to the U.S. Consumer Price Index.

Interest rate (Treasury) futures are used by the Company to manage duration of the Company's fixed income portfolio. Interest rate futures are exchange traded contracts to buy or sell a bond at a specific price at a future date.

Interest rate options are used by the Company to hedge the risk of increasing interest rates on policyholder liabilities. Under these contracts, the Company will receive payments from counterparties should an agreed upon interest rate level be reached and payments will continue to increase under the option contracts until an agreed upon interest rate ceiling, if applicable.

Bond forwards and total return swaps are used to replicate the return and price risk of long-dated fixed income securities.

Currency Risk Management

The primary purpose of the Company's foreign currency hedging activities is to protect the values of foreign currency denominated assets from the risk of changes in foreign exchange rates.

Foreign currency swaps are agreements with other parties to exchange, at specified intervals, principal and interest in one currency for the same in another, at a fixed exchange rate, which is generally set at inception and calculated by reference to an agreed upon notional value. Generally, only principal payments are exchanged at the onset and the end of the contract.

Foreign currency forwards involve the exchange of foreign currencies at a specified future date and at a specified price. No cash is exchanged at the time the agreement is entered into.

Equity Risk Management

The Company purchases equity options to minimize exposure to the market risk associated with guarantees on certain underlying policyholder liabilities. Options require upfront fees paid at the time the agreements are entered into. Equity swaps are agreements between parties to exchange interest payments for an equity return.

The Company enters into equity futures transactions to hedge equity exposure in the general account portfolio.

Credit Risk Management

The Company enters into credit default swaps ("CDS") both to buy protection from and sell protection to a counterparty in the event of a default of a single name reference obligation or a referenced pool of assets. The Company uses combinations of CDS to swap the credit risk of certain foreign government issued fixed maturities with the credit risk of certain U.S. corporate securities or indices. These CDS synthetically diversify the Company's investments, which limits the Company's exposure to a single credit event.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

Cash Flow Hedges

The following table presents the effects of derivatives in qualified cash flow hedging relationships for the years ended December 31, 2019 and 2018 (in millions):

	Gain (Loss) Recognized in OCI (Effective Portion)[1]		Gain (Loss) Reclassified from AOCI into Net Income (Effective Portion)			
			Net Investment Gains (Losses)		Net Investment Income	
	2019	2018	2019	2018	2019	2018
Foreign currency swaps	$ 1	$ 11	$ 15	$ —	$ 2	$ 1
Interest rate swaps	5	(1)	3	4	6	6
Total	$ 6	$ 10	$ 18	$ 4	$ 8	$ 7

(1) The amount of gain or (loss) recognized in OCI is reported as a change in net unrealized investment gains or losses, a component of AOCI.

In 2019 and 2018, there were no instances in which the Company discontinued cash flow hedge accounting because the forecasted transactions for which a hedge was entered into did not occur on the anticipated date or in the additional time period permitted under the authoritative guidance on derivatives and hedging.

There were no hedged forecasted transactions, other than receipt or payment of variable interest payments.

For derivatives which are designated for hedge accounting, there were no components of the derivative's gain or loss excluded from the assessment of effectiveness for the years ended December 31, 2019 and 2018.

Presented below is a rollforward of the components of AOCI, before taxes, related to cash flow hedges (in millions):

	2019	2018
Balance, beginning of year	$ 169	$ 170
Gains deferred in OCI on the effective portion of cash flow hedges	6	10
Gains reclassified to net income	(26)	(11)
Balance, end of year	$ 149	$ 169

At December 31, 2019, gains of $7 million on derivatives in AOCI are expected to be reclassified to earnings within the next 12 months.

Net Investment Hedges

The following table presents the effects of derivatives in net investment hedging relationships, for the years ended December 31, 2019 and 2018 (in millions):

	Gain (Loss) Recognized in OCI (Effective Portion)[1]		Gain (Loss) Reclassified from AOCI into Net Income (Effective Portion)[2]	
	2019	2018	2019	2018
Foreign currency forwards	$ (3)	$ 7	$ —	$ 2

(1) The amount of gain is reflected in OCI as part of the foreign currency translation adjustment.
(2) The amount is reported in net investment gains or losses.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

Presented below is a rollforward of the components of AOCI, before taxes, related to net investment hedges (in millions):

	2019	2018
Balance, beginning of year	$ (195)	$ (200)
Losses deferred in OCI on the effective portion of net investment hedges	(3)	7
(Gains) losses reclassified to net income	—	(2)
Balance, end of year	$ (198)	$ (195)

Derivatives Not Designated

The Company has derivative instruments that are not designated or do not qualify for hedge accounting treatment.

The following table provides gains and losses on derivative instruments not designated for hedge accounting, which are included in Net investment gains (losses) in the accompanying Consolidated Statements of Operations for the years ended December 31, 2019 and 2018 (in millions):

Derivative Type	2019	2018
Bond forwards	$ (1)	$ —
Interest rate options	(46)	(32)
Equity options	(9)	(11)
Foreign currency forwards	10	28
Foreign currency swaps	177	294
Futures	(11)	—
Inflation swaps	(29)	(13)
Interest rate swaps	119	(73)
Synthetic GICs	(2)	2
Credit default swaps:		
Buy protection	(11)	(4)
Sell protection	5	—
Net investment gains (losses)	$ 203	$ 191

Credit Derivatives Written

The Company enters into CDS both to buy protection from, and sell protection to counterparties in the event of default of a single name reference obligation or a referenced pool of assets. At December 31, 2019, all of the underlying reference obligations of the CDS in which the Company sells protection are investment grade. The single name CDS contracts, in which the Company sells protection, mature within five years. The maximum amount the Company would be required to pay under swaps in which credit protection was sold, assuming all reference obligations default at a total loss without recoveries, would be $1,156 million and $1,005 million at December 31, 2019 and 2018, respectively. The market value of swaps for credit protection sold was a net asset of $21 million and $14 million at December 31, 2019 and 2018, respectively.

Embedded Derivatives

The Company has certain embedded derivatives that are required to be separated from their host contracts and accounted for as derivatives. At December 31, 2019 and 2018, there were no embedded derivatives that could not be separated from their host contracts.

NOTE 7 – DERIVATIVE INSTRUMENTS AND RISK MANAGEMENT (continued)

The following table presents the fair value of the Company's embedded derivatives in host contracts at December 31, 2019 and 2018 (in millions):

Host Contracts	Consolidated Statements of Financial Position Line Item	2019	2018
Guaranteed minimum accumulation benefits ("GMAB")[1]	Policyholders' account balances	$ (44)	$ 36
Immediate participation guarantee ("IPG") contracts[1]	Policyholders' account balances	771	184
Separate account index	Policyholders' account balances	44	23
Other	Other liabilities	143	110
Total		$ 914	$ 353

[1] For further information on these embedded derivatives refer to Note 9 - Fair Value Measurements.

The following table presents the changes in fair value related to embedded derivatives for the years ended December 31, 2019 and 2018 (in millions):

Consolidated Statements of Operations	2019	2018
Net investment gains (losses)	$ 2	$ 2
Management fees and other income	$ (36)	$ 42
Interest credited to policyholders' account balances	$ 526	$ (283)

NOTE 8 - SEPARATE ACCOUNTS

Separate Accounts Registered with the SEC

The Company maintains separate accounts, which are registered with the SEC, for its variable deferred annuity and variable life insurance products with assets of $34,289 million and $29,113 million at December 31, 2019 and 2018, respectively. The assets in these separate accounts are comprised of investments in shares of the New York Life sponsored MainStay VP Funds Trust and other non-proprietary insurance-dedicated funds.

Separate Accounts Not Registered with the SEC

The Company also maintains separate accounts, which are not registered with the SEC, with assets of $9,296 million and $7,842 million at December 31, 2019 and 2018, respectively. The assets in these separate accounts are comprised of hedge funds, investments in MainStay VP Funds Trust, non-proprietary mutual funds, privately placed corporate bonds, mortgage-backed and asset-backed securities, as well as publicly traded investment grade corporate bonds, high-yield bonds, treasury bonds, equities and limited partnerships. The assets in these separate accounts are carried at fair value.

Refer to Note 11 - Policyholders' Liabilities for information regarding separate accounts with contractual guarantees for guaranteed minimum death benefits ("GMDB"), GMAB, enhanced beneficiary benefit ("EBB") and guaranteed future income benefits ("GFIB").

NOTE 9 - FAIR VALUE MEASUREMENTS

Fair Value Measurements

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The Company's assets and liabilities recorded at fair value, except certain assets for which the NAV per share is used as a practical expedient, are measured and classified in accordance with a fair value hierarchy consisting of three levels based on the observability of the inputs used in measuring the fair value. The level is determined based on the lowest level input that is significant to the fair value measurement.

The levels of the fair value hierarchy based on the inputs to the valuation are as follows:

Level 1 Fair value is based on unadjusted quoted prices for identical assets or liabilities in an active market. Active markets are defined as a market in which many transactions occur with sufficient frequency and volume to provide pricing information on an ongoing basis.

Level 2 Observable inputs other than Level 1 prices, such as quoted prices in active markets for similar assets or liabilities; quoted prices in markets that are not active for identical or similar assets or liabilities, or other model driven inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities. Valuations are generally obtained from third-party pricing services for identical or comparable assets or liabilities or through the use of valuation methodologies using observable market inputs.

Level 3 Instruments whose values are based on prices or valuation techniques that require inputs that are both unobservable and significant to the overall fair value measurement. These inputs reflect management's own assumptions in pricing the asset or liability. Pricing may also be based upon broker quotes that do not represent an offer to transact. Prices are determined using valuation methodologies such as option pricing models, discounted cash flow models and other similar techniques. Non-binding broker quotes, which are utilized when pricing service information is not available, are reviewed for reasonableness based on the Company's understanding of the market, and are generally considered Level 3. To the extent the internally developed valuations use significant unobservable inputs; they are classified as Level 3.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Determination of Fair Value

The Company has an established and well-documented process for determining fair value of its financial instruments.

Security pricing is applied using a hierarchy approach whereby publicly available prices are first sought from nationally recognized third party pricing services. For most private placement securities, the Company applies a matrix-based pricing methodology, which uses spreads derived from third party benchmark bond indices. For private placement securities that cannot be priced through these processes, the Company uses internal models and calculations. All other securities are submitted to independent brokers for prices. The Company performs various analyses to ascertain that the prices represent fair value. Examples of procedures performed include, but are not limited to, back testing recent trades, monitoring of trading volumes, and performing variance analysis of monthly price changes using different thresholds based on asset type. The Company also performs an annual review of all third-party pricing services. During this review, the Company obtains an understanding of the process and sources used by the pricing service to ensure that they maximize the use of observable inputs, the pricing service’s frequency of updating prices, and the controls that the pricing service uses to ensure that their prices reflect market assumptions. The Company also selects a sample of securities and obtains a more detailed understanding from each pricing service regarding how they derived the price assigned to each security. Where inputs or prices do not reflect market participant assumptions, the Company will challenge these prices and apply different methodologies that will enhance the use of observable inputs and data. The Company may use non-binding broker quotes or internal valuations to support the fair value of securities which go through this formal price challenge process.

In addition, the Company has a pricing committee that provides oversight over the Company’s prices and fair value process for securities. The committee is comprised of representatives from the Company's Investment Management group, Controller's, Compliance and Security Operations. The committee meets quarterly and is responsible for the review and approval of the Company’s valuation procedures. The committee is also responsible for the review of pricing exception reports as well as the review of significant inputs used in the valuation of assets that are valued internally.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

The following table presents the balances of assets and liabilities measured at fair value on a recurring basis at December 31, 2019 and 2018 (in millions):

	2019				
	Level 1	Level 2	Level 3	NAV as a Practical Expedient[2]	Total
Fixed maturities - available-for-sale					
U.S. Treasury	$ —	$ 2,499	$ —	$ —	$ 2,499
U.S. government corporations & agencies	—	6,497	—	—	6,497
U.S. agency MBS and ABS	—	31,492	1	—	31,493
Foreign governments	—	4,255	10	—	4,265
U.S. corporate	—	106,007	233	—	106,240
Foreign corporate	—	21,601	7	—	21,608
Non-agency RMBS	—	2,348	44	—	2,392
Non-agency CMBS	—	13,503	794	—	14,297
Non-agency ABS	—	14,323	683	—	15,006
Total fixed maturities - available-for-sale	—	202,525	1,772	—	204,297
Fixed maturities - securities, at fair value					
U.S. Treasury	—	344	—	—	344
U.S. government corporations & agencies	—	229	—	—	229
U.S. agency MBS and ABS	—	1,073	—	—	1,073
Foreign governments	—	368	—	—	368
U.S. corporate	—	10,305	60	—	10,365
Foreign corporate	—	7,711	14	—	7,725
Non-agency RMBS	—	111	3	—	114
Non-agency CMBS	—	701	13	—	714
Non-agency ABS	—	680	33	—	713
Total fixed maturities - securities, at fair value	—	21,522	123	—	21,645
Equity securities, at fair value					
Common stock	2,921	376	222	—	3,519
Non-redeemable preferred stock	—	56	74	—	130
Mutual funds	47	—	—	—	47
Total equity securities, at fair value	2,968	432	296	—	3,696
Securities purchased under agreements to resell	—	528	—	—	528
Mortgage loans	—	—	1,240	—	1,240
Investments, at fair value, of consolidated investment companies	688	1,016	5,015	471	7,190
Loans of certain consolidated VIEs	—	1,187	—	—	1,187
Derivative assets (including embedded derivatives)	—	937	8	—	945
Short term investments	—	236	—	—	236
Other invested assets	—	160	—	—	160
Cash equivalents	1,042	3,500	—	—	4,542
Separate account assets	38,885	3,205	—	1,495	43,585
Limited partnerships/Limited liability companies	—	—	1	40	41
Reinsurance recoverable	—	—	3,433	—	3,433
Total assets accounted for at fair value on a recurring basis	**$ 43,583**	**$ 235,248**	**$ 11,888**	**$ 2,006**	**$ 292,725**
Future policy benefits	$ —	$ —	$ 7,818	$ —	$ 7,818
Policyholders' account balances	—	—	1,837	—	1,837
Dividends payable to policyholders	—	—	48	—	48
Policy claims	—	—	104	—	104
Debt	—	980	494	—	1,474
Reinsurance payable	—	—	4,105	—	4,105
Derivative liabilities	1	301	146	—	448
Other liabilities	—	—	47	—	47
Total liabilities accounted for at fair value on a recurring basis[1]	**$ 1**	**$ 1,281**	**$ 14,599**	**$ —**	**$ 15,881**

[1] Separate account liabilities are not included above as they are reported at contract value in accordance with the Company's policy (refer to Note 3 - Significant Accounting Policies).

[2] The fair value amounts presented in each category are intended to permit reconciliation of the total assets in this table to the amounts presented in the accompanying Consolidated Statements of Financial Position.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	2018				
	Level 1	Level 2	Level 3	NAV as a Practical Expedient[2]	Total
Fixed maturities - available-for-sale					
U.S. Treasury	$ —	$ 1,918	$ —	$ —	$ 1,918
U.S. government corporations & agencies	—	7,088	20	—	7,108
U.S. agency MBS and ABS	—	29,861	1	—	29,862
Foreign governments	—	3,630	19	—	3,649
U.S. corporate	—	91,531	192	—	91,723
Foreign corporate	—	20,051	47	—	20,098
Non-agency RMBS	—	2,275	17	—	2,292
Non-agency CMBS	—	11,599	526	—	12,125
Non-agency ABS	—	12,237	1,608	—	13,845
Total fixed maturities - available-for-sale	—	180,190	2,430	—	182,620
Fixed maturities - securities, at fair value					
U.S. Treasury	—	523	—	—	523
U.S. government corporations & agencies	—	215	—	—	215
U.S. agency MBS and ABS	—	1,052	—	—	1,052
Foreign governments	—	210	17	—	227
U.S. corporate	—	9,525	57	—	9,582
Foreign corporate	—	5,581	14	—	5,595
Non-agency RMBS	—	104	1	—	105
Non-agency CMBS	—	626	14	—	640
Non-agency ABS	—	618	78	—	696
Redeemable preferred securities	—	223	—	—	223
Total fixed maturities - securities, at fair value	—	18,677	181	—	18,858
Equity securities					
Common stock	2,875	348	246	3	3,472
Non-redeemable preferred stock	—	39	61	—	100
Mutual funds	10	—	—	51	61
Total equity securities	2,885	387	307	54	3,633
Securities purchased under agreements to resell	—	562	—	—	562
Mortgage loans	—	—	1,104	—	1,104
Investments, at fair value, of consolidated investment companies	724	613	4,205	478	6,020
Loans of certain consolidated VIEs	—	1,465	—	—	1,465
Derivative assets (including embedded derivatives)	—	858	50	—	908
Short term investments	—	137	—	—	137
Other invested assets	—	125	—	—	125
Cash equivalents	1,185	4,508	—	—	5,693
Separate account assets	32,322	3,269	3	1,361	36,955
Limited partnerships/Limited liability companies	—	—	2	44	46
Reinsurance recoverable	—	—	3,397	—	3,397
Total assets accounted for at fair value on a recurring basis	**$ 37,116**	**$ 210,791**	**$ 11,679**	**$ 1,937**	**$ 261,523**
Future policy benefits	$ —	$ —	$ 7,545	$ —	$ 7,545
Policyholders' account balances	—	—	1,392	—	1,392
Dividends payable to policyholders	—	—	61	—	61
Policy claims	—	—	155	—	155
Debt	—	1,236	385	—	1,621
Reinsurance payable	—	—	4,069	—	4,069
Derivative liabilities	1	394	112	—	507
Other liabilities	18	—	37	—	55
Total liabilities accounted for at fair value on a recurring basis[1]	**$ 19**	**$ 1,630**	**$ 13,756**	**$ —**	**$ 15,405**

[1] Separate account liabilities are not included above as they are reported at contract value in accordance with the Company's policy (refer to Note 3 - Significant Accounting Policies).

[2] The fair value amounts presented in each category are intended to permit reconciliation of the total assets in this table to the amounts presented in the accompanying Consolidated Statements of Financial Position.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

The following represents a summary of significant valuation techniques for assets and liabilities used to determine fair value, as well as the general classification of such instruments in the valuation hierarchy.

Fixed Maturities Available for Sale and Securities at Fair Value

Securities priced using a pricing service are generally classified as Level 2. The pricing service generally uses an income based valuation approach by using a discounted cash-flow model or a market approach by looking at recent trades of a specific security to determine fair value on public securities or a combination of the two. Typical inputs used by these pricing services include, but are not limited to: benchmark yields, reported trades, issuer spreads, bids, offers, benchmark securities, estimated cash flows and prepayment speeds.

