

| | Regulator or IP | IDENTIFICATION OF SPEED TO MARKET TOOL SUGGESTED FOR CHANGE | DESCRIPTION OF SUGGESTED TOOL CHANGE | REASON OR JUSTIFICATION FOR SUGGESTED CHANGE | ADDITIONAL THOUGHTS TO CONSIDER WHEN EVALUATING THE SUGGESTION? |
|---|-----------------|--|--|---|---|
| 1 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Transmittal Document | Change the term "Implementation Date" to "Effective Date" on the filing and Disposition Letter | <p>The effective date is the date on which the insurance company becomes liable under the contract. The date the contract goes into force; it is on the policy.</p> <p>While the implementing date is the carrying out, execution, or practice of a plan, a method, or any design, idea, model, specification, standard or policy for doing something. As such, implementation is the action that must follow any preliminary thinking in order for something to actually happen.</p> | Change the label to Effective/Implementation Date with state instructions on request. Add Quick Text for Disposition to indicate what the date means. |
| 2 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Create a sub-TOI for expatriate plans within the H15 TOI | Expatriate plans are exempt for the Affordable Care Act and would recommend that they have a separate sub-TOI for identification and ease of locating. Recommendation having coded or considered similar to the creation of a short-term limited-duration plans. | If agree, do we need TOI for H15G and H15I? |

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| 3 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | <p>New TOI: A09I Individual Annuities - Registered Index-Linked</p> <p>New Sub-TOI: A09I.001 Interim Value based on fair value A09I.002 Interim Value based on proxy value A09I.003 Interim Value based on other approach</p> <