

Draft: 5/12/26

Speed to Market (D) Working Group  
Virtual Meeting  
April 23, 2026

The Speed to Market (D) Working Group of the Market Regulation and Consumer Affairs (D) Committee met April 23, 2026. The following Working Group members participated: Julie Fairbanks, Chair (VA); Maureen A. Motter, Vice Chair (OH); Crystal Phelps (AR); Susan Jennette (DE); Sharon Holston (ID); Julie Rachford (IL); Craig Van Aalst (KS); Tammy Lohmann (MN); Brandi Simmons (MO); LuAnne J. King (NH); Mark Worman (TX); Kelly Christensen (UT); Rob Lee (WA); Lela D. Ladd (WY); and Tim Sigman (WV).

1. Adopted its Oct. 8, 2025, Minutes

Fairbanks said the Working Group met Oct. 8, 2025, and took the following action: 1) adopted its Aug. 21, 2025, minutes; 2) received an update on the System for Electronic Rates & Forms Filing (SERFF) metrics report; 3) discussed the *Product Filing Review Handbook* annual review process; 4) heard a report on the SERFF modernization project and SERFF Product Steering Committee (PSC); and 5) received an update on the Interstate Insurance Product Regulation Commission (Compact).

Ladd made a motion, seconded by Jennette, to adopt the Working Group's Oct. 8, 2025, minutes (Attachment XX). The motion passed unanimously.

2. Discussed its 2026 Charges

Fairbanks introduced herself as the new Working Group chair and provided an overview of her background. She noted Motter, the previous chair, will serve as vice chair and that she will rely on Motter's expertise, particularly on property/casualty (P/C)-specific issues. She invited Working Group members to provide feedback on the group's charges during the meeting, by email, or at future meetings.

Fairbanks noted the charge to consider the proposed SERFF features or functionality presented by the PSC and to review the PSC's periodic reports. She asked how the Working Group could be more active in partnering with SERFF to provide feedback on features and functionality. Bridget Kieras (NAIC) stated the SERFF team is happy to partner, particularly on major enhancements, and noted the PSC continues to meet monthly with 100 to 120 attendees. Fairbanks mentioned bringing a Compliance Language Assistant for Regulatory Analysis (Clara) presentation and use cases from other states to a future meeting.

Fairbanks highlighted the charge to provide a forum for gathering information from states and industry on tools, policies, and resolutions to address common filing issues. She explored opportunities for discussion and suggested creating a resource list of working groups and topics, considering regulator-only calls for certain product filing types, and inviting the industry to bring common filing issues to the Working Group. Kieras asked whether the Speed to Market (D) Working Group has a presence on NAIC Connect. Monique Rojas (NAIC) confirmed it does not. Kieras suggested creating one. Motter expressed support and cited a past example in which companies experienced difficulty filing products while simultaneously working on certificates of authority.

Fairbanks noted the Working Group began working last year on a filing metrics report for commissioners using SERFF Tableau reports. The report did not meet the Spring National Meeting deadline and remains in process.

Fairbanks noted the deadline for product coding matrix (PCM) and uniform transmittal document (UTD) change suggestions is April 30. Motter stated she would compile suggestions for a future meeting. Jeremy Chance (NAIC) confirmed no submissions had been received and offered to send additional communication. Baggerly asked whether the UTD maps to what users see in SERFF. Motter explained that the UTD is a holdover from pre-SERFF paper filings and that much of its content has been built into SERFF. She noted few UTD change requests have been received in recent years. Kieras asked whether the UTD might now be obsolete and could be retired given the modernization. Fairbanks stated she would add this to the agenda for a future meeting. Motter reminded the Working Group that PCM changes approved this year would become effective Jan. 1, 2027.

Fairbanks noted a significant overhaul of the *Product Filing Review Handbook* was completed a couple of years ago, with technical edits made by Petra Wallace (NAIC) last year. She asked for volunteers for a subgroup of two to three members to review the handbook and present recommendations. Motter asked members to flag any topics that have been missed or are known to be incorrect. Ladd volunteered for the subgroup. Fairbanks stated the group would aim to review a couple of chapters between meetings.

Fairbanks asked for suggestions on how the Working Group can better support the Compact. Ladd raised a gap between what is filed with the Compact and what is filed with the states. Fairbanks suggested setting time to discuss further and noted states should also bring filings to the Compact.

### 3. Heard a Report on the SERFF Modernization Project and SERFF PSC

Kieras provided an update on the PSC. The committee meets monthly with 100 to 120 attendees. Meetings include presentations, platform updates, demonstrations, and engagement activities. The Okta cutover is complete. Summaries, recordings, and future dates are available on the SERFF website.