Private placement securities are primarily priced using a market approach such as a matrix-based pricing methodology, which uses spreads derived from third-party benchmark bond indices. Specifically, the Barclays Investment Grade Corporate Index is used for investment-grade securities and the Citi High Yield Cash Index is used for below investment-grade securities. These indices are two widely recognizable, reliable and well regarded benchmarks by participants in the financial industry, which represents the broader U.S. public bond markets.

Certain private placement securities that cannot be priced using the matrix pricing described above, are priced by an internally developed discounted cash flow model or are priced based on internal calculations. The model uses observable inputs with a discount rate based off spreads of comparable public bond issues, adjusted for liquidity, rating and maturity. The Company assigns a credit rating for private placement securities based upon internal analysis. The liquidity premium is usually based on market transactions. These securities are classified as Level 2.

For some of the private placement securities priced through the model, the liquidity adjustments may not be based on market data, but rather, calculated internally. If the impact of the liquidity adjustment, which usually requires the most judgment, is not significant to the overall value of the security, the security is still classified as Level 2.

The valuation techniques for most Level 3 bonds are generally the same as those described in Level 2. However, if the investments are less liquid or are lightly traded, there is generally less observable market data, and therefore these investments will be classified as Level 3. Circumstances where observable market data are not available may include events such as market illiquidity and credit events related to the security. In addition, certain securities are priced based upon internal valuations using significant unobservable inputs. If a security could not be priced by a third party vendor or through internal pricing models, broker quotes are received and reviewed by each investment analyst. These inputs may not be observable. Therefore, Level 3 classification is determined to be appropriate.

Equity Securities

Securities valued using unadjusted quoted prices in active markets that are readily and regularly available are classified as Level 1. Those securities valued using a market approach in which market quotes are available but are not considered actively traded are classified as Level 2. Securities priced through an internal valuation where significant inputs are deemed to be unobservable, which includes securities of a government organization, are classified as Level 3.

For equity investments that do not have a readily available fair value, NAV is used as a practical expedient.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Securities Purchased Under Agreements to Resell

Due to the short-term nature (generally one month) of these securities, the asset's carrying value approximates fair value. These investments are classified as Level 2.

Mortgage Loans

The estimated fair value of mortgage loans held for investment and accounted for using the FVO is determined using an income approach, based upon the present value of the expected cash flows, discounted at an interpolated treasury yield plus a spread. The spread is based on management's judgment and assumptions, which takes into account property type, LTV and remaining term of each loan. The spread is a significant component of the pricing inputs, and therefore, these investments are classified as Level 3.

Investments, at Fair Value, of Consolidated Investment Companies

These investments consist of equity investments and fixed maturities held in consolidated limited partnerships. The valuation of the equity investments is derived using a market approach based on unadjusted quoted prices in active markets that are readily and regularly available, and are classified as Level 1. The value of the fixed maturity investments is obtained from third-party pricing services, and is classified as Level 2. These also contain the cash equivalents held in a consolidated VIE as discussed in Note 6 - Investments. However, when the assets of the consolidated limited partnership are valued using models that contain significant unobservable inputs, they are classified as Level 3.

The Company uses the NAV as practical expedient to determine the fair value of all the underlying investments in consolidated limited partnerships which (1) do not have a readily determinable fair value and (2) either have the attributes of an investment company or prepare their financial statements consistent with the measurement principles of an investment company.

Loans of Certain Consolidated VIEs

These assets are third party loans held in the collateralized structures discussed in Note 6 - Investments. The fair value of these assets is determined based on information obtained from a third-party pricing service, and they are classified as Level 2.

Derivative Assets and Liabilities

The fair value of derivative instruments is generally derived using valuation models that use an income approach, except for derivatives, which are either exchange-traded, or the fair value is derived using broker quotations. Where valuation models are used, the selection of a particular model depends upon the contractual terms of, and specific risks inherent in the instrument, as well as the availability of pricing information in the market. The Company generally uses similar models to value similar instruments. Valuation model inputs include contractual terms, yield curves, foreign exchange rates, equity prices, credit curves, measures of volatility, non-performance risk and other factors. Exchange-traded derivatives are valued using a market approach as fair value is based on quoted prices in an active market and are classified as Level 1. OTC derivatives that trade in liquid markets, such as currency forwards, swaps and options, where model inputs are observable for substantially the full term are classified as Level 2. Derivatives that are valued based upon models with any significant unobservable market inputs or inputs from less actively traded markets, or where the fair value is solely derived using broker quotations, are classified as Level 3.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

When appropriate, valuations of OTC-bilateral derivatives are adjusted for non-performance risk. The Company uses default estimates implied by CDS spreads on senior obligations of the counterparty in order to provide an objective basis for such estimates. When in a liability position, the Company uses its own medium term note spread to estimate the default rate. The non-performance risk adjustment is applied only to the uncollateralized portion of the OTC-bilateral derivative assets and liabilities. OTC-bilateral derivative contracts are executed under master netting agreements with counterparties with a CSA, which is a bilateral ratings-sensitive agreement that requires collateral postings at established credit threshold levels. These agreements protect the interests of the Company and its counterparties should either party suffer a credit-rating deterioration. The vast majority of the Company's derivative agreements are with highly rated major international financial institutions.

Short Term Investments

For short term investments, amortized cost is used as the best estimate of fair value, and they are classified as Level 2.

Other Invested Assets

This represents surplus note investments, priced by a third party pricing service, where the inputs to the valuation are deemed to be observable. Therefore, they are classified as Level 2.

Cash Equivalents

These include money market funds, treasury bills, commercial paper and other highly liquid instruments. The highly liquid instruments are classified as Level 1. All other investments are classified as Level 2, since due to their short term nature, amortized cost is used as the best estimate of fair value.

Separate Account Assets

Assets within the separate accounts are primarily invested in equities and fixed maturities. The fair value of investments in the separate accounts is calculated using the same procedures used for equities and fixed maturities in the general account.

The separate accounts also invest in limited partnerships and hedge funds. These investments are valued based on the latest NAV received using NAV as a practical expedient.

Limited Partnerships/Limited Liability Companies

Investments held in limited partnerships/limited liability companies consist of investments in private equity investments, joint ventures and other investments, which are valued at fair value.

Investments in joint ventures are carried at fair value and classified as Level 3. The underlying assets of the joint ventures are valued using the same methods that the Company uses for those assets it holds directly.

For investments in limited partnerships/limited liability companies that do not have a readily available fair value, NAV is used as a practical expedient.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

The following table provides additional information for investments that are measured at fair value using NAV as a practical expedient, as allowed under authoritative guidance, for investments that meet specified criteria (in millions):

		2019			
Category of Investment	**Investment Strategy**	**Fair Value Determined Using NAV**	**Unfunded Commitments**	**Redemption Frequency**	**Redemption Notice Period**
Hedge fund	Long/short equity, sector investing, futures, options, foreign exchange arbitrage, fixed income arbitrage	$ 407	$ —	Annual, Semi-Annual, Quarterly, Monthly, Daily	0-180 days or less (Assets subject to lock-up periods)
Hedge fund	Distressed securities, multi strategy	$ 274	$ —	Semi- Annual, Quarterly, Monthly	30-90 days (Assets subject to lock-up periods)
Private equity	Leveraged buyout, mezzanine financing, distressed securities	$ 1,285	$ 1,108	N/A	N/A
Limited partnerships	Traditional asset allocation, alternative medium/high volatility, special situations	$ 40	$ 27	Yearly, Quarterly, Monthly	90 days or less
Mutual funds	Multi strategy	$ —	$ —	Monthly	45 days (Assets subject to lock up periods)

		2018			
Category of Investment	**Investment Strategy**	**Fair Value Determined Using NAV**	**Unfunded Commitments**	**Redemption Frequency**	**Redemption Notice Period**
Hedge fund	Long/short equity, sector investing, futures, options, foreign exchange arbitrage	$ 378	$ —	Annual, Semi-Annual, Quarterly, Monthly, Daily	0-180 days or less (Assets subject to lock-up periods)
Hedge fund	Distressed securities, multi strategy	$ 262	$ —	Semi- Annual, Quarterly, Monthly	30-90 days (Assets subject to lock-up periods)
Private equity	Leveraged buyout, mezzanine financing, distressed securities	$ 1,137	$ 1,022	N/A	N/A
Limited partnerships	Traditional asset allocation, alternative medium/high volatility, special situations	$ 86	$ 26	Yearly, Quarterly, Monthly	90 days or less
Mutual funds	Multi strategy, global allocation	$ 51	$ —	Quarterly, Weekly	5 days - 45 days (Assets subject to lock up periods)
Collective investment trust	Investment grade fixed income	$ 23	$ —	On Request	N/A

Reinsurance Recoverable

Reinsurance recoverable represents recoverables and other receivables related to certain reinsurance assumed contracts that were partially retroceded for which the FVO is elected. Refer to Note 13 - Reinsurance for additional details. The fair value of the reinsurance recoverables is determined based on the estimated fair value of the underlying assets held by the Company in the portfolio backing these contracts. Other receivables, related to the above reinsurance contracts are short term in nature and the carrying value approximates the fair value. These assets are classified as Level 3.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Future Policy Benefits

Future policy benefits carried at fair value consist of certain reinsurance assumed liabilities for which the FVO was elected by the Company. The estimated fair value of the reinsurance assumed is reflected as i) the fair value of the permanently restricted assets net of certain liabilities which had a fair value of $6,828 million and $6,619 million at December 31, 2019 and 2018, respectively, as defined in Note 13 - Reinsurance, that must be passed back to the reinsured policyholders as future benefits or dividend payments, ii) the present value of future maintenance expenses to administer the business, and iii) the present value of future costs of capital that provides a return to the Company's policyholders for the investment in the assumed reinsurance and for the risks that the permanently restricted assets will not be sufficient to provide all required benefits. Maintenance expenses are discounted using treasury rates extrapolated to the estimated life of the insurance policies plus spreads based upon the Company's medium term notes, as discussed in the fair value of the GMAB and IPG liabilities above. Costs of capital are discounted at market consistent rates, where the market is reinsurance assumption transactions between highly rated insurance companies. Since many of the assumptions utilized are unobservable and are considered to be significant inputs to the liability valuation, the liability included in Future policy benefits has been classified as Level 3. Refer to Note 13 - Reinsurance for additional details.

Policyholders' Account Balances

Policyholders' account balances carried at fair value consist of general account and separate account embedded derivatives bifurcated from host contracts, which represent the embedded derivatives for GMAB and IPG contracts, and certain dividend accumulations for which the FVO has been elected.

The fair values of GMAB and IPG liabilities are calculated as the present value of future expected payments to customers less the present value of imputed or assessed rider fees attributable to the embedded derivative feature. This methodology could result in either a liability or contra-liability balance, given changing capital market conditions and various policyholder behavior assumptions. The expected cash flows are discounted using treasury rate plus a spread based upon the Company's medium term notes. The spread reflects the market's perception of the Company's non-performance risk. Since there is no observable active market for the transfer of these obligations, the valuations are calculated using internally developed models. Significant inputs to these models include capital market assumptions, such as interest rate, equity market, and implied volatility assumptions, as well as various policyholder behavior assumptions that are actuarially determined, including lapse rates, benefit utilization rates, mortality rates and withdrawal rates. These assumptions are reviewed at least annually, and updated based upon historical experience. Since many of the assumptions utilized are unobservable and are considered to be significant inputs to the liability valuation, the liability included in Policyholders' account balances has been classified as Level 3.

The IPG contracts provide for a return through periodic crediting rates and termination adjustments that are based on the performance of a contractually referenced pool of assets owned by the Company and thus contain an embedded derivative under the authoritative guidance for derivatives. The fair value of the embedded derivative is based primarily on the fair value adjustment on the referenced pool of assets.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Dividend accumulations related to certain reinsurance assumed liabilities for which the FVO was elected are reported at carrying value which approximates fair value and are classified as Level 3.

Dividends Payable to Policyholders

Dividends payable to policyholders reported at fair value are related to certain reinsurance assumed liabilities for which the FVO was elected. The liability is reported at carrying value which approximates the fair value and is classified as Level 3.

Policy Claims

Policy claims reported at fair value are related to certain reinsurance assumed liabilities for which the FVO was elected. The liability is reported at carrying value which approximates the fair value and is classified as Level 3.

Debt

In accordance with authoritative guidance on collateralized finance entities, the measurement alternative allows the financial assets and the financial liabilities to be measured using the more observable of the two. The Company has measured the long-term debt of certain of its consolidated collateralized structures using the fair value of the entities' financial assets, as their value has been deemed more observable. For discussion on the valuation of the entities' assets which are classified as Level 2, see loans of certain consolidated VIEs above. Debt of certain consolidated investment companies that carry their liabilities at fair value and are classified as Level 3 are based on non-binding broker quotes. The Company validated the broker quotes by calculating the internal rate of return (yield to maturity) and discount margin (spread over index) for each of the debt obligations based on various scenarios. The results of the scenario analysis were used to validate the broker quotes.

Reinsurance Payable

Primarily represents funds-withheld balances payable related to certain reinsurance assumed contracts that were partially retroceded for which the FVO was elected. Refer to Note 13 - Reinsurance for additional details. The fair value of the funds-withheld liability is determined based on the estimated fair value of the underlying assets held by the Company in the portfolio backing the certain reinsurance assumed contracts that were retroceded. Also included are certain other payables, related to the reinsurance contracts, which are of short term nature where carrying value approximates the fair value. These payables are classified as Level 3.

Other Liabilities

Other liabilities included in Level 1 mainly represent liabilities related to short sales of publicly traded common stock by one of the Company's consolidated investment funds. Other liabilities also include consideration payable related to acquisition activity which is required to be measured at fair value. The liability is valued using models that contain significant unobservable inputs and therefore is classified as Level 3.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Quantitative Information Regarding Internally Priced Level 3 Assets and Liabilities

The following table presents quantitative information on significant internally priced Level 3 assets and liabilities at December 31, 2019 and 2018 ($ in millions):

	2019			
	Fair Value	**Valuation Techniques**	**Unobservable Input**	**Range (Weighted Average)**
Assets:				
U.S. corporate[3]	$ 202	Discounted cash flows	Discount rate	2.5% - 21.9% (4.8%)
Non-agency ABS[3]	$ 288	Discounted cash flows	Discount rate	3.6% - 12.0% (5.9%)
Non-agency CMBS[3]	$ 143	Discounted cash flows	Discount rate	2.8% - 6.1% (3.6%)
Equity securities	$ 87	Market comparable	Revenue multiple	1.9x - 21.8x
Investments, at fair value of consolidated investment companies	$ 4,755	Market comparable	EBITDA multiple[1]	13.8x-43.5x
		Discounted cash flows	Discount rate	5.8% - 8.8% (7.0%)
			Capitalization rate	4.8% - 7.8% (6.0%)
			Revenue growth rate	0.0%
Mortgage loans	$ 1,240	Discounted cash flows	Discount rate	2.9% - 3.8% (3.3%)
Reinsurance recoverable	$ 233	Discounted cash flows	Discount rate	2.7% - 6.9%
			Mortality rate	0.01% - 50.0%
			Lapse rate	1.5% - 97.0%
Liabilities:				
Future policy benefits	$ 990	Discounted cash flows	Discount rate	2.7% - 6.9%
			Mortality rate	0.01% - 50.0%
			Lapse rate	1.5% - 97.0%
Policyholders' account balances	$ 815	Discounted cash flows	Equity returns	1.5% - 5.9%
		GMAB	Equity volatility curve	16.9% - 51.5%
			Lapse rate	0.2% - 35%
			Mortality rate	0.0% - 50%
			Utilization rate	0.1% - 100%
			Withdrawal rate	2.5% - 8.3%
			Discount rate	1.9% - 5.8%
		Market value of assets	Mark to market[2]	10.9%
		IPG	Ratio of liabilities to assets by investment year	60.43% - 128.64% (97.0%)
			Assumed amortization period	5 years

[1] EBITDA multiple represents multiples of earnings before interest, taxes, depreciation and amortization, and are amounts used when the reporting entity has determined that market participants would use these multiples when pricing the investments.
[2] Information received from independent third-party valuation service providers.
[3] Includes both Available-for-sale and Securities at fair value.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	2018			
	Fair Value	Valuation Techniques	Unobservable Input	Range (Weighted Average)
Assets:				
U.S. corporate[3]	$ 72	Discounted cash flows	Discount rate	3.6% - 22.8% (6.2%)
Non-agency ABS[3]	$ 661	Discounted cash flows	Discount rate	4.0% - 9.7% (4.8%)
Non-agency CMBS[3]	$ 96	Discounted cash flows	Discount rate	3.6% - 4.0% (3.8%)
Equity securities	$ 69	Market comparable	Revenue multiple	2.9x - 15.6x
Investments, at fair value of consolidated investment companies	$ 4,201	Market comparable	EBITDA multiple[1]	7.7x - 20.8x
		Discounted cash flows	Discount rate	5.8% - 13.0% (10.6%)
			Capitalization rate	4.8% - 7.8% (6.0%)
			Revenue growth rate	1.0%
			Terminal EBITA multiple	8.6x
Mortgage loans	$ 1,104	Discounted cash flows	Discount rate	3.9% - 5.8% (4.4%)
Reinsurance recoverable	$ 218	Discounted cash flows	Discount rate	2.7% - 6.9%
			Mortality rate	0.01% - 50.0%
			Lapse rate	1.5% - 97.0%
Liabilities:				
Future policy benefits	$ 926	Discounted cash flows	Discount rate	2.7% - 6.9%
			Mortality rate	0.01% - 50.0%
			Lapse rate	1.5% - 97.0%
Policyholders' account balances	$ 220	Discounted cash flows	Equity returns	2.0% - 7.3%
		GMAB	Equity volatility curve	19.1% - 47.6%
			Lapse rate	1.0% - 32.0%
			Mortality rate	0.0% - 50.0%
			Utilization rate	0.0% - 100.0%
			Withdrawal rate	2.5% - 8.3%
			Discount rate	3.0% - 7.4%
		Market value of assets	Mark to market[2]	3.3%
		IPG	Ratio of liabilities to assets by investment year	62.0% - 130.0% (97.4%)
			Realized capital gains	0.1%
			Assumed amortization period	5 years

[1] EBITDA multiple represents multiples of earnings before interest, taxes, depreciation and amortization, and are amounts used when the reporting entity has determined that market participants would use these multiples when pricing the investments.
[2] Information received from independent third-party valuation service providers.
[3] Includes both Available-for-sale and Securities at fair value.

Transfers between Levels

Transfers between levels may occur as a result of changes in valuation sources or changes in the availability of market observable inputs, which generally are caused by changes in market conditions such as liquidity, trading volume or bid-ask spreads. The Company’s policy is to assume the transfer occurs at the beginning of the year.

Transfers into and out of Level 3

The Company’s basis for transferring assets and liabilities into and/or out of Level 3 is based on the changes in the observability of data.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Assets and liabilities are transferred into Level 3 when a significant input cannot be corroborated with market observable data. This occurs when market activity decreases significantly and underlying inputs cannot be observed, current prices are not available, and/or when there are significant variances in quoted prices, thereby affecting transparency. Assets and liabilities are transferred out of Level 3 when circumstances change such that a significant input can be corroborated with market observable data. This may be due to a significant increase in market activity, a specific event, or one or more significant input(s) becoming observable.

During the years ended December 31, 2019 and 2018, the Company transferred $321 million and $630 million, respectively, of securities into Level 3 consisting of fixed maturities available-for-sale, fixed maturities securities at fair value, equity securities, and separate account assets. The transfers into Level 3 related to fixed maturities available-for-sale securities were primarily due to unobservable inputs utilized within valuation methodologies and the use of broker quotes (that could not be validated) when previously, information from third-party pricing services (that could be validated) was utilized.

Transfers out of Level 3 of $1 billion and $652 million during the years ended December 31, 2019 and 2018, respectively, were primarily due to significant increase in market activity, one or more significant input(s) becoming observable, or a change in the valuation technique for fixed maturities available-for-sale, fixed maturities securities at fair value, investments at fair value of consolidated investment companies, loans of certain consolidated VIEs, and separate account assets in 2019 and 2018.

The following table presents the changes in fair value of all Level 3 assets and liabilities for the years ended December 31, 2019 and 2018 (in millions):

	U.S. Government Corporations and Agencies	U.S. Agency MBS and ABS	Foreign Governments	U.S. Corporate	Foreign Corporate
Fair Value, December 31, 2017	$ 20	$ 2	$ 22	$ 170	$ 33
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	—	—	1	—
Other comprehensive income	—	—	—	(16)	(1)
Net investment income[1]	—	—	—	(2)	—
Purchases	—	—	—	86	2
Sales	—	(1)	—	(44)	(7)
Settlements	—	—	(3)	(36)	(3)
Transfers into Level 3[2]	—	—	—	35	43
Transfers out of Level 3[2]	—	—	—	(2)	(20)
Fair Value, December 31, 2018	$ 20	$ 1	$ 19	$ 192	$ 47
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	—	—	(4)	—
Other comprehensive income	—	—	—	7	—
Net investment income[1]	—	—	—	(1)	—
Purchases	—	—	—	41	3
Sales	—	—	—	(22)	(34)
Settlements	(20)	—	(9)	(32)	—
Transfers into Level 3[2]	—	—	—	129	—
Transfers out of Level 3[2]	—	—	—	(77)	(9)
Fair Value, December 31, 2019	$ —	$ 1	$ 10	$ 233	$ 7

[1] Net investment income includes amortization of discount and premium on fixed maturities.
[2] Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	Non-agency RMBS	Non-agency CMBS	Non-agency ABS	Total Fixed Maturities - Available - For - Sale
Fair Value, December 31, 2017	$ 16	$ 592	$ 1,478	$ 2,333
Total gains (losses) (realized/unrealized) included in:				
Net investment gains (losses)	—	—	—	1
Other comprehensive income	—	1	(17)	(33)
Net investment income[1]	—	—	—	(2)
Purchases	12	—	520	620
Sales	—	(8)	(102)	(162)
Settlements	(3)	(39)	(250)	(334)
Transfers into Level 3[2]	—	—	535	613
Transfers out of Level 3[2]	(8)	(20)	(556)	(606)
Fair Value, December 31, 2018	$ 17	$ 526	$ 1,608	$ 2,430
Total gains (losses) (realized/unrealized) included in:				
Net investment gains (losses)	—	—	1	(3)
Other comprehensive income	1	4	17	29
Net investment income[1]	—	—	—	(1)
Purchases	31	284	207	566
Sales	—	—	(240)	(296)
Settlements	—	(45)	(158)	(264)
Transfers into Level 3[2]	—	25	149	303
Transfers out of Level 3[2]	(5)	—	(901)	(992)
Fair Value, December 31, 2019	$ 44	$ 794	$ 683	$ 1,772

[1] Net investment income includes amortization of discount and premium on fixed maturities.
[2] Transfers into or out of Level 3 are reported at the value at the beginning of the year.

	Foreign Governments	U.S. Corporate	Foreign Corporate	Non-Agency RMBS	Non-Agency CMBS
Fair Value, December 31, 2017	$ 23	$ 72	$ 21	$ —	$ 22
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	(3)	(1)	—	—
Net investment income[1]	—	—	—	—	(2)
Purchases	—	—	—	1	—
Settlements	(6)	(4)	(3)	—	(4)
Transfers into Level 3[2]	—	—	—	—	—
Transfers out of Level 3[2]	—	(8)	(3)	—	(2)
Fair Value, December 31, 2018	$ 17	$ 57	$ 14	$ 1	$ 14
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	1	—	—	—
Net investment income[1]	—	—	—	—	—
Purchases	—	—	—	2	—
Settlements	(17)	(4)	—	—	(1)
Transfers into Level 3[2]	—	6	—	—	—
Transfers out of Level 3[2]	—	—	—	—	—
Fair Value, December 31, 2019	$ —	$ 60	$ 14	$ 3	$ 13

[1] Net investment income includes amortization of discount and premium on fixed maturities.
[2] Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	Non-Agency ABS	Total Fixed Maturities - Securities at Fair Value	Common Stock	Non-Redeemable Preferred Stock	Mutual Funds
Fair Value, December 31, 2017	$ 89	$ 227	$ 187	$ 47	$ 1
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	(15)	(19)	5	8	—
Other comprehensive income	—	—	—	(1)	—
Net investment income[1]	4	2	—	—	—
Purchases	26	27	67	8	—
Sales	—	—	(19)	(1)	—
Settlements	(15)	(32)	—	—	—
Transfers into Level 3[2]	6	6	6	—	2
Transfers out of Level 3[2]	(17)	(30)	—	—	(3)
Fair Value, December 31, 2018	$ 78	$ 181	$ 246	$ 61	$ —
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	(1)	—	(5)	6	—
Other comprehensive income	—	—	—	—	—
Net investment income[1]	—	—	—	—	—
Purchases	11	13	22	7	—
Sales	(1)	(1)	(40)	—	—
Issuances	—	—	—	—	—
Settlements	(10)	(32)	—	—	—
Transfers into Level 3[2]	11	17	—	—	—
Transfers out of Level 3[2]	(55)	(55)	(1)	—	—
Fair Value, December 31, 2019	$ 33	$ 123	$ 222	$ 74	$ —

(1) Net investment income includes amortization of discount and premium on fixed maturities.
(2) Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	Total Equity Securities	Mortgage Loans	Investments, at Fair Value, of Consolidated Investment Companies	Derivative Assets (Including Embedded)	Separate Account Assets
Fair Value, December 31, 2017	$ 235	$ 1,254	$ 3,449	$ 23	$ 3
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	13	(18)	187	(36)	1
Other comprehensive income	(1)	—	(5)	—	(1)
Net investment income(1)	—	(18)	46	—	—
Purchases	75	141	1,119	78	—
Sales	(20)	—	(578)	(15)	(3)
Settlements	—	(255)	—	—	
Transfers into Level 3(2)	8	—	—	—	3
Transfers out of Level 3(2)	(3)	—	(13)	—	—
Fair Value, December 31, 2018	$ 307	$ 1,104	$ 4,205	$ 50	$ 3
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	41	194	(45)	—
Other comprehensive income	—	—	—	—	—
Net investment income(1)	—	(9)	90	—	—
Purchases	29	243	897	3	—
Sales	(40)	—	(371)	—	—
Issuances	—	—	—	—	—
Settlements	—	(139)	—	—	—
Transfers into Level 3(2)	—	—	—	—	—
Transfers out of Level 3(2)	(1)	—	—	—	(3)
Fair Value, December 31, 2019	$ 295	$ 1,240	$ 5,015	$ 8	$ —

(1) Net investment income includes amortization of discount and premium on fixed maturities.
(2) Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	Reinsurance Recoverable	Limited Partnerships/ Limited Liability Companies	Total Assets	Policyholders' Account Balances	Future Policy Benefits
Fair Value, December 31, 2017	$ 3,700	$ 2	$ 11,226	$ 1,733	$ 8,326
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	—	129	—	(253)
Other comprehensive income	11	—	(29)	—	(35)
Net investment income[1]	—	—	28	(35)	—
Interest credited to policyholder account balance	12	—	12	(306)	—
Purchases	—	—	2,060	—	—
Sales	—	—	(778)	41	—
Settlements	(326)	—	(947)	(41)	(493)
Transfers into Level 3[2]	—	—	630	—	—
Transfers out of Level 3[2]	—	—	(652)	—	—
Fair Value, December 31, 2018	$ 3,397	$ 2	$ 11,679	$ 1,392	$ 7,545
Total gains (losses) (realized/unrealized) included in:					
Net investment gains (losses)	—	—	188	—	453
Other comprehensive income	7	—	37	—	23
Net investment income[1]	—	—	80	(124)	—
Interest credited to policyholder account balance	12	—	12	557	—
Purchases	17	(1)	1,763	—	—
Sales	—	—	(706)	45	—
Settlements	—	—	(436)	(33)	(203)
Transfers into Level 3[2]	—	—	321	—	—
Transfers out of Level 3[2]	—	—	(1,050)	—	—
Fair Value, December 31, 2019	$ 3,433	$ 1	$ 11,888	$ 1,837	$ 7,818

(1) Net investment income includes amortization of discount and premium on fixed maturities.
(2) Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	Dividends to Policyholders	Policy Claims	Debt	Reinsurance Payables	Derivative Liabilities	All other Liabilities	Total Liabilities
Fair Value, December 31, 2017	$ 73	$ 165	$ 291	$ 4,330	$ 148	$ 64	$ 15,130
Total gains (losses) (realized/ unrealized) included in:							
Net investment gains (losses)	—	—	—	(121)	6	(9)	(377)
Accretion of contingent liability	—	—	—	—	—	10	10
Interest credited to policyholder account balance	—	—	—	—	—	—	(306)
Other comprehensive income	—	—	—	—	—	—	(35)
Net investment income[1]	—	—	—	—	(42)	—	(77)
Purchases	—	—	—	—	—	3	3
Sales	—	—	—	—	—	—	41
Issuances	—	—	204	—	—	—	204
Settlements	(12)	(10)	(110)	(140)	—	(31)	(837)
Transfers into Level 3[2]	—	—	—	—	—	—	—
Transfers out of Level 3[2]	—	—	—	—	—	—	—
Fair Value, December 31, 2018	$ 61	$ 155	$ 385	$ 4,069	$ 112	$ 37	$ 13,756
Total gains (losses) (realized/ unrealized) included in:							
Net investment gains (losses)	—	—	—	208	(3)	21	679
Accretion of contingent liability	—	—	—	—	—	—	—
Interest credited to policyholder account balance	—	—	—	—	—	—	557
Other comprehensive income	—	—	—	—	—	—	23
Net investment income[1]	—	1	—	—	36	—	(87)
Purchases	—	—	—	—	2	—	2
Sales	—	—	—	—	—	(12)	33
Issuances	—	—	559	—	—	—	559
Settlements	(13)	(52)	(449)	(172)	(1)	1	(922)
Transfers into Level 3[2]	—	—	—	—	—	—	—
Transfers out of Level 3[2]	—	—	(1)	—	—	—	(1)
Fair Value, December 31, 2019	$ 48	$ 104	$ 494	$ 4,105	$ 146	$ 47	$ 14,599

(1) Net investment income includes amortization of discount and premium on fixed maturities.
(2) Transfers into or out of Level 3 are reported at the value at the beginning of the year.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

The following table includes the portion of gains and losses included in earnings attributable to unrealized gains or losses for the years ended December 31, 2019 and 2018 by category for Level 3 assets and liabilities still held at the end of each year (in millions):

	2019				
	U.S. Corporate	Non-Agency Asset-Backed Securities	Total Fixed Maturities - Available - For-Sale	U.S. Corporate	Non-Agency Asset-Backed Securities
Total gains (losses) (realized/unrealized) included in earnings:					
Net investment gains (losses)	$ (2)	$ 1	$ (1)	$ 1	$ 1
Interest credited to policyholders' account balances	—	—	—	—	—
Net investment income[(1)]	(2)	—	(2)	—	—
Total change in unrealized gains (losses)	$ (4)	$ 1	$ (3)	$ 1	$ 1

	Total Fixed Maturities - Securities at Fair Value	Non-Redeemable Preferred Stock	Mortgage Loans	Derivative Assets	Investments, at Fair Value, of Consolidated Investment Companies
Total gains (losses) (realized/unrealized) included in earnings:					
Net investment gains (losses)	$ 2	$ 6	$ 41	$ (46)	$ 102
Interest credited to policyholders' account balances	—	—	—	—	—
Net investment income[(1)]	—	—	(7)	—	—
Total change in unrealized gains (losses)	$ 2	$ 6	$ 34	$ (46)	$ 102

	Total Assets	Policyholders' Account Balances	Derivative Liabilities	Other Liabilities	Total Liabilities
Total gains (losses) (realized/unrealized) included in earnings:					
Net investment gains (losses)	$ 104	$ —	$ 3	$ 21	$ 24
Interest credited to policyholders' account balances	—	586	—	—	586
Net investment income[(1)]	(9)	—	—	—	—
Total change in unrealized gains (losses)	$ 95	$ 586	$ 3	$ 21	$ 610

(1) Net investment income includes amortization of discount and premium on fixed maturities.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

	2018				
	U.S. Corporate	Non-Agency ABS	Total Fixed Maturities - Available - for-Sale	U.S. Corporate	Non-Agency ABS
Total realized and unrealized gains or (losses) included in earnings:					
Net investment gains (losses)	$ (4)	$ —	$ (4)	$ (3)	$ (4)
Interest credited to policyholders' account balances	—	—	—	—	—
Net investment income(1)	(3)	—	(3)	—	—
Total change in unrealized gains (losses)	$ (7)	$ —	$ (7)	$ (3)	$ (4)

	Total Fixed Maturities - Securities at Fair Value	Non-Redeemable Preferred Stock	Mortgage Loans	Derivative Assets	Investments, at Fair Value, of Consolidated Investment Companies
Total realized and unrealized gains or (losses) included in earnings:					
Net investment gains (losses)	$ (7)	$ 7	$ (18)	$ (23)	$ 57
Interest credited to policyholders' account balances	—	—	—	—	—
Net investment income(1)	—	—	(13)	—	(1)
Total change in unrealized gains (losses)	$ (7)	$ 7	$ (31)	$ (23)	$ 56

	Total Assets	Policyholders' Account Balances	Derivative Liabilities	Other Liabilities	Total Liabilities
Total realized and unrealized gains or (losses) included in earnings:					
Net investment gains (losses)	$ 12	$ —	$ —	$ (9)	$ (9)
Interest credited to policyholders' account balances	—	(277)	—	—	(277)
Net investment income(1)	(17)	—	—	—	—
Total change in unrealized gains (losses)	$ (5)	$ (277)	$ —	$ (9)	$ (286)

(1) Net investment income includes amortization of discount and premium on fixed maturities.

Non-Recurring Fair Value Measurements

Assets and liabilities measured at fair value on a non-recurring basis include other invested assets and other assets, which are described in detail below.

The following tables represent certain assets measured at estimated fair value during the years ended and still held at December 31, 2019 and 2018 (in millions):

	2019			2018		
	Carrying Value Prior to Adjustments(1)	Estimated Fair Value After Adjustments(1)	Net Investment Losses	Carrying Value Prior to Adjustments(1)	Estimated Fair Value After Adjustments(1)	Net Investment Losses
Other invested assets	$ 20	$ 12	$ (8)	$ 19	$ 9	$ (10)
Mortgage loans	249	220	(29)	—	—	—
Other assets	117	73	(44)	2	—	(2)
Total assets	$ 386	$ 305	$ (81)	$ 21	$ 9	$ (12)

(1)Adjustments represent impairments and observable market price changes for certain equity securities under the measurement alternative.

Other invested assets consist of limited partnership investments that do not have a readily determinable fair value and are recorded at cost. These assets were impaired at December 31, 2019.

Mortgage loans consist of one commercial mortgage loan which was deemed impaired and written down to fair value at December 31, 2019.

NOTE 9 – FAIR VALUE MEASUREMENTS (continued)

Other assets consists of intangible assets that were impaired and written down to fair value at September 30 of any given year. Refer to Note 15 - Goodwill and Other Intangible Assets for further details.

For a description of the Company's valuation processes and controls, refer to the Determination of Fair Value section of this note above.

NOTE 10 - INVESTMENT INCOME AND INVESTMENT GAINS AND LOSSES, AND MANAGEMENT FEES AND OTHER INCOME

The components of Net investment income for the years ended December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Fixed maturities	$ 8,444	$ 8,073
Equity securities	92	101
Mortgage loans and other loans	2,191	1,942
Policy loans	661	644
Limited partnerships and other invested assets	553	745
Real estate	453	410
All other investment income	302	259
Gross investment income	12,696	12,174
Investment expenses	(671)	(695)
Net investment income	$ 12,025	$ 11,479

For the years ended December 31, 2019 and 2018, Net investment gains (losses) were as follows (in millions):

	2019	2018
Fixed maturities:		
Total OTTI losses	$ (161)	$ (95)
Portion of OTTI losses recognized in OCI	32	32
Net OTTI losses on fixed maturities recognized in earnings	(129)	(63)
All other gains (losses)	2,003	(1,173)
Total fixed maturities, net	1,874	(1,236)
Equity securities	517	(316)
Real estate	59	60
Limited partnerships and other invested assets	268	60
Derivative instruments	262	313
Foreign exchange	(88)	168
All other gains (losses)		(24)
Net investment gains (losses)	$ 2,892	$ (975)

The net investment gains (losses) on securities at fair value (both fixed maturities and equity securities) amounted to $2,295 million and $(1,470) million for the years ended December 31, 2019 and 2018, respectively. Of these net investment gains (losses), $2,162 million of gains and $(1,569) million of losses were related to changes in fair value still held at period end for the years ended December 31, 2019 and 2018, respectively.

Realized gains on sales of available-for-sale fixed maturities were $172 million and $183 million for the years ended December 31, 2019 and 2018, respectively, and realized losses were $50 million and $136 million, respectively. There were $10 million of realized gains on available-for-sale equity securities for the year ended December 31, 2019, and there were no realized gains or losses for the year ended December 2018.