Kieras reported the Compact went live on the new SERFF platform in March 2025. She explained the Compact was chosen as the first group because of its smaller footprint, close partnership with the NAIC, and willingness to undertake risk. She noted that this is the largest IT project the NAIC has ever undertaken, and that a phased rollout was selected to ensure high-quality support. The team has deployed improvements continuously since launch through daily to weekly releases. The Compact has been an exceptional partner in helping refine the platform for states.

Kieras highlighted features built into the new platform, including a modern interface, streamlined filing creation, the first AI implementation in the form schedule, consolidation of four filing update methods into one, document annotation with cross-filing comparison, enhanced review features using a task-based approach, email notifications, and tailored disposition of public access. She explained the team built a stable core first and is now adding features, focusing on usability and quality of life. Every legacy feature is rethought rather than simply replicated, drawing on decades of experience.

Kieras stated significant performance improvements were made in late 2025 and early 2026. The team is working with 10 early adopter states on application training, state-specific development, filer outreach, data migration, and change control. The target is for early adopters to begin moving to production in the second half of 2026, initially one state at a time. Data migration is the primary constraint: the Compact had approximately 12,000 filings, and migration took about a day and a half. Deployments will occur on weekends, and rollout will be staggered as confidence builds.

Kieras announced the formation of cohort two, the next group of states. Approximately 10 states have already expressed interest. Selection involves a mutual evaluation of state readiness and technical fit. Selection and

announcement are planned for the end of the second quarter of 2026. After cohort two, the team expects 20 to 25 states to have completed the process, enabling faster progression. Plan management requirements gathering will begin in the late third or fourth quarter of 2026. Types of insurance integrated with plan management will remain in legacy, and all states will likely move to plan management at the same time.

Kieras explained that the original plan was to move all life, annuity, and credit business areas six months after the Compact. The team learned that moving all states at once created too much risk due to change management needs, state-specific configuration, and data migration complexity. State data is typically older and more complex than Compact data. The phased approach allows quality support, gradual industry training, and process maturation. During the coexistence period, states will have different transition dates, and many users will operate in both systems. Tools and messaging are being developed to guide users.

Kieras introduced Clara, an AI-powered compliance review tool that uses natural language processing to read forms and compare them to regulatory standards. She stated Clara was built by the NAIC within its infrastructure, uses AWS components and machine learning models, but does not train those models with user data, and uses single sign-on with Okta credentials. Clara is a lightweight, standalone application that sits outside both versions of SERFF, so states can use it even if they are not on the new platform.

Kieras explained that Clara learns individual rules through language, examples, and test cases. Rules are grouped into rule groups that function as checklists, with a many-to-many relationship allowing reuse across product types and review cycles. Clara provides pass/fail results with explanations, but reviewers always have final ownership. Integration will tighten over time, and eventually, Clara will be embedded in the review process.

Kieras stated Arizona, Connecticut, and Vermont are currently piloting Clara, as well as the Compact. Arkansas and the District of Columbia have signed on and will begin onboarding shortly. Future roadmap items include rule sharing between states and industry-facing features that would advise insurers of potential objections before submission.

Kieras clarified that Clara is independent of early adopter and cohort two status. Any state can sign up once ready. States must be willing to participate and may need to work through internal policy or governance decisions. Clara is not mandatory. Kieras stated that states need to use Clara themselves first to gain confidence, and the NAIC must build the necessary interfaces. Industry-facing features are not expected this year but are on the roadmap for next year.

#### 4. Discussed Product Requirements Locator Decommission

Fairbanks stated that the Product Requirements Locator (PRL) is nearing the end of its life. She explained that the PRL was intended to allow companies to access state product filing requirements, but states have not been updating it, and the industry has not been using it. She noted that only a few states still have content.

Fairbanks asked states that still have requirements in the PRL to notify her or Rojas by May 1 regarding how much time they would need to copy or download information before decommissioning.

Kieras stated that if a state's content is out of date, the state should reach out to Brandy Woltkamp (NAIC) or Kieras for behind-the-scenes assistance rather than spending time copying and downloading.

Lohmann stated that Minnesota's PRL is up to date and contains extensive information used by the enforcement division on a regular basis. She expressed strong concern about losing the data and stated Minnesota had no prior opportunity to move the information and does not have the staff to do so.

Kieras reassured the Working Group that the NAIC would not decommission the PRL without adequate notice. She stated the NAIC wants to begin the process because of technical compliance work required to maintain the tool, and given the overall low usage, it does not appear to be a good use of developer time. She stated the NAIC will work with Minnesota to address the situation.

Fairbanks asked other states to reach out with concerns and stated the Working Group would follow up at the next meeting.

Having no further business, the Speed to Market (D) Working Group adjourned.