NOTE 10 – INVESTMENT INCOME AND INVESTMENT GAINS AND LOSSES, AND MANAGEMENT FEES AND OTHER INCOME (continued)

The following table presents the Company's gross unrealized losses and fair values for fixed maturities, aggregated by investment category and length of time the individual securities have been in a continuous unrealized loss position, at December 31, 2019 and 2018 (in millions):

	2019					
	Less than 12 months		12 Months or Greater		Total	
Fixed Maturities	Fair Value	Unrealized Losses	Fair Value	Unrealized Losses	Fair Value	Unrealized Losses
U.S. Treasury	$ 430	$ 8	$ 119	$ —	$ 549	$ 8
U.S. government corporations &	43	—	50	—	93	—
U.S. agency MBS and ABS	2,765	32	1,054	31	3,819	63
Foreign governments	487	15	51	2	538	17
U.S. corporate	3,917	94	1,304	38	5,221	132
Bonds from subsidiaries and affiliates	—	—	—	—	—	—
Foreign corporate	748	42	610	25	1,358	67
Non-agency RMBS	378	10	121	3	499	13
Non-agency CMBS	1,383	11	432	4	1,815	15
Non-agency ABS	2,607	16	3,020	29	5,627	45
Total fixed maturities	$ 12,758	$ 228	$ 6,761	$ 132	$ 19,519	$ 360

	2018					
	Less than 12 months		12 Months or Greater		Total	
Fixed Maturities	Fair Value	Unrealized Losses	Fair Value	Unrealized Losses	Fair Value	Unrealized Losses
U.S. Treasury	$ 27	$ —	$ 401	$ 14	$ 428	$ 14
U.S. government corporations & agencies	86	2	303	12	389	14
U.S. agency MBS and ABS	4,995	109	9,720	514	14,715	623
Foreign governments	1,201	51	494	22	1,695	73
U.S. corporate	39,248	1,367	15,680	979	54,928	2,346
Foreign corporate	9,386	330	3,388	204	12,774	534
Non-agency RMBS	1,064	16	213	8	1,277	24
Non-agency CMBS	4,053	58	4,542	195	8,595	253
Non-agency ABS	6,896	116	2,893	75	9,789	191
Total fixed maturities	$ 66,956	$ 2,049	$ 37,634	$ 2,023	$ 104,590	$ 4,072

At December 31, 2019, the unrealized losses amount consisted of approximately 1,956 different fixed maturities.

Unrealized losses on investment grade fixed maturities were $266 million or 74% of the Company's total fixed maturities unrealized losses at December 31, 2019. Investment grade is defined as a security having a credit rating from the National Association of Insurance Commissioners ("NAIC") of 1 or 2; a rating of Aaa, Aa, A, or Baa from Moody's or a rating of AAA, AA, A, or BBB from Standard & Poor's ("S&P") and Fitch; or a comparable internal rating if an externally provided rating is not available. Unrealized losses on fixed maturities with a rating below investment grade were $94 million or 26% of the Company's total fixed maturities unrealized losses at December 31, 2019.

NOTE 10 – INVESTMENT INCOME AND INVESTMENT GAINS AND LOSSES, AND MANAGEMENT FEES AND OTHER INCOME (continued)

The amount of gross unrealized losses for fixed maturities where the fair value had declined by 20% or more of amortized cost totaled $15 million. The amount of time that each of these securities has continuously been 20% or more below the amortized cost consist of $11 million for 6 months or less, $1 million for greater than 6 months through 12 months, and $3 million for greater than 12 months. In accordance with the Company's impairment policy, the Company performed quantitative and qualitative analysis to determine if the decline was temporary. For those securities where the decline was considered temporary, the Company did not take an impairment when it did not have the intent to sell the security or it was more likely than not that it would not be required to sell the security before its anticipated recovery.

Net Unrealized Investment Gains or Losses

Net unrealized investment gains or losses on available-for-sale investments are included in the accompanying Consolidated Statements of Financial Position as a component of AOCI. Changes in these amounts include reclassification adjustments for prior period net unrealized gains or losses that have been recognized as realized gains or losses during the current year and are included in Net investment gains (losses) in the accompanying Consolidated Statements of Operations.

The components of Net unrealized investment gains (losses) reported in AOCI at December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Fixed maturities - all other	$ 13,700	$ 1,610
Fixed maturities on which an OTTI loss has been recognized	146	117
Total fixed maturities	13,846	1,727
Derivatives designated as cash flow hedges	149	168
Other investments	115	18
Subtotal	14,110	1,913
Amounts recognized for:		
Deferred policy acquisition costs	(1,852)	(47)
Sales inducements	(6)	1
Future policy benefits and Policyholders' account balances	(1,006)	(786)
Deferred income taxes	(2,417)	(261)
Net unrealized gains on investments	$ 8,829	$ 819

NOTE 10 – INVESTMENT INCOME AND INVESTMENT GAINS AND LOSSES, AND MANAGEMENT FEES AND OTHER INCOME (continued)

The net unrealized gains or losses for the years ended December 31, 2019 and 2018 are presented separately for amounts related to fixed maturities on which an OTTI loss has been recognized, and all other net unrealized investment gains or losses, are as follows (in millions):

Net unrealized investment gains and losses on fixed maturities on which an OTTI loss has been recognized

	Net Unrealized Gains (Losses) On Investments	DAC	Sales Inducements	Policyholders' Account Balances and Future Policy Benefits	Deferred Tax Asset (Liability)	AOCI (Loss) Related To Net Unrealized Investment Gains (Losses)
Balance, December 31, 2017	$ 169	$ (28)	$ —	$ 9	$ (28)	$ 121
Net investment gains (losses) on investments arising during the period	(60)	—	—	—	12	(48)
Reclassification adjustment for (gains) losses included in net income	10	—	—	—	(2)	8
Impact of net unrealized investment (gains) losses on deferred policy acquisition costs and sales inducements	—	7	—	1	(2)	6
Balance, December 31, 2018	$ 119	$ (21)	$ —	$ 10	$ (19)	$ 87
Net investment gains (losses) on investments arising during the period	25	—	—	—	(10)	15
Reclassification adjustment for (gains) losses included in net income	(4)	—	—	—	1	(3)
Reclassification adjustment for OTTI losses excluded from net income[(1)]	6	—	—	—	(1)	5
Impact of net unrealized investment (gains) losses on deferred policy acquisition costs and sales inducements	—	7	—	(11)	1	(3)
Balance, December 31, 2019	$ 146	$ (14)	$ —	$ (1)	$ (28)	$ 103

(1) Represents "transfers out" related to the portion of OTTI losses and/or changes in non-credit losses recognized during the period that were not recognized in earnings for securities with no prior OTTI loss.

All other net unrealized investment gains and losses

	Net Unrealized Gains (Losses) On Investments[(1)]	DAC	Sales Inducements	Policyholders' Account Balances and Future Policy Benefits	Deferred Tax Asset (Liability)	AOCI (Loss) Related To Net Unrealized Investment Gains (Losses)
Balance, December 31, 2017	$ 9,028	$ (1,120)	$ (6)	$ (1,231)	$ (1,472)	$ 5,199
Change in accounting principle - reclass of stranded tax effects	(19)	—	—	(39)	12	(45)
Net investment gains (losses) on investments arising during the period	(7,239)	—	—	—	1,554	(5,685)
Reclassification adjustment for (gains) losses included in net income[(2)]	24	—	—	—	(5)	19
Impact of net unrealized investment (gains) losses on deferred policy acquisition costs and sales inducements	—	1,094	7	—	(233)	868
Impact of net unrealized investment (gains) losses on policyholders' account balances and future policy benefits	—	—	—	474	(98)	376
Balance, December 31, 2018	$ 1,794	$ (26)	$ 1	$ (796)	$ (242)	$ 732
Net investment gains (losses) on investments arising during the period	12,259	—	—	—	(2,598)	9,661
Reclassification adjustment for (gains) losses included in net income	(83)	—	—	—	18	(65)
Reclassification adjustment for (gains) losses excluded in net income	(6)	—	—	—	1	(5)
Impact of net unrealized investment (gains) losses on deferred policy acquisition costs and sales inducements	—	(1,812)	(7)	—	374	(1,445)
Impact of net unrealized investment (gains) losses on policyholders' account balances and future policy benefits	—	—	—	(209)	58	(151)
Balance, December 31, 2019	$ 13,964	$ (1,838)	$ (6)	$ (1,005)	$ (2,389)	$ 8,726

(1) Includes cash flow hedges. Refer to Note 7 - Derivative Instruments and Risk Management for information on cash flow hedges.
(2) Represents "transfers out" related to the portion of OTTI losses and/or changes in non-credit losses recognized during the period that were not recognized in earnings for securities with no prior OTTI loss.

NOTE 10 – INVESTMENT INCOME AND INVESTMENT GAINS AND LOSSES, AND MANAGEMENT FEES AND OTHER INCOME (continued)

The following table provides a rollforward of the cumulative credit loss component of OTTI losses recognized in earnings for fixed maturities still held, for which a portion of the loss was recognized in AOCI (in millions):

	2019	2018
Balance at beginning of year	$ 354	$ 357
Additions:		
Credit loss impairments recognized in the current year on securities previously not impaired	1	5
Additional credit loss impairments recognized in the current year on securities previously impaired	6	19
Reductions:		
Credit loss impairments previously recognized on securities which matured, paid down, prepaid or sold during the year	(30)	(27)
Balance at end of year	$ 331	$ 354

Management Fees and Other Income

The table below presents Management fees and other income predominantly related to investment management activities at December 31, 2019 and 2018 (in millions):

	2019	2018
Asset management fees	$ 1,186	$ 1,165
Distribution fees	173	182
Service fees	71	80
Other	96	146
Total management fees and other income	$ 1,526	$ 1,573

NYL Investments Management Holdings LLC ("NYL Investments"), through its subsidiaries, is responsible for providing investment advisory and certain related administrative services to certain mutual funds and separately managed accounts it manages on behalf of the Company. As a result, NYL Investments, through its subsidiaries, earns investment management, accounting, administration, and service fees related to these activities, which aggregated to $1,015 million and $1,020 million for the years ended December 31, 2019 and 2018, respectively, and are included in Management fees and other income in the accompanying Consolidated Statements of Operations.

NOTE 11 - POLICYHOLDERS' LIABILITIES

Future Policy Benefits

Future policy benefits at December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Life insurance(1)	$ 89,665	$ 85,862
Individual and group payout annuities	34,769	31,960
Long-term care	2,606	2,392
Group pensions	2,378	2,017
Other contract liabilities	2,058	1,297
Total future policy benefits	$ 131,476	$ 123,528

(1) Includes benefits held at fair value of $7,818 million and $7,545 million at December 31, 2019 and 2018, respectively.

NOTE 11 - POLICYHOLDERS' LIABILITIES (continued)

Participating life insurance contracts represented 81% of total life insurance in-force for both of the years ended December 31, 2019 and 2018. Participating life insurance premiums also represented 87% and 88% of total life insurance premiums for the years ended December 31, 2019 and 2018, respectively.

The following table highlights the key assumptions generally utilized in the calculation of liabilities for future policy benefits at December 31, 2019:

Products	Mortality	Interest Rates	Estimation Method
Traditional permanent life insurance and endowment contracts	Rates guaranteed in calculating cash surrender values	0.00% to 5.75%	Net level premium
Term life insurance	Based upon best estimates at time of policy issuance with PAD	0.25% to 7.70%	Net level premium reserve taking into account death benefits, lapses and maintenance expenses with PAD
Individual and group payout annuities	Based upon best estimates at time of policy issuance with PAD, or for structured settlement contracts issued by New York Life prior to 2018, the 2017 best estimate mortality without PAD due to reserve unlocking	2.00% to 9.50%	Present value of expected future payments at a rate expected at issue with PAD, or for structured settlement contracts issued by New York Life prior to 2018, at 2017 expected portfolio rates without PAD due to reserve unlocking
Long-term care	1983 IAM for 1988-1996 Issues 1983 GAM for 1997-2006 Issues 1994 GAM for 2007-2016 Issues 2012 IAM for 2017 and later Issues	3.70% to 7.75%	Net level premium
Group pensions	1983 Group Annuity Mortality Tables for policies issued prior to 1993 and best estimates for policies issued thereafter	1.95% to 9.50%	Present value of expected future payments at rates expected at issue, or for policy issuance prior to 1993 at the then expected portfolio rates

Policyholders' Account Balances

Policyholders' account balances at December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Deferred annuities	$ 46,966	$ 47,106
Universal life contracts	30,638	29,542
Guaranteed investment contracts (including funding agreements)	32,351	30,661
IPG contracts	8,434	7,637
Other[1]	5,115	5,008
Total policyholders' account balances	$ 123,504	$ 119,954

[1] Includes balances held at fair value of $1,837 million and $1,392 million at December 31, 2019 and 2018, respectively.

Guaranteed investment contracts issued by the Company include MTN liabilities at December 31, 2019 and 2018 of $16,584 million and $14,514 million, respectively.

The Company has entered into funding agreements with the FHLB of NY, whereby the Company has issued such funding agreements in exchange for cash. The funding agreements with the FHLB of NY of $2,832 million and $3,584 million at December 31, 2019 and 2018, respectively, are included in guaranteed investment contracts. When a funding agreement is issued, the Company is then required to post collateral in the form of eligible securities including mortgage-backed, government and agency debt instruments for each of the advances that are entered. Upon any event of default by the Company, the FHLB's recovery on the collateral is limited to the amount of the Company's liability to the FHLB. The proceeds are used for spread lending purposes.

NOTE 11 - POLICYHOLDERS' LIABILITIES (continued)

New York Life Insurance and Annuity Corporation ("NYLIAC"), a direct wholly owned subsidiary of New York Life, is a member of the FHLB of Pittsburgh. At December 31, 2019 and 2018, the Company had no funding advances outstanding.

The following table represents FHLB balances at December 31, 2019 and 2018 (in millions):

	Member	Common Stock[1]		Fair Value of Collateral		Maximum Capacity Amount	
		2019	2018	2019	2018	2019	2018
FHLB - NY	NYLIC	$ 174	$ 202	$ 4,324	$ 4,674	$ 8,832	$ 8,349
FHLB - Pittsburgh	NYLIAC	$ 28	$ 28	$ —	$ —	$ 5,302	$ 5,071

[1] FHLB common stock includes membership and active stock and is included in equity securities, available for sale.

The following table highlights the interest rate assumptions utilized in calculating Policyholders' account balances at December 31, 2019:

Products	Interest Rates
Deferred annuities	0.05% to 10.00%
Universal life contracts	2.10% to 4.50%
Guaranteed investment contracts (including funding agreements)	0.25% to 5.47%
IPG contracts	3.50% to 6.62%

Guaranteed Minimum Benefits

At December 31, 2019 and 2018, the Company had fixed and variable annuities with guarantees. The Company's variable annuities with guarantees may offer more than one type of guarantee in each contract; therefore, the amounts listed are not mutually exclusive. For guarantees of amounts in the event of death, the net amount at risk is defined as the current GMDB in excess of the current account balance at the balance sheet date. For contracts with the EBB optional feature, the net amount at risk is defined as the additional benefit amount that is equal to a percentage of earnings in the contract, subject to certain maximums. For guarantees of accumulation balances, the net amount at risk is defined as the GMAB minus the current account balance at the balance sheet date. For GFIB, the net amount at risk is defined as the minimum account balance in excess of the current account balance needed to fund the guaranteed income. For guaranteed lifetime income withdrawal benefits ("GLWB"), the net amount at risk represents the income base, as defined, in excess of the account value at the balance sheet date.

Variable Annuity Contracts – GMDB, EBB, GMAB and GFIB

The Company issues certain variable annuity contracts with a GMDB feature that guarantees either:

a) Return of deposits: the benefit is the greater of current account value or premiums paid (adjusted for withdrawals).

b) Ratchet: the benefit is the greatest of the current account value, premiums paid (adjusted for withdrawals), or the highest account value on any contractually specified anniversary up to contractually specified ages (adjusted for withdrawals).

Contracts with an optional EBB feature provide an additional death benefit equal to a percentage of earnings in the contract at the time of death, subject to certain maximum thresholds.

The Company issues certain variable annuity contracts with a GMAB feature that guarantees a minimum contract value at the end of the guarantee period equal to 100% or 150% of initial premium (adjusted for withdrawals), depending on the length of the guarantee period selected at issue. The minimum contract value can be reset after issue, and in such case, is set equal to the account value at the time of reset and the guaranteed period starts over. Older contracts must

NOTE 11 - POLICYHOLDERS' LIABILITIES (continued)

be surrendered in order to receive the minimum contract value. New policies may pay out the higher of the GMDB and GMAB amount upon death, depending on the age of the contract and the guaranteed period selected.

The Company issues variable annuity contracts with a GFIB feature. This feature provides a minimum fixed annuity payment guarantee that will start on a date chosen by the policyholder.

The following table provides the account value, net amount at risk and average attained age of contract holders at December 31, 2019 and 2018 for GMDBs, GMABs, EBBs, and GFIBs ($ in millions):

	2019					
	Return of Net Deposits			Ratchet		Income
	In the Event of Death (GMDB)	Accumulation at Specified Date (GMAB)	Additional Death Benefits (EBB)	In the Event of Death (GMDB)	In the Event of Death (GMAB)	Accumulation at Specified Date (GFIB)
Account value	$ 24,359	$ 6,991	$ 47	$ 8,964	$ 1,330	$ 165
Net amount at risk	$ 14	$ 72	$ 7	$ 71	$ 11	$ —
Average attained age of contract holders	60	60	71	66	63	61

	2018					
	Return of Net Deposits			Ratchet		Income
	In the Event of Death (GMDB)	Accumulation at Specified Date (GMAB)	Additional Death Benefits (EBB)	In the Event of Death (GMDB)	In the Event of Death (GMAB)	Accumulation at Specified Date (GFIB)
Account value	$ 20,295	$ 5,916	$ 43	$ 8,482	$ 1,275	$ 175
Net amount at risk	$ 184	$ 205	$ 5	$ 528	$ 38	$ —
Average attained age of contract holders	59	59	70	65	63	61

The following summarizes the general account liabilities for guarantees on variable contracts included in liabilities for Future policy benefits for GMDB, EBB, and GFIB, and liabilities for Policyholders' account balances for GMAB in the accompanying Consolidated Statements of Financial Position (in millions):

	GMDB	GMAB	EBB	GFIB	Total
Balance, December 31, 2017	$ 46	$ 33	$ 2	$ 3	$ 84
Incurred guaranteed benefits	4	7	—	—	11
Paid guaranteed benefits	(3)	(4)	—	—	(7)
Balance, December 31, 2018	$ 47	$ 36	$ 2	$ 3	$ 88
Incurred guaranteed benefits	48	(79)	—	1	(30)
Paid guaranteed benefits	(2)	(1)	—	—	(3)
Balance, December 31, 2019	$ 93	$ (44)	$ 2	$ 4	$ 55

For GMABs, incurred guaranteed minimum benefits incorporate all changes in fair value other than amounts resulting from paid guaranteed benefits. GMABs are considered to be embedded derivatives and are recognized at fair value through interest credited to policyholders' account balances (refer to Note 9 - Fair Value Measurements).

The GMDB and EBB liabilities are determined each period end by estimating the expected value of death benefits in excess of the projected account balance and recognizing the excess ratably over the accumulation period based on total expected assessments in accordance with applicable guidance. The Company regularly evaluates assumptions and adjusts the additional liability, with a related charge or credit to Increase in liabilities for future policy benefits in the

NOTE 11 - POLICYHOLDERS' LIABILITIES (continued)

accompanying Consolidated Statements of Operations, if actual experience or other evidence suggests that earlier assumptions should be revised.

The GFIB liability is determined each period end by estimating the expected guaranteed minimum income benefit amounts less the benefit amounts funded by income benefit purchases, and recognizing the excess ratably over the accumulation period based on total expected assessments in accordance with applicable guidance. The Company regularly evaluates estimates used and adjusts the additional liability balance, with a related charge or credit to Increase in liabilities for Future policy benefits in the accompanying Consolidated Statements of Operations, if actual experience or other evidence suggests that earlier assumptions should be revised.

The following table presents the aggregate fair value of assets at December 31, 2019 and 2018, by major investment fund options (including the general and separate account fund options), held by annuity products that are subject to GMDB, GMAB, EBB and GFIB benefits and guarantees. Since variable contracts with GMDB guarantees may also offer GMAB, GFIB and EBB guarantees in each contract, the GMDB, GMAB, EBB and GFIB amounts listed are not mutually exclusive (in millions):

	2019			
	GMDB	GMAB	EBB	GFIB
Separate account:				
Equity	$ 16,807	$ 4,270	$ 25	$ 97
Fixed income	7,173	2,186	10	47
Balanced	5,789	1,617	8	22
Total separate account	29,769	8,073	44	165
General account	3,554	248	3	—
Total	$ 33,323	$ 8,321	$ 47	$ 165

	2018			
	GMDB	GMAB	EBB	GFIB
Separate account:				
Equity	$ 14,008	$ 3,699	$ 23	$ 101
Fixed income	6,510	1,994	10	51
Balanced	4,863	1,308	7	23
Total separate account	25,381	7,001	40	175
General account	3,396	190	3	—
Total	$ 28,777	$ 7,191	$ 43	$ 175

Fixed Annuity Contracts – GLWB

The Company issues fixed annuity contracts with a GLWB feature. The benefit must be elected at the time of contract issuance, and provides for a percentage of the contract holder's benefit base, subject to certain restrictions, to be available for withdrawal for life as early as age 59 1/2. This benefit base grows for up to 10 years or until lifetime income payments commence, whichever comes first.

The GLWB liability is determined each period end by estimating the expected payments after the account balance is depleted and recognizing the excess ratably over the accumulation period based on total expected assessments in accordance with applicable guidance. The Company regularly evaluates estimates used and adjusts the additional liability balance, with a related charge or credit to Increase in liabilities for future policy benefits in the accompanying Consolidated Statements of Operations, if actual experience or other evidence suggests that earlier assumptions should be revised.
The GLWB liability was $214 million and $89 million at December 31, 2019 and 2018, respectively.

NOTE 11 - POLICYHOLDERS' LIABILITIES (continued)

Additional Liability for Individual Life Products

Certain individual life products require additional liabilities for contracts with excess insurance benefit features. These excess insurance benefit features are generally those that result in profits in early years and losses in subsequent years. For the Company's individual life contracts, this requirement primarily affects universal life policies with secondary guarantees. For these policies, we define excess insurance benefits as death benefits paid in excess of account balance released on death when the policy is either being held in-force by the presence of a no lapse guarantee or when an amount in excess of the account balance results from a GMDB.

Generally, the Company has separately defined an excess insurance benefit to exist when expected mortality exceeds all assessments. This insurance benefit is in addition to the base mortality feature, which the Company defines as expected mortality not in excess of assessments. The liability for excess insurance benefit features reflected in the general account and included in liabilities for Future policy benefits in the accompanying Consolidated Statements of Financial Position was $322 million and $239 million at December 31, 2019 and 2018, respectively.

NOTE 12 - DEFERRED POLICY ACQUISITION COSTS AND SALES INDUCEMENTS

Deferred Policy Acquisition Costs

The following is a rollforward of DAC for the years ended December 31, 2019 and 2018 (in millions):

	2019	2018
Balance at beginning of year	$ 8,313	$ 6,985
Current year additions	1,418	1,407
Amortization - current year	(1,278)	(1,069)
Amortization - impact of assumption and experience unlocking	(10)	(127)
Balance at end of year before related adjustments	8,443	7,196
Adjustment for changes in unrealized net investment gains (losses)	(1,752)	1,100
Cumulative translation adjustment	27	17
Balance at end of year	$ 6,718	$ 8,313

Sales Inducements

The following is a rollforward of deferred sales inducements included in Other assets in the accompanying Consolidated Statements of Financial Position for the years ended December 31, 2019 and 2018 (in millions):

	2019	2018
Balance at beginning of year	$ 582	$ 631
Current year additions	45	51
Amortization - current year	(92)	(85)
Amortization - impact of assumption and experience unlocking	2	(21)
Balance at end of year before related adjustments	537	576
Adjustment for changes in unrealized net investment gains (losses)	(7)	6
Balance at end of year	$ 530	$ 582

NOTE 13 – REINSURANCE

The Company enters into reinsurance agreements in the normal course of its insurance business to reduce overall risk and to be able to issue life insurance policies in excess of its retention limits. The Company also participates in assumed reinsurance with third parties in acquiring additional business.

Reinsurance premiums, commissions, expense reimbursements, benefits and reserves related to reinsured long-duration contracts under coinsurance arrangements are accounted for over the life of the underlying reinsured contracts using assumptions consistent with those used to account for the underlying contracts. Generally, the Company does not have any individual life or group life ceded reinsurance agreements that do not transfer risk or contain risk limiting features.

The effects of reinsurance assumed and ceded on the accompanying Consolidated Statements of Operations for the years ended December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Direct	$ 16,113	$ 14,598
Assumed	805	993
Ceded	(601)	(589)
Premiums	$ 16,317	$ 15,002
Fees - universal life and annuity policies ceded	$ (484)	$ (472)
Direct	$ 10,555	$ 10,226
Assumed	1,183	1,193
Ceded	(1,251)	(1,190)
Policyholders' benefits	$ 10,487	$ 10,229
Direct	$ 7,186	$ 5,863
Assumed	252	(756)
Ceded	(88)	263
Increase in liabilities for future policy benefits	$ 7,350	$ 5,370
Direct	$ 1,955	$ 1,909
Assumed	100	96
Ceded	(46)	(43)
Dividends to policyholders	$ 2,009	$ 1,962

The effects of reinsurance on the accompanying Consolidated Statements of Financial Position for the years ended December 31, 2019 and 2018 were as follows (in millions):

	2019	2018
Reinsurance recoverable[(1)]	$ 5,723	$ 5,632
Future policy benefits assumed	$ 7,818	$ 7,545
Policyholder's account balances assumed	$ 1,110	$ 1,172
Reinsurance payable[(1)]	$ 4,218	$ 4,178

[(1)] Reinsurance recoverable is reported in Other assets and Reinsurance payable is recorded in Other liabilities in the accompanying Consolidated Statements of Financial Position.

NOTE 13 - REINSURANCE (continued)

Assumed Reinsurance

The Company assumes, on a coinsurance basis, 100% of the obligations and liabilities of John Hancock Life Insurance Company (U.S.A.) and one of its affiliates ("John Hancock") closed block life insurance policies ("Closed Block"). The Company retrocedes 40% of those obligations and liabilities to John Hancock on a funds-withheld arrangement, resulting in a net 60% quota share reinsurance.

The assets received from this transaction are pledged as collateral and are contractually restricted, the majority of which are permanently restricted and must be passed back to the reinsured policyholders as a future benefit or dividend payment. The Company elected the FVO for the reinsurance obligations and liabilities and the permanently restricted assets because it is a better match with the economics of the transaction since the permanently restricted assets inure to the reinsured policies.

The contractually restricted assets within the accompanying Consolidated Statements of Financial Position at December 31, 2019 and 2018, were as follows (in millions):

	2019	2018
Fixed maturities:		
Available for sale, at fair value	$ 1,475	$ 1,477
Securities at fair value	6,103	6,104
Mortgage loans, at fair value	1,240	1,104
Policy loans	1,104	1,139
Other investments	1	3
Total investments	9,923	9,827
Cash and cash equivalents	101	99
Investment income due and accrued	110	119
Other assets	48	45
Total contractually restricted assets[1]	$ 10,182	$ 10,090

[1] Includes $8,690 million and $8,601 million of permanently restricted assets and $1,492 million and $1,489 million in case the permanently restricted assets are not sufficient to meet policyholder liabilities at December 31, 2019 and 2018, respectively.

At December 31, 2019 and 2018, the Company recorded liabilities for Future policy benefits of $7,818 million and $7,545 million, respectively, and other liabilities of $1,296 million and $1,394 million, respectively. At December 31, 2019 and 2018, for the portion retro ceded, the Company recorded amounts recoverable of $3,433 million and $3,397 million respectively, other assets of $39 million and $40 million, respectively, and a funds withheld-liability of $4,105 million and $4,069 million, respectively. Refer to Note 9 - Fair Value Measurements, for a discussion on the valuation of these items. Under new authoritative guidance in 2018 for financial instruments, changes in the fair value of a liability under the FVO related to the liability's specific credit risk, are reported in OCI with all other changes reported in earnings. The Company's process for isolating the component of the change in fair value of the liabilities related to the Company's own credit risk includes, among other things, comparing the Company's current credit spreads versus credit spreads at origination of the transaction. For the year ended December 31, 2019 and December 31, 2018, the loss in the fair value of the Closed Block liabilities related to the liabilities' specific credit risk reported in OCI was $12 million. The cumulative impact recorded in OCI was a loss of $15 million and a gain of $19 million, net of deferred taxes, at December 31, 2019 and 2018, respectively.

The insurance related revenue, primarily premiums, and net investment income from the permanently restricted assets, accrue solely to the benefit of those reinsured policyholders and increase the liabilities for future policy benefits with zero impact to the Net income attributable to New York Life in the accompanying Consolidated Statements of Operations.

NOTE 13 - REINSURANCE (continued)

Ceded Reinsurance

The Company reinsures the mortality risk on new life insurance policies on an automatic quota-share yearly renewable term basis for many products, except for whole life, custom guarantee universal life, survivorship custom guarantee universal life and asset flex products. For new life insurance policies reinsured automatically, the Company cedes between 25% and 90% of each risk, with a minimum size policy that ranges from $0 to $2 million, depending upon the product. Cases in excess of the Company's retention and certain substandard cases are ceded on a facultative reinsurance basis. The majority of the Company's facultative reinsurance is for substandard cases in which it typically cedes 90%.

The Company remains liable for reinsurance ceded if the reinsurer fails to meet its obligation on the business it has assumed. The Company periodically reviews the financial condition of its reinsurers and amounts recoverable in order to minimize its exposure to loss from reinsurer insolvencies. If necessary, an allowance would be recorded for reinsurance that the Company cannot collect.

The Company no longer writes individual medical and disability income coverage. The individual disability income policies are reinsured 100% with Unum Group on a modified coinsurance basis. The individual medical and Medicare Supplement coverage are reinsured 40% and 90%, respectively, with Mutual of Omaha.

Prior to July 1, 2002, NYLIAC did business in Taiwan through a branch operation (the "Taiwan Branch"). On July 1, 2002, the Taiwan Branch ceased operations and all of its liabilities and assets were transferred to New York Life Insurance Taiwan Corporation ("Taiwan Corporation"), an indirect subsidiary of New York Life that was sold to Yuanta Financials Holding Co., Ltd. ("Yuanta") on December 31, 2013. Under the terms of the sale agreement, Yuanta agreed to satisfy in full, or cause Taiwan Corporation to satisfy in full, all of Taiwan Corporation's obligations under the Taiwan Branch policies that were transferred to Taiwan Corporation on July 1, 2002. The Company accounts for the policies issued prior to July 2002 as 100% coinsured, and included $1,614 million and $1,533 million of policyholder liabilities associated with those policies at December 31, 2019 and 2018, respectively, as well as a reinsurance recoverable asset from Taiwan Corporation/Yuanta of an equal amount in its accompanying Consolidated Statements of Financial Position.

The Company ceded 16% and 14% of its total life insurance in-force for the years ended December 31, 2019 and 2018, respectively.

Four reinsurance companies account for 71% and 75% of the life insurance in-force ceded at December 31, 2019 and 2018.

NOTE 14 - BENEFIT PLANS

Defined Benefit Plans

New York Life maintains various tax-qualified and non-qualified defined benefit pension plans covering eligible U.S. employees and agents. The tax-qualified plan for employees includes both a traditional formula and a cash balance formula. The applicability of these formulas to a particular plan participant is generally determined by age and date of hire. Under the traditional formula, benefits are based on final average earnings and length of service. The cash balance formula credits employees' accounts with a percentage of eligible pay each year based on years of service, along with annual interest credits at rates based on IRS guidelines. Benefits under the tax-qualified plan for agents are based on length of service and earnings during an agent's career. The non-qualified pension plans provide supplemental benefits in excess of the maximum benefits applicable to a tax-qualified plan.

The tax-qualified defined benefit pension plans of New York Life are funded solely by Company contributions. New York Life's funding policy is to make annual contributions that are no less than the minimum amount needed to comply with the requirements of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and the IRC of 1986, as amended, and no greater than the maximum amount deductible for federal income tax purposes. In 2019, New York Life did not make any voluntary contributions to the tax-qualified plans. In 2018, New York Life made

NOTE 14 – BENEFIT PLANS (continued)

voluntary contributions to the tax-qualified plans for employees and agents of $300 million and $200 million, respectively. No contributions were required to satisfy the minimum funding requirements under ERISA and the IRC.

New York Life has established separate irrevocable grantor trusts covering certain of the non-qualified arrangements to help protect non-qualified payments thereunder in the event of a change in control of New York Life. The grantor trusts are not subject to ERISA.

Other Postretirement Benefits

New York Life provides certain health care and life benefits for eligible retired employees and agents (and their eligible dependents). Employees are eligible for retiree health and life benefits if they are at least age 55 with 10 or more years of service with New York Life. Agents are generally eligible for retiree health and life benefits if they meet certain age and service criteria on the date they terminate service. In either case, an employee or agent must be enrolled in active health care coverage on the date they terminate service to be eligible for retiree coverage.

Employees and agents who retired prior to January 1, 1993 and agents who were active on December 31, 1992 and met certain age or service criteria on that date do not make contributions toward retiree health care coverage. All other eligible employees and agents may be required to contribute towards retiree health care coverage. New York Life pays the entire life insurance costs for retired employees and agents.

New York Life has established two separate Voluntary Employees Beneficiary Association ("VEBA") Trusts, the Employees' Life and Health Benefit Trust ("Employee VEBA") and the Agents' Life and Health Benefit Trust ("Agent VEBA"). The Employee VEBA is currently exclusively used to fund a portion of the postretirement health and life benefits for retired employees, and the Agent VEBA is currently exclusively used to fund a portion of the postretirement health and life benefits for retired agents. In addition, the tax-qualified pension plan for agents includes a medical-benefit component to fund a portion of the postretirement obligations for retired agents and their dependents in accordance with IRC Section 401(h). New York Life pays the remaining balance of these costs.

Postemployment Benefits and Compensated Absences

New York Life provides compensated absences to eligible employees during employment, and certain benefits to eligible employees and agents after termination of service. These benefits include, but are not limited to, salary continuation during medical and pregnancy leaves, short-term disability-related benefits, and continuation of health care benefits.

Plan Assets

Each tax-qualified pension plan currently invests in two group annuity contracts which are held in separate trusts: one contract is an IPG contract relating to New York Life's general account ("GA Contract"), and the other contract relates to New York Life's pooled separate accounts ("SA Contract"). New York Life is the issuer of the GA and SA Contracts. In addition, certain assets are directly invested in third-party real estate investment funds. Total tax-qualified plan assets at December 31, 2019 and 2018 were as follows (in millions):

	Tax-qualified Pension Plans	
	2019	2018
GA Contracts[(1)]	$ 4,282	$ 4,219
SA Contracts[(2)]	2,927	2,687
Third-party real estate investment funds	416	395
Cash	1	1
Total plan assets	$ 7,626	$ 7,302

[(1)] The GA Contracts are included in the Company's assets and Policyholders' account balances in the accompanying Consolidated Statements of Financial Position.
[(2)] The SA Contracts are included in the Company's separate account assets and liabilities in the accompanying Consolidated Statements of Financial Position.

NOTE 14 – BENEFIT PLANS (continued)

Under the GA Contract, NYL Investors manages the assets in the portion of the Company's general account in which the GA Contract participates. The GA Contract provides for the payment of an annual administrative charge based on a percentage of the assets maintained in the fixed account under the contract. Under the SA Contract, certain registered investment advisory subsidiaries of NYL Investments act as investment managers for the pooled separate accounts. The SA Contract provides for the payment of separate annual fees for the management and administration of each separate account.

The assets of each of the VEBA Trusts are invested in MainStay and Vanguard mutual funds, trust owned life insurance ("TOLI") and cash and cash equivalents. Total assets of the other postretirement plans (including VEBA Trusts and 401(h) component) at December 31, 2019 and 2018 are as follows (in millions):

	Other Postretirement Plans	
	2019	2018
IPG Contract (401(h) component)[(1)]	$ 32	$ 30
MainStay Mackay International Equity Fund	72	56
Vanguard mutual funds	208	173
TOLI policies[(2)]	465	395
Cash and cash equivalents	9	11
Total plan assets	$ 786	$ 665

[(1)] Included in the Company's assets and policyholders' account balances in the accompanying Consolidated Statements of Financial Position.
[(2)] Includes $160 million and $157 million in the Company's assets and policyholders' account balances in the accompanying Consolidated Statements of Financial Position for 2019 and 2018, respectively, and $306 million and $238 million in the Company's Separate Accounts assets and liabilities in the accompanying Consolidated Statements of Financial Position for 2019 and 2018, respectively.

New York Life Investments Management LLC ("NYLIM") serves as investment manager of the MainStay Mackay International Equity Fund. The TOLI policies are corporate sponsored universal life ("CSUL") and corporate sponsored variable universal life ("CSVUL") policies issued by NYLIAC. CSVUL policy premiums are invested in certain insurance dedicated funds offered in connection with variable products for which NYLIM serves as investment advisor.

The investment objectives for the tax-qualified pension plans and VEBA Trusts are: (1) to maintain sufficient income and liquidity to fund benefit payments; (2) to preserve the capital value of the plans and trusts; (3) to increase the capital value of the plans and trusts; and (4) to earn a long-term rate of return, which meets or exceeds the plans' and trusts' assumed actuarial rates of return. Under the investment policies for the tax-qualified pension plans, the plans' assets are to be invested primarily in a balanced and diversified mix of high quality equities, fixed income securities, group annuity contracts, private equity investments, real estate investments, hedge fund investments, cash equivalents, and such other assets as may be appropriate. Under the investment policies for the VEBA Trusts, the assets of the trusts are to be invested primarily in insurance contracts (variable and/or fixed) and/or mutual funds, which in turn, invest in a balanced and diversified mix of high quality equities, fixed income securities, cash equivalents, and such other assets as may be appropriate. The Board of Trustees (the "Trustees") monitor and review investment performance to ensure assets are meeting investment objectives.

The Trustees have established a broad investment strategy targeting an asset allocation for both the tax-qualified pension plans and for the VEBA Trusts. Diversifying each asset class by style and type further enhances this allocation. In developing this asset allocation strategy, the Trustees took into account, among other factors, the information provided to them by the plans' actuary, information relating to the historical investment returns of each asset class, the correlations of those returns, and input from the plans' investment consultant. The Trustees regularly review the plans' asset allocations versus the targets and make adjustments as appropriate.

NOTE 14 – BENEFIT PLANS (continued)

The percentage of target allocation and asset allocation, by asset category for the tax-qualified pension plans and the VEBA Trusts at December 31, 2019 and 2018, were as follows:

	Tax-qualified Pension Plans				VEBA Trust			
	Target Allocation		Asset Allocation		Target Allocation		Asset Allocation	
Asset Category	2019	2018	2019	2018	2019	2018	2019	2018
Fixed income securities	65%	65%	64%	65%	30%	30%	30%	33%
Equity securities	35	35	36	35	70	70	70	67
Total	100%	100%	100%	100%	100%	100%	100%	100%

The pooled separate accounts under the SA Contracts and the third-party real estate investment funds invest in various investment securities. Investment securities are exposed to various risks such as interest rate, market and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statements.

NOTE 14 – BENEFIT PLANS (continued)

The fair values (refer to Note 9 - Fair Value Measurements for description of levels) of the tax-qualified pension plans' assets at December 31, 2019 and 2018 were as follows (in millions):

	2019				
Asset Category	**Level 1**	**Level 2**	**Level 3**	**NAV as a Practical Expedient**	**Total**
Cash	$ 1	$ —	$ —	$ —	$ 1
Fixed income securities:					
IPG contract	—	—	4,282	—	4,282
High yield bond separate accounts	—	—	—	373	373
Absolute return hedge fund separate account	—	—	—	7	7
Municipal bond separate account	—	—	—	231	231
Equity securities:					
Private equity separate accounts	—	—	—	824	824
Indexed equity separate account	—	—	—	374	374
International equity separate account	—	—	—	552	552
Small cap core separate account	—	—	—	183	183
Long/short equity hedge fund separate account	—	—	—	383	383
Real estate investment funds	—	—	—	416	416
Total assets accounted for at fair value	$ 1	$ —	$ 4,282	$ 3,343	$ 7,626

	2018				
Asset Category	**Level 1**	**Level 2**	**Level 3**	**NAV as a Practical Expedient**	**Total**
Cash	$ 1	$ —	$ —	$ —	$ 1
Fixed income securities:					
IPG contract	—	—	4,219	—	4,219
High yield bond separate accounts	—	—	—	328	328
Absolute return hedge fund separate account	—	—	—	14	14
Municipal bond separate account	—	—		195	195
Equity securities:					
Private equity separate accounts	—	—	—	711	711
Indexed equity separate account				243	243
International equity separate account	—	—	—	518	518
Small cap core separate account	—	—	—	154	154
Long/short equity hedge fund separate account	—	—	—	359	359
Large cap enhanced separate account	—	—	—	165	165
Real estate investment funds	—	—	—	395	395
Total assets accounted for at fair value	$ 1	$ —	$ 4,219	$ 3,082	$ 7,302

For the years ended December 31, 2019 and 2018, the tax-qualified pension plans purchased $477 million and $2,999 million, respectively, of Level 3 assets related to the IPG contracts. There were no transfers into or out of Level 3 for the years ended December 31, 2019 and 2018.

NOTE 14 – BENEFIT PLANS (continued)

The fair values of other postretirement benefit plan assets at December 31, 2019 and 2018 were as follows (in millions):

	2019				
Asset Category	**Level 1**	**Level 2**	**Level 3**	**NAV as a Practical Expedient**	**Total**
Cash, cash equivalents, and short-term investments	$ —	$ 9	$ —	$ —	$ 9
Fixed income securities:					
CSUL policies	—	—	160	—	160
IPG contract	—	—	32		32
Vanguard Bond Market Index Fund	55	—	—	—	55
Equity securities:					
Vanguard Institutional Index Fund	153	—	—	—	153
MainStay Mackay International Equity Fund	72	—	—	—	72
CSVUL MainStay VP Mackay S&P 500 Indexed Equity Fund	—	—	262	—	262
CSVUL MainStay VP Mackay International Equity Fund	—	—	43	—	43
Total assets accounted for at fair value	$ 280	$ 9	$ 497	$ —	$ 786

	2018				
Asset Category	**Level 1**	**Level 2**	**Level 3**	**NAV as a Practical Expedient**	**Total**
Cash, cash equivalents, and short-term investments	$ —	$ 11	$ —	$ —	$ 11
Fixed income securities:					
CSUL policies	—	—	157	—	157
IPG contract	—	—	30	—	30
Vanguard Bond Market Index Fund	42	—	—	—	42
Equity securities:					
Vanguard Institutional Index Fund	131	—	—	—	131
MainStay Mackay International Equity Fund	56	—	—	—	56
CSVUL MainStay VP Mackay S&P 500 Indexed Equity Fund	—	—	206	—	206
CSVUL MainStay VP Mackay International Equity Fund	—	—	32	—	32
Total assets accounted for at fair value	$ 229	$ 11	$ 425	$ —	$ 665

The table below presents the purchases of other postretirement benefit plan Level 3 assets for the years ended December 31, 2019 and 2018 (in millions):

	2019				
	CSUL Policies	**IPG Contract**	**CSVUL MainStay VP Mackay S&P 500 Indexed Equity Fund**	**CSVUL MainStay VP Mackay International Equity Fund**	**Total**
Purchases	$ —	$ —	$ —	$ 4	$ 4

	2018				
	CSUL Policies	**IPG Contract**	**CSVUL MainStay VP Mackay S&P 500 Indexed Equity Fund**	**CSVUL MainStay VP Mackay International Equity Fund**	**Total**
Purchases	$ —	$ —	$ 4	$ —	$ 4

There were no transfers into or out of Level 3 for the years ended December 31, 2019 and 2018.

NOTE 14 – BENEFIT PLANS (continued)

Determination of Fair Values

The following is a description of the valuation methodologies used to determine fair value, as well as the general classification of such instruments pursuant to the valuation hierarchy.

IPG Contract

The fair value of the IPG contract is its contract value, which represents contributions made, plus interest earned, less funds used to pay claims, premiums and fees. The IPG contract is classified as Level 3 due to the fact that the contract value relies on internal reports that are unobservable by third-party market participants.

Mutual Funds

The MainStay Mackay International Equity Fund and the Vanguard Funds are all open end registered mutual funds which are priced using a daily NAV. The prices are publicly published, and there are no restrictions on contributions and withdrawals. As such, they are classified as Level 1.

CSUL and CSVUL Policies

The CSUL and the CSVUL policies are reported at cash surrender value. These policies have surpassed their surrender charge period; therefore, their cash value and their contract value are equal. These policies are classified as Level 3 since the valuation relies on unobservable inputs to these policies. There is also no secondary market for these assets.

Cash, Cash Equivalents and Short-Term Investments

The carrying value of cash is equivalent to its fair value and is classified as Level 1 in the fair value hierarchy as the amounts are available on demand. Due to the short-term maturities, the carrying value of short-term investments and cash equivalents is presumed to approximate fair value and is classified as Level 2.

Investments in Pooled Separate Accounts and Real Estate Funds

The pooled separate accounts and real estate investment funds net asset value ("NAV") represents the fair value of each unit held by the tax-qualified pension plans and is the level at which transactions occur. The investments are measured using NAV as a practical expedient, and are not required to be leveled.

NOTE 14 – BENEFIT PLANS (continued)

The following tables provide further information about the separate accounts and real estate investment funds (in millions):

		2019			
Category of Investment	**Investment Strategy**	**Fair Value Determined Using NAV**	**Unfunded Commitments**	**Redemption Frequency**	**Redemption Notice Period**
High yield bond separate accounts	High yield bonds	$ 373	$ —	Daily, Pending Market Conditions	N/A
Absolute return hedge fund separate account	Multi-strategy and distressed securities	$ 7	$ —	N/A	30-90 days (Assets subject to lock-up periods)
Municipal bond separate account	Municipal bonds	$ 231	$ —	Daily, Pending Market Conditions	N/A
Long/short equity hedge fund separate account	Long/short equity, futures, options, foreign exchange, arbitrage	$ 383	$ —	Annual, Semi-Annual, Quarterly, Monthly, Daily	30-90 days (Assets subject to lock-up periods)
Private equity separate accounts	Leveraged buyout, mezzanine financing, distressed securities	$ 824	$ 504	N/A	N/A
Equity separate accounts	Indexed, large cap enhanced, international, and small core funds	$ 1,109	$ —	Daily, Pending Market Conditions	N/A
Real estate investment funds	Real estate and real estate related assets	$ 416	$ —	Quarterly	45-90 days (subject to availability of funds)

		2018			
Category of Investment	**Investment Strategy**	**Fair Value Determined Using NAV**	**Unfunded Commitments**	**Redemption Frequency**	**Redemption Notice Period**
High yield bond separate accounts	High yield bonds	$ 328	$ —	Daily, Pending Market Conditions	N/A
Absolute return hedge fund separate account	Multi-strategy and distressed securities	$ 14	$ —	Semi-Annual and Quarterly	60-90 days (Assets subject to lock-up periods)
Municipal bond separate account	Municipal bonds	$ 195	$ —	Daily, Pending Market Conditions	N/A
Long/short equity hedge fund separate account	Long/short equity, futures, options, foreign exchange, arbitrage	$ 359	$ —	Annual, Semi-Annual, Quarterly, Monthly, Daily	90 days or less (Assets subject to lock-up periods)
Private equity separate accounts	Leveraged buyout, mezzanine financing, distressed securities	$ 711	$ 550	N/A	N/A
Equity separate accounts	Indexed, large cap enhanced, international, and small core funds	$ 1,080	$ —	Daily, Pending Market Conditions	N/A
Real estate investment funds	Real estate and real estate related assets	$ 395	$ —	Quarterly	45 - 90 days (subject to availability of funds)

NOTE 14 – BENEFIT PLANS (continued)

Benefit Plan Obligations

The PBO for pension benefits represents the present value of estimated future benefit obligations and includes assumptions for future compensation increases. Accumulated benefit obligations ("ABO") differ from PBO in that it does not take into consideration future salary increases. Actuarial gains and losses primarily reflect the difference between expected and actual results from the impact of assumption changes related to discount rates, future compensation levels and mortality assumptions, as well as other items.

The following table details the change in benefit obligation for the years ended December 31, 2019 and 2018, respectively (in millions):

	Pension Plan Benefits		Other Postretirement Plan Benefits	
	2019	2018	2019	2018
Change in benefit obligation				
Benefit obligation at beginning of year	$ 7,666	$ 8,169	$ 1,537	$ 1,627
Service cost	154	168	23	27
Interest cost	304	271	62	55
Contributions by plan participants	—	—	13	13
Actuarial losses (gains)	1,216	(569)	242	(96)
Benefits paid	(387)	(373)	(79)	(89)
Benefit obligation at end of year	$ 8,953	$ 7,666	$ 1,798	$ 1,537
Change in plan assets				
Fair value of plan assets at beginning of year	$ 7,302	$ 6,973	$ 665	$ 701
Actual return (loss) on plan assets	657	148	132	(24)
Contributions by employer	54	554	55	64
Contributions by plan participants	—	—	13	13
Benefits paid	(387)	(373)	(79)	(89)
Fair value of plan assets at end of year	$ 7,626	$ 7,302	$ 786	$ 665
Funded status	$ (1,327)	$ (364)	$ (1,012)	$ (872)
Net amount recognized in the Consolidated Statements of Financial Position				
Other assets	$ —	$ 659	$ —	$ —
Other liabilities	(1,327)	(1,023)	(1,012)	(872)
Net amount recognized	$ (1,327)	$ (364)	$ (1,012)	$ (872)
Amounts recognized in AOCI				
Net actuarial loss	$ 3,263	$ 2,354	$ 475	$ 327
Prior service credit	(28)	(34)	(142)	(173)
Total	$ 3,235	$ 2,320	$ 333	$ 154
Accumulated benefit obligation for all defined benefit pension plans at December 31	$ 8,454	$ 7,278		

The following table details the PBO and ABO for pension plans in excess of plan assets at December 31, 2019 and 2018 (in millions):

	Pension Plan Benefits	
	2019	2018
PBO	$ 8,953	$ 7,666
ABO	$ 8,454	$ 7,278
Fair value of plan assets	$ 7,626	$ 7,302

NOTE 14 – BENEFIT PLANS (continued)

The following table details the APBO for other postretirement plans in excess of plan assets at December 31, 2019 and 2018 (in millions):

	Other Postretirement Plan Benefits	
	2019	2018
APBO	$ 1,798	$ 1,537
Fair value of plan assets	$ 786	$ 665

The increase in the benefit obligation at December 31, 2019 was primarily driven by actuarial losses of $1,458 million, which were largely the result of a decrease in the weighted-average discount rate used to measure plan liabilities. The decrease in the benefit obligation at December 31, 2018 was primarily driven by actuarial gains of $665 million which were largely the result of an increase in the weighted-average discount rate.

Net Periodic Benefit Cost

The net periodic benefit cost represents the annual accounting expense recognized by the Company and is included in Operating expenses in the accompanying Consolidated Statements of Operations. The components of net periodic benefit cost for the years ended December 31, 2019 and 2018 were as follows (in millions):

	Pension Plan Benefits		Other Postretirement Plan Benefits	
	2019	2018	2019	2018
Service cost	$ 154	$ 168	$ 23	$ 27
Interest cost	304	271	62	55
Expected return on plan assets	(471)	(451)	(47)	(45)
Amortization of net actuarial loss	120	183	11	16
Amortization of prior service credit	(6)	(6)	(32)	(32)
Total net periodic benefit cost	$ 101	$ 165	$ 17	$ 21

Other changes recognized in OCI for the years ended December 31, 2019 and 2018 were as follows (in millions):

	Pension Plan Benefits		Other Postretirement Plan Benefits	
	2019	2018	2019	2018
Net actuarial (gain) loss	$ 1,029	$ (267)	$ 158	$ (27)
Amortization of net actuarial (gain)	(120)	(183)	(11)	(16)
Amortization of prior service credit	6	6	32	32
Total recognized in OCI	$ 915	$ (444)	$ 179	$ (11)

Benefit Plan Assumptions

Benefit obligations are reported based on certain actuarial assumptions, which are subject to change. Due to uncertainties inherent in the estimations and assumptions process, it is at least reasonably possible that changes in these estimates and assumptions could occur in the near term and would be material to the financial statements.

Weighted-average assumptions used to determine benefit obligations at December 31, 2019 and 2018 were as follows:

	Pension Plan Benefits		Other Postretirement Plan Benefits	
	2019	2018	2019	2018
Discount rate for benefit obligations	3.34%	4.45%	3.43%	4.52%
Rate of compensation increase:				
Employees	4.90%	4.90%	4.90%	4.90%
Agents	6.00%	6.00%	N/A	N/A
Interest crediting rates for cash balance plans	3.68%	4.88%	N/A	N/A

NOTE 14 – BENEFIT PLANS (continued)

Weighted-average assumptions used to determine net periodic benefit cost at December 31, 2019 and 2018 were as follows:

	Pension Plan Benefits		Other Postretirement Plan Benefits	
	2019	2018	2019	2018
Discount rate for benefit obligations	4.45%	3.76%	4.52%	3.82%
Service cost discount rate	4.63%	3.90%	4.75%	4.01%
Effective rate of interest on benefit obligations	4.07%	3.39%	4.15%	3.47%
Expected long-term return on plan assets	6.50%	6.50%	6.75%	6.75%
Rate of compensation increase:				
Employees	4.90%	4.90%	4.90%	5.10%
Agents	6.00%	6.00%	N/A	N/A
Interest crediting rates for cash balance plans	3.68%	4.88%	N/A	N/A

New York Life uses a full yield curve approach to determine its U.S. pension and other postretirement benefit obligations as well as the service and interest cost components of net periodic benefit cost.

The discount rates used are based on hypothetical AA yield curves represented by a series of spot discount rates from half a year to 99 years. The spot rate curves are derived from a direct calculation of the implied forward curve, based on the included bond cash flows. Each bond issue underlying the yield curve is required to be non-callable, with a rating of AA, when averaging all available ratings by Moody's Investor Services, Standard & Poor's and Fitch. Additionally, each bond must have at least $300 million par outstanding to ensure it is sufficiently marketable. Finally, the outlier bonds (i.e. those whose yields to maturity significantly deviate from the average yield in each maturity grouping) are removed. The yields are used to discount future pension and other postretirement plan cash flows at an interest rate specifically applicable to the timing of each respective cash flow. For disclosure purposes, the sum of these discounted cash flows are totaled into a single present value and an equivalent weighted-average discount rate is calculated by imputing the singular interest rate that equates the total present value of the stream of future cash flows.

New York Life utilizes a full yield curve approach in the calculation of the service and interest cost components by applying the specific spot rates along the yield curve used in the determination of the benefit obligation to their relevant underlying projected cash flows. The current approach provides a more precise measurement of service and interest cost by improving the correlation between projected benefit cash flows and their corresponding spot rates.

The expected long-term return on assets for the tax-qualified pension plans and the VEBA Trusts is based on (1) an evaluation of the historical behavior of the broad financial markets, (2) the plan's target asset allocation, and (3) the future expectations for returns for each asset class, modified by input from the plans' investment consultant based on the current economic and financial market conditions.

The assumed health care cost trend rates used in measuring the APBO at December 31, 2019 and 2018 were as follows:

	2019		2018	
	Before 65	Age 65 and older	Before 65	Age 65 and older
Following year	7.50%	8.50%	7.75%	8.75%
Ultimate rate to which cost increase is assumed to decline	4.75%	4.75%	4.75%	4.75%
Year in which the ultimate trend is received	2028	2028	2028	2028

For dental plans, the annual rate of increase in the per capita cost of covered health care benefits is assumed to be 5.00% per year for all participants.

NOTE 14 – BENEFIT PLANS (continued)

Cash Flows

New York Life's funding policy for the tax-qualified pension plans is to make annual contributions that are no less than the minimum amount needed to comply with the requirements of the ERISA and the IRC, and no greater than the maximum amount deductible for federal income tax purposes. New York Life does not have any regulatory contribution requirements for 2020.

Prefunding contributions can be made to either of the VEBA Trusts to partially fund postretirement health and life benefits other than pensions. New York Life does not expect to make any prefunding contributions to either of the VEBA Trusts in 2020.

The estimated future benefit payments are based on the same assumptions used to measure the benefit obligations at December 31, 2019. The following benefit payments, which reflect expected future service, as appropriate, are expected to be paid (in millions):

	Pension Plan Benefits	Other Postretirement Plan Benefits	Postemployment Plan Benefits
2020	$ 414	$ 68	$ 9
2021	$ 428	$ 71	$ 9
2022	$ 440	$ 73	$ 10
2023	$ 452	$ 75	$ 10
2024	$ 465	$ 77	$ 11
2025-2029	$ 2,495	$ 409	$ 63

New York Life expects to pay approximately $52 million of non-qualified pension plan benefits during 2020. New York Life expects to pay approximately $50 million for other postretirement benefits during 2020.
For both years ended December 31, 2019 and 2018, New York Life paid $60 million in gross benefit payments related to health benefits. For the years ended December 31, 2019 and 2018, New York Life did not receive any gross subsidy receipts.

Defined Contribution Plans

New York Life maintains various tax-qualified and non-qualified defined contribution plans covering eligible U.S. employees and agents (401(k) plans). For employees, the plans provide for pre-tax, after-tax and/or after-tax Roth salary reduction contributions (subject to maximums) and New York Life matching contributions of up to 4% of annual salary (base plus eligible incentive pay are considered). For the years ended December 31, 2019 and 2018, New York Life's matching contributions to the employees' tax-qualified plan totaled $38 million and $37 million, respectively. A non-qualified plan for employees credits participant and New York Life matching contributions with respect to compensation in excess of the amount that may be taken into account under the tax-qualified plan.

For agents, the plan provides for pre-tax and/or after-tax Roth commission reduction agreements, subject to maximums.

New York Life annually determines the level of contributions to the agents' plan. Contributions are based on each participant's net renewal commissions, net renewal premiums and cash values for the plan year on certain policies for which the participant is the original writing agent. For years ended December 31, 2019 and 2018, New York Life's contributions to the agents' tax-qualified plan totaled $2 million for both years. There is no non-qualified plan for agents.

NOTE 15 – GOODWILL AND OTHER INTANGIBLE ASSETS

Goodwill

Goodwill at December 31, 2019 and 2018 consist of the following (in millions):

	2019	2018
Gross carrying amount	$ 613	$ 620
Accumulated amortization	(61)	—
Cumulative translation adjustment	4	(7)
Goodwill de-recognized during the year	(23)	—
Net carrying amount	$ 533	$ 613

Goodwill is reported in Other assets in the accompanying Consolidated Statements of Financial Position. In 2019 and 2018, the Company completed the annual impairment tests of goodwill, which indicated no impairment was required.

Effective January 1, 2019, the Company began amortizing goodwill under the private company accounting alternative. Amortization expense was $61 million for the year ended December 31, 2019.

Other Intangible Assets

Other intangible assets at December 31, 2019 and 2018 consist of the following (in millions):

	2019			2018		
	Gross Carrying Amount	Accumulated Amortization	Net Carrying Amount	Gross Carrying Amount	Accumulated Amortization	Net Carrying Amount
Intangible assets subject to amortization:						
Asset management contracts	$ 126	$ 80	$ 46	$ 120	$ 70	$ 50
Management contracts	12	5	7	13	5	8
Value of business acquired	54	52	2	54	51	3
Real estate	167	137	30	171	127	44
Intangible assets not subject to amortization	90	—	90	115	—	115
Total	$ 449	$ 274	$ 175	$ 473	$ 253	$ 220

All intangible assets are reported in Other assets in the accompanying Consolidated Statements of Financial Position. The Company completed the annual impairment tests of intangible assets, which required impairments of $25 million and $2 million at December 31, 2019 and 2018, respectively, which were recorded in Operating expenses; the majority of which were related to asset management contracts not subject to amortization.

The value of business acquired asset relates to the purchase of the Company's Mexican insurance subsidiary in 2000. The real estate asset relates to above market leases, leases in place, tenant relationships, and leasing commissions. Other is comprised of non-compete agreements and trademarks.

Intangible assets not subject to amortization consist mainly of asset management contracts where there is no finite useful life.

Amortization expense was $21 million and $22 million for the years ended December 31, 2019 and 2018, respectively. Amortization expense for other intangible assets is expected to be approximately $16 million in 2020, $15 million in 2021, $14 million in 2022, $9 million in 2023, $8 million in 2024, and $27 million in 2025 and thereafter.

During 2019, the Company acquired certain IRA contracts from John Hancock for $6 million, which resulted in an additional intangible asset not subject to amortization of $6 million.

NOTE 15 – GOODWILL AND OTHER INTANGIBLE ASSETS (continued)

During 2018, the Company acquired certain assets of ABN AMRO, a French asset management company, for $12 million, which provides investment and advisory services to various private and institutional clients. This purchase resulted in additional intangible assets of $15 million.

NOTE 16 - COMMITMENTS AND CONTINGENCIES, LOANED SECURITIES AND REPURCHASE AGREEMENTS

Litigation

New York Life and/or its subsidiaries are defendants in individual and/or alleged class action suits arising from their agency sales force, insurance (including variable contracts registered under the federal securities law), investment, retail securities, employment and/or other operations, including actions involving retail sales practices. Some of the actions seek substantial or unspecified compensatory and punitive damages. The Company and/or its subsidiaries are also, from time to time, involved in various governmental, administrative, and investigative proceedings and inquiries.

Notwithstanding the uncertain nature of litigation and regulatory inquiries, the outcome of which cannot be predicted, the Company believes that, after provisions made in the consolidated financial statements, the ultimate liability that could result from litigation and proceedings would not have a material adverse effect on the Company's financial position; however, it is possible that settlements or adverse determinations in one or more actions or other proceedings in the future could have a material adverse effect on the Company's operating results for a given year.

Assessments

Most of the jurisdictions in which the Company is licensed to transact business, require life insurers to participate in guaranty associations, which are organized to pay contractual benefits pursuant to insurance policies issued by impaired, insolvent or failed life insurers. These associations levy assessments, up to prescribed limits, on all member insurers in a particular state on the basis of the proportionate share of the premiums written by member insurers in the line of business in which the impaired, insolvent or failed life insurer is engaged. Some states permit member insurers to recover assessments through full or partial premium tax offsets.

The Company received notification of the insolvency of various life insurers. It is expected that these insolvencies will result in guaranty fund assessments against the Company of approximately $3 million and $5 million, which have been accrued in Other liabilities in the accompanying Consolidated Statements of Financial Position at December 31, 2019 and 2018, respectively. The Company expects to recover $7 million and $8 million at December 31, 2019 and 2018, respectively, of premium offsets reflected in Other assets in the accompanying Consolidated Statements of Financial Position.

Guarantees

The Company, in the ordinary course of its business, has numerous agreements with respect to its affiliates, related parties and other third parties. In connection with such agreements there may be related commitments or contingent liabilities, which may take the form of guarantees. The Company believes the ultimate liability that could result from these guarantees would not have a material adverse effect on the Company's financial position.

NOTE 16 - COMMITMENTS AND CONTINGENCIES, LOANED SECURITIES AND REPURCHASE AGREEMENTS (continued)

Loaned Securities and Repurchase Agreements

The following table represents recognized repurchase agreements that are subject to an enforceable master netting agreement or similar agreement at December 31, 2019 and 2018 (in millions). The Company's dollar rolls repurchase agreements to sell and repurchase securities are not done under master netting agreements or similar agreements and therefore are not included in this table:

	2019				
Offsetting of financial assets	**Gross Amounts of Recognized Financial Instruments**	**Gross Amounts Offset in the Statement of Financial Position**	**Net Amounts Presented in the Statement of Financial Position**	**Securities Collateral [1]**	**Net Amount**
Securities purchased under agreement to resell	$ 528	$ —	$ 528	$ (528)	$ —
Total assets	$ 528	$ —	$ 528	$ (528)	$ —

	2018				
Offsetting of financial assets	**Gross Amounts of Recognized Financial Instruments**	**Gross Amounts Offset in the Statement of Financial Position**	**Net Amounts Presented in the Statement of Financial Position**	**Securities Collateral [1]**	**Net Amount**
Securities purchased under agreement to resell	$ 562	$ —	$ 562	$ (562)	$ —
Total assets	$ 562	$ —	$ 562	$ (562)	$ —

[1] The actual collateral that was held by the custodian was $538 million and $573 million at December 31, 2019 and 2018, respectively, which was capped at the amount recorded in the accompanying Consolidated Statements of Financial Position in accordance with the authoritative guidance.

The following table represents recognized securities lending transactions that are subject to an enforceable master netting agreement or similar agreement at December 31, 2019 and 2018 (in millions):

	2019				
Offsetting of financial liabilities	**Gross Amounts of Recognized Financial Instruments**	**Gross Amounts Offset in the Statement of Financial Position**	**Net Amounts Presented in the Statement of Financial Position**	**Cash Collateral[1]**	**Net Amount**
Securities entered into a security lending agreement	$ 1,304	$ —	$ 1,304	$ (1,304)	$ —
Total liabilities	$ 1,304	$ —	$ 1,304	$ (1,304)	$ —

	2018				
Offsetting of financial liabilities	**Gross Amounts of Recognized Financial Instruments**	**Gross Amounts Offset in the Statement of Financial Position**	**Net Amounts Presented in the Statement of Financial Position**	**Cash Collateral[1]**	**Net Amount**
Securities entered into a security lending agreement	$ 1,327	$ —	$ 1,327	$ (1,327)	$ —
Total liabilities	$ 1,327	$ —	$ 1,327	$ (1,327)	$ —

[1] At December 31, 2019 and 2018, the securities loaned had a fair value of $1,275 million and $1,297 million, respectively. Such assets reflect the extent of the Company's involvement in securities lending, not the Company's risk of loss.

NOTE 16 - COMMITMENTS AND CONTINGENCIES, LOANED SECURITIES AND REPURCHASE AGREEMENTS (continued)

The following table presents the terms and amounts of cash collateral received under security lending transactions for the following types of securities loaned at December 31, 2019 and 2018 (in millions):

	2019					
	Remaining Contractual Maturity of the Agreements					
Type of Security Loaned	**Open**	**30 days or less**	**31 to 60 days**	**61 to 90 days**	**Greater than 90 days**	**Total**
U.S. Treasury	$ 146	$ —	$ —	$ —	$ —	$ 146
U.S. government corporations & agencies	24	—	—	—	—	24
Foreign governments	10	—	—	—	—	10
U.S. corporate	964	—	—	—	—	964
Foreign corporate	160	—	—	—	—	160
Total securities lending transactions	$ 1,304	$ —	$ —	$ —	$ —	$ 1,304

	2018					
	Remaining Contractual Maturity of the Agreements					
Type of Security Loaned	**Open**	**30 days or less**	**31 to 60 days**	**61 to 90 days**	**Greater than 90 days**	**Total**
U.S. Treasury	$ 68	$ —	$ —	$ —	$ —	$ 68
U.S. government corporations & agencies	51	—	—	—	—	51
Foreign governments	7	—	—	—	—	7
U.S. corporate	979	—	—	—	—	979
Foreign corporate	222	—	—	—	—	222
Total securities lending transactions	$ 1,327	$ —	$ —	$ —	$ —	$ 1,327

At December 31, 2019 and 2018, the Company had no agreements outstanding to sell and repurchase securities.

Liens

Several commercial banks have customary security interests in certain assets of the Company to secure potential overdrafts and other liabilities of the Company that may arise under custody, securities lending and other banking agreements with such banks.

Lease Commitments

The Company leases office space, distribution facilities, and certain office equipment under various agreements with various expiration dates. The leases contain provisions for payment of real estate taxes, building maintenance, electricity, and rent escalations.

For the years ended December 31, 2019 and 2018, rent expense was $153 million and $142 million, respectively. Future minimum lease payments under non-cancellable operating leases with original or remaining lease terms in excess of one year at December 31, 2019 were as follows (in millions):

	Real Property	**Equipment**	**Total**
2020	$ 148	$ 12	$ 160
2021	142	9	151
2022	128	6	134
2023	107	4	111
2024	90	4	94
Thereafter	499	3	502
Total	$ 1,114	$ 38	$ 1,152

NOTE 17 - INCOME TAXES

The components of the total Income tax expense for the years ended December 31 were as follows (in millions):

	2019	2018
Current:		
Federal	$ 290	$ (115)
State and local	14	15
Foreign	21	100
Total current income tax expense	325	—
Deferred:		
Federal	132	85
Foreign	37	(10)
Total deferred income tax expense	169	75
Total income tax expense	$ 494	$ 75

Taxes on comprehensive income were a tax expense of $1,928 million and a tax benefit of $1,153 million for the years ended December 31, 2019 and 2018, respectively.

At December 31, 2019 and 2018, the Company recorded a net current income tax receivable of $78 million and $7 million, respectively, which is included in Other assets in the accompanying Consolidated Statements of Financial Position.

The Company's actual income tax expense for the years ended December 31, 2019 and 2018 differs from the expected amount computed by applying the U.S. statutory federal income tax rate of 21% for the following reasons ($ in millions):

	2019		2018	
Statutory federal income tax expense	$ 758	21.0%	$ 391	21.0%
Foreign operations, net of foreign taxes	(1)	—	13	0.7
Tax exempt income	(139)	(3.9)	(49)	(2.6)
Investment credits	(80)	(2.2)	(110)	(5.9)
Amortization and deductions of investments in qualified affordable housing projects	39	1.1	28	1.5
Non-controlling interest	(82)	(2.3)	(72)	(3.9)
Impact of TCJA	—	—	(113)	(6.1)
Other	(1)	—	(13)	(0.7)
Actual income tax expense	$ 494	13.7%	$ 75	4.0%

The TCJA significantly changed U.S. tax law primarily by lowering the corporate income tax rate from 35% to 21% beginning in 2018 and imposing a one-time tax on earnings from foreign subsidiaries where tax had been deferred. In accordance with SAB 118, the following income tax effects were recorded as provisional in 2017 using reasonable estimates due to the need for further analysis of the provisions within the TCJA and collection, preparation and analysis of relevant data necessary to complete the accounting: 1) the effects related to the one-time tax on previously un-taxed foreign earnings, 2) restatement of life insurance reserves for tax purposes, and 3) the change to the assertion that earnings from foreign affiliates are indefinitely reinvested. During 2018, the Company completed the collection, preparation and analysis of data relevant to the TCJA and recognized a $113 million income tax benefit for the year ended December 31, 2018 included in Income tax expense in the accompanying Consolidated Statements of Operations.

NOTE 17 - INCOME TAXES (continued)

The impact of the TCJA is as follows (in millions):

	2018
Deferred tax revaluation from 35% to 21%	$ (137)
Deemed repatriation	24
Total	$ (113)

For tax years beginning January 1, 2018, the TCJA limits life insurance reserves for tax purposes to the greater of the net surrender value or 92.81% of NAIC required reserves. In general, the TCJA will result in lower life insurance reserves for tax purposes than under pre-TCJA law. Tax accounting for these changes requires the restatement of year end tax insurance reserves from pre-TCJA rules to the amounts required to be held under the TCJA. This revaluation requires establishing a "gross up" in which an additional deferred tax asset for the revised book to tax differences is recorded. The TCJA also requires the recapture of prior years' tax benefits from the higher life insurance reserves. This recapture is paid ratably over eight years beginning in 2018 and was recorded as a deferred tax liability in an equal amount to the additional deferred tax asset.

Based on life insurance tax reserve computations that were completed during 2018, an additional measurement-period adjustment of $160 million was made to the deferred tax liability and the offsetting deferred tax asset which had been recorded at December 31, 2017. The restatement of life insurance tax reserves, which has now been determined to be complete, resulted in a total deferred tax liability and offsetting deferred tax asset of $934 million at December 31, 2018. The finalization of this adjustment had no effect on Income tax expense for the year ended December 31, 2018 reported in the accompanying Consolidated Statements of Operations.

The Company does not assert that earnings of its foreign affiliates are indefinitely reinvested, and recognizes the appropriate deferred tax liability for U.S. taxes that would be paid if earnings are distributed from the foreign operations.

The components of the net deferred tax liability reported in Other liabilities in the accompanying Consolidated Statements of Financial Position at December 31, 2019 and 2018, are as follows (in millions):

	2019	2018
Deferred tax assets:		
Future policy benefits	$ 1,074	$ 940
Employee and agent benefits	968	566
Net operating losses	22	26
Other	56	222
Gross deferred tax assets before valuation allowance	2,120	1,754
Valuation allowance	(25)	(26)
Gross deferred tax assets after valuation allowance	2,095	1,728
Deferred tax liabilities:		
Investments	3,557	729
DAC	596	985
Fixed assets	166	132
Other	1	5
Gross deferred tax liabilities	4,320	1,851
Net deferred tax liability	$ (2,225)	$ (123)

The deferred tax assets relate to temporary differences that are expected to reverse as net ordinary deductions or capital losses. Deferred income taxes are generally recognized, based on enacted tax rates, when assets and liabilities have different values for financial statement and tax purposes. A valuation allowance is recorded if it is more likely than not that any portion of the deferred tax asset will not be realized.

NOTE 17 - INCOME TAXES (continued)

At December 31, 2019 and 2018, the Company had federal and foreign gross net operating loss ("NOL") carry forwards of $184 million and $204 million, respectively. At December 31, 2019, deferred tax assets for these NOLs will begin to expire in 2027.

The Company's federal income tax returns are routinely audited by the IRS and provisions are made in the financial statements in anticipation of the results of these audits. The IRS has completed audits through 2010 and tax years 2011 through 2013 are currently under examination. There were no material effects on the Company's consolidated financial position and results of operations as a result of these audits. The Company believes that its recorded income tax liabilities for uncertain tax positions are adequate for all open years.

The Company's total interest expense associated with the liability for unrecognized tax benefits for the years ended December 31, 2019 and 2018 was $14 million and $9 million, respectively, and are included in Income tax expense in the accompanying Consolidated Statements of Operations. At December 31, 2019 and 2018, the Company had $55 million and $41 million, respectively, of accrued interest associated with the liability for unrecognized tax benefits, which is reported in Other liabilities in the accompanying Consolidated Statements of Financial Position. The $14 million increase in the liability for unrecognized tax benefits is the result of a $14 million increase in interest expense and a less than $1 million decrease resulting from settlements with tax authorities recorded in 2019. The Company does not anticipate any significant changes to its total unrecognized tax benefits within the next 12 months.

NOTE 18 - DEBT

Recourse Debt

Recourse debt, net of unamortized debt issuance costs, consisted of the following at December 31, 2019 and 2018 (in millions):

	Maturity Date	Interest Rate	2019	2018
Short-term recourse debt:				
Commercial paper			$ 497	$ 499
Long-term recourse debt:				
2019 Surplus Notes	5/15/2069	4.450%	983	—
2009 Surplus Notes	11/15/2039	6.750%	991	989
2003 Surplus Notes	5/15/2033	5.875%	989	987
Total long-term recourse debt			2,963	1,976
Total short-term and long-term recourse debt			$ 3,460	$ 2,475

Commercial Paper

New York Life Capital Corporation ("NYLCC"), an indirect wholly owned subsidiary of New York Life, serves as a conduit for New York Life to the credit markets and issues commercial paper to institutional investors. For the years ended December 31, 2019 and 2018, interest expense totaled $12 million and $10 million, respectively. The following table provides additional information on commercial paper:

	2019	2018
Weighted average maturity of outstanding commercial paper, in days	26.6	24.1
Weighted average interest rate on outstanding commercial paper	1.78%	2.43%

The commercial paper issued by NYLCC matures on various dates through April 2020 and April 2019, respectively.

NOTE 18 – DEBT (continued)

Surplus Notes

On April 4, 2019, New York Life issued surplus notes ("2019 Notes") with a principal balance of $1,000 million, at a discount of $7 million. On October 8, 2009, New York Life issued surplus notes ("2009 Notes") with a principal balance of $1,000 million, at a discount of $2 million. On May 5, 2003, New York Life issued surplus notes ("2003 Notes") with a principal balance of $1,000 million, at a discount of $10 million. All of the notes, inclusive of the 2019 Notes, the 2009 Notes and 2003 Notes (collectively the "Notes"), were issued pursuant to Rule 144A under the Securities Act of 1933, as amended, and are administered by a United States bank as registrar/paying agent. Interest on the Notes is scheduled to be paid semi-annually on May 15 and November 15 of each year.

The Notes are unsecured and subordinated to all present and future indebtedness, policy claims and other creditor claims of New York Life. There are no principal payments due in respect of the Notes prior to maturity. Each payment of interest or principal may be made only with the prior approval of the Superintendent of the Department and only out of surplus funds, which the Superintendent determines to be available for such payments under New York State Insurance law. Provided that approval is granted by the Superintendent, the Notes may be redeemed at the option of the Company at any time, in whole or in part, at the "make-whole" redemption price equal to the greater of (1) the principal amount of the Notes to be redeemed, or (2) the sum of the present values of the remaining scheduled interest and principal payments on the Notes to be redeemed, excluding accrued interest as of the date on which the Notes are to be redeemed, discounted to the date of redemption on a semi-annual basis at an adjusted treasury rate plus 20 basis points ("bps") in the case of the 2003 Notes, 40 bps in the case of the 2009 Notes, and 25 bps in the case of the 2019 Notes, plus in each case, accrued interest on the Notes to be redeemed through the redemption date.

For the years ended December 31, 2019 and 2018, interest expense on New York Life's Notes totaled $159 million and $126 million, respectively. In addition, accrued interest at December 31, 2019 and 2018 was $21 million and $16 million, respectively.

Non-Recourse Debt

Non-recourse debt primarily represents debt issued by SPEs consolidated by the Company. Only the assets of these entities can be used to settle their respective liabilities, and under no circumstances is the Company or any of its subsidiaries or affiliates liable for any principal or interest shortfalls should any arise. At December 31, 2019 and 2018, the Company's total non-recourse debt was $3,550 million and $3,401 million, respectively.

The Company consolidated certain collateralized structures for which it is the investment manager. The long-term debt related to these structures bears interest primarily at LIBOR plus a spread ranging from 0.22% to 7.50%, payable primarily on a quarterly basis and is expected to be repaid over the next 11 years. For the years ended December 31, 2019 and 2018, interest expense related to these obligations was $41 million and $64 million, respectively. After the non-call period, the long-term debt may be redeemed by liquidation, in whole only, by the majority of the residual tranche holders at the respective redemption prices. Refer to Note 6 - Investments for the classification and valuation of the assets supporting these liabilities.

In accordance with authoritative guidance on collateralized finance entities, the Company has elected the measurement alternative in measuring the long-term debt of certain of its' consolidated collateralized structures for which it is the investment manager. The measurement alternative allows the financial assets and the financial liabilities to be measured using the more observable of the two. The Company has measured the long-term debt of certain of its' consolidated collateralized structures using the fair value of the entities financial assets, as their value has been deemed more observable. Refer to Note 6 - Investments for the classification and valuation of the assets supporting this liability.

The Company, through VIEs controlled by Madison Capital Funding LLC ("MCF") and its subsidiaries, has entered into certain collateralized loan agreements to borrow non-recourse debt. MCF is a majority-owned subsidiary of New York Life. For the years ended December 31, 2019 and 2018, interest expense was $20 million and $18 million, respectively. At December 31, 2019 and 2018, there was no accrued interest. Refer to Note 6 - Investments for the classification and valuation of the assets supporting these liabilities.

NOTE 18 – DEBT (continued)

The Company, through a real estate fund consolidated by its indirect wholly owned subsidiary, NYL Investments, has entered into certain secured borrowing agreements. For the years ended December 31, 2019 and 2018, interest expense related to these obligations totaled $15 million and $13 million, respectively.

Line of Credit

Effective January 29, 2019, the Company entered into a five-year $1,500 million revolving credit facility agreement ("the Facility") with a syndicate of lenders expiring on January 29, 2024. Facility fees are payable at an annual rate of 4.5 bps of the lenders' commitment amounts. For the Facility, the borrowing rate is 70 bps over LIBOR.

Facility fees and borrowing rates could increase if New York Life's Standard & Poor's and Moody's Financial Strength ratings were downgraded. At December 31, 2019 and 2018, the Company has not made any borrowings under the Facility.

NOTE 19 - EQUITY

The balance of and changes in each component of AOCI attributable to New York Life were as follows (in millions):

	Foreign Currency Translation Adjustments	Net Unrealized Investment Gains (Losses)[1]	Defined Benefit Plans Adjustment	Total Accumulated Other Comprehensive Income (Loss)
Balance, December 31, 2017	$ (676)	$ 5,320	$ (2,325)	$ 2,319
Other comprehensive income (loss), net of tax:				
Change in foreign currency translation adjustment (net of income tax expense of $4 million)	(70)	—	—	(70)
Change in net unrealized investment gains (losses), net of related offsets, reclassification adjustments and income taxes	—	(4,456)	—	(4,456)
Benefit plans:				
Gains and prior service credits (costs) arising during the period (net of income tax expense of $62 million)	—	—	228	228
Less: amortization of gains and prior service costs included in net periodic benefit costs, (net of income tax expense of $30 million)	—	—	131	131
Benefit plans, net	—	—	359	359
Other comprehensive income (loss), net of tax	(70)	(4,456)	359	(4,167)
Change in accounting principle - reclass of stranded tax effects	—	(45)	—	(45)
Balance, December 31, 2018	$ (746)	$ 819	$ (1,966)	$ (1,893)
Other comprehensive income (loss), net of tax:				
Change in foreign currency translation adjustment (net of income tax benefit of $13 million)	(19)	—	—	(19)
Change in net unrealized investment gains (losses), net of related offsets, reclassification adjustments and income taxes	—	8,010	—	8,010
Benefit plans:				
Losses and prior service credits (costs) arising during the period (net of income tax benefit of $249 million)	—	—	(942)	(942)
Less: amortization of gains and prior service costs included in net periodic benefit costs, (net of income tax expense of $19 million)	—	—	74	74
Benefit plans, net	—	—	(868)	(868)
Other comprehensive income (loss), net of tax	(19)	8,010	(868)	7,123
Change in accounting principle - reclass of stranded tax effects	—	—	—	—
Balance, December 31, 2019	$ (765)	$ 8,829	$ (2,834)	$ 5,230

[1] Includes cash flow hedges. Refer to Note 7 - Derivative Instruments and Risk Management for information on cash flow hedges. Refer to Note 10 - Investment Income and Investment Gains and Losses for additional information regarding unrealized investment gains (losses), including the split between amounts related to fixed maturities on which an other-than-temporary impairment loss has been recognized, and all other unrealized investment gains or losses.

NOTE 19 – EQUITY (continued)

The following is a rollforward of AOCI attributable to New York Life for the years ended December 31, 2019 and 2018 (in millions):

	2019			
	Accumulated Other Comprehensive Income (Loss) Attributable to New York Life			
	Foreign Currency Translation Adjustments[1]	Net Unrealized Investment Gains (Losses)[1] [2]	Pension and Postretirement Unrecognized Net Periodic Benefit (Cost)[1]	Total AOCI[1]
Beginning balance	$ (746)	$ 819	$ (1,966)	$ (1,893)
Change in OCI before reclassifications	(19)	8,078	(942)	7,117
Amounts reclassified from AOCI	—	(68)	74	6
Net OCI	(19)	8,010	(868)	7,123
Change in accounting principle	—	—	—	—
Ending balance	$ (765)	$ 8,829	$ (2,834)	$ 5,230

	2018			
	Accumulated Other Comprehensive Income (Loss) Attributable to New York Life			
	Foreign Currency Translation Adjustments[1]	Net Unrealized Investment Gains (Losses)[1] [2]	Pension and Postretirement Unrecognized Net Periodic Benefit (Cost)[1]	Total AOCI[1]
Beginning balance	$ (676)	$ 5,320	$ (2,325)	$ 2,319
Change in OCI before reclassifications	(70)	(4,483)	228	(4,325)
Amounts reclassified from AOCI	—	27	131	158
Net OCI	(70)	(4,456)	359	(4,167)
Change in accounting principle	—	(45)	—	(45)
Ending balance	$ (746)	$ 819	$ (1,966)	$ (1,893)

(1) All amounts are net of tax and DAC.
(2) Includes cash flow hedges and net investment hedges. Refer to Note 7 - Derivative Instruments and Risk Management for information on cash flow hedges. Refer to Note 10 - Investment Income and Investment Gains and Losses for additional information regarding unrealized investment gains or losses, including the split between amounts related to fixed maturities on which an other-than-temporary impairment loss has been recognized, and all other unrealized investment gains or losses.

NOTE 19 – EQUITY (continued)

The amounts reclassed out of AOCI[1] attributable to New York Life for the years ended December 31, 2019 and 2018 were as follows (in millions):

	2019	2018	Affected Line Item in the Consolidated Statements of Operations
Net unrealized investment (gains) losses			
Gains and losses on cash flow hedges:			
Interest rate swaps	$ (6)	$ (6)	Net investment income
Interest rate swaps	(3)	(4)	Net investment gains (losses)
Currency swaps	(15)	—	Net investment gains (losses)
Currency swaps	(2)	(1)	Net investment income
Gains and losses on available-for-sale securities:			
Impairment losses	4	(10)	Net investment gains (losses)
All other	109	(13)	Net investment gains (losses)
Net unrealized gains, pre-tax	87	(34)	Net investment gains (losses)
Income tax expense (benefit)	(19)	7	Income tax expense
Net unrealized gains, net of tax	68	(27)	Net income
Amortization of defined benefit pension items			
Prior service credit	(38)	(38)	Operating expenses
Actuarial loss	131	199	Operating expenses
Amortization of defined benefit pension items, pre-tax	93	161	Operating expenses
Income tax expense	19	30	Income tax expense
Amortization of defined benefit pension items, net of tax	74	131	Net income
Total reclassifications for the period	$ 142	$ 104	Net income

[1] Negative amounts indicate gains/benefits reclassified out of AOCI. Positive amounts indicate losses/costs reclassified out of AOCI.

NOTE 20 - SUPPLEMENTAL CASH FLOW INFORMATION

Income taxes paid/(received) were $349 million and $(437) million for the years ended December 31, 2019 and 2018, respectively.

Interest paid was $428 million and $362 million for the years ended December 31, 2019 and 2018, respectively.

Non-cash transactions

Non-cash investing transactions were $276 million for the year ended December 31, 2019, primarily related to fixed maturities, equity securities, real estate, mortgage loans, limited partnerships and other assets. Non-cash investing transactions were $468 million for the year ended December 31, 2018, primarily related to fixed maturities, equity securities, real estate, mortgage loans, limited partnerships and other assets.

NOTE 21 – STATUTORY FINANCIAL INFORMATION

As discussed in Note 2 - Basis of Presentation, the Department recognizes only SAP prescribed or permitted practices by the State of New York for determining and reporting the financial position and results of operations of an insurance company, for determining its solvency under New York State Insurance law and whether its financial position warrants the payment of a dividend to its policyholders. In addition, the Company's insurance subsidiaries, NYLIAC and NYLAZ, are subject to reporting requirements with the Delaware and Arizona Insurance Departments, respectively. No consideration is given by any of the State Insurance Departments to financial statements prepared in accordance with GAAP in making such determinations.

The following tables reconcile the Company's net income and capital and surplus at December 31 between practices prescribed by the State of New York and NAIC SAP (in millions):

	2019	2018
Net income, State of New York basis	$ 378	$ 1,210
State prescribed practices:		
NYSDFS Circular Letter No. 11 (2010) impact on deferred premiums	9	1
NYSDFS Seventh Amendment to Regulation No. 172 admitted unearned reinsurance premium	(4)	(2)
Net income, NAIC SAP	$ 383	$ 1,209

	2019	2018
Capital and surplus, State of New York basis	$ 22,032	$ 21,006
State prescribed practices:		
NYSDFS Circular Letter No. 11 (2010) impact on deferred premiums	132	124
NYSDFS Seventh Amendment to Regulation No. 172 admitted unearned reinsurance premium	(54)	(50)
Capital and surplus, NAIC SAP	$ 22,110	$ 21,080

NOTE 22 – SUBSEQUENT EVENTS

At March 12, 2020, the date the financial statements were available to be issued, there have been no events occurring subsequent to the close of the Company's books or accounts for the accompanying consolidated financial statements that would have a material effect on the financial condition of the Company.

GLOSSARY OF TERMS

Term	Description
ABO	Accumulated benefit obligation
ABS	Asset-backed securities
Agent VEBA	Agents' Life and Health Benefit Trust
AOCI	Accumulated other comprehensive income
APBO	Accumulated postretirement benefit obligation
ASC	Accounting Standards Codification
BPS	Basis points
CDS	Credit default swaps
CMBS	Commercial mortgage-backed securities
CSAs	Credit support annexes
CSUL	Corporate sponsored universal life policies
CSVUL	Corporate sponsored variable universal life policies
CTA	Cumulative translation adjustment
CVP	Credit Value Partners LP
DAC	Deferred policy acquisition costs
EBB	Enhanced beneficiary benefit
EBITDA	Earnings before interest, taxes, depreciation and amortization
Employee VEBA	The Employees' Life and Health Benefit Trust
ERISA	Employee Retirement Income Security Act of 1974
FASB	Financial Accounting Standards Board
FHLB of NY	Federal Home Loan Bank of New York
FHLB of Pittsburgh	Federal Home Loan Bank of Pittsburgh
FVO	Fair value option
GA Contract	IPG contract relating to New York Life’s general account
GAAP	Generally accepted accounting principles
GFIB	Guaranteed future income benefits
GLWB	Guaranteed lifetime income withdrawal benefits
GMAB	Guaranteed minimum accumulation benefits
GMDB	Guaranteed minimum death benefits
IPG	Immediate participation guarantee
IRC	Internal Revenue Code
IRS	Internal Revenue Service
LP/LLC	Limited partnerships/limited liability companies
LTV	Loan to value ratio
MBS	Mortgage-backed securities
MCF	Madison Capital Funding LLC
MTN	Medium term notes
NAIC	National Association of Insurance Commissioners
NAV	Net asset value
New York Life	New York Life Insurance Company

Term	Description
NOL	Net operating loss
NYLCC	New York Life Capital Corporation
NYLIAC	New York Life Insurance and Annuity Corporation
NYLIM	New York Life Investments Management LLC
NYL Investments	NYL Investments Management Holdings LLC
OCI	Other comprehensive income
OTC	Over-the-counter
OTC-cleared	Over-the-counter clearinghouse
OTC-bilateral	Over-the-counter bilateral agreements
OTTI	Other-than-temporary impairment(s)
PAD	Provision for the risk of adverse deviation
PBO	Projected benefit obligation
RMBS	Residential mortgage-backed securities
ROU	Right of Use
SAB 118	Staff Accounting Bulletin 118, Income Tax Accounting Implications of the Tax Cuts and Jobs Act
SA Contract	Contract related to New York Life's pooled separate accounts
SAP	Statutory accounting principles
SEC	The U.S. Securities and Exchange Commission
SPE	Special purpose entity/entities
Taiwan Branch	NYLIAC's former branch operations in Taiwan
Taiwan Corporation	New York Life Insurance Taiwan Corporation
TCJA	Tax Cuts and Jobs Act
TDR	Troubled debt restructuring
The Company	New York Life Insurance Company and its subsidiaries
The Facility	Revolving credit facility agreement
The Notes	The surplus notes issued in 2003, 2009, and 2019
TOLI	Trust owned life insurance
VEBA	Voluntary Employees Beneficiary Association Trusts
VIEs	Variable interest entities
VOBA	Value of business acquired
Yuanta	Yuanta Financials Holding Co., Ltd.
2003 Notes	Surplus notes issued in 2003
2009 Notes	Surplus notes issued in 2009
2019 Notes	Surplus notes issued in 2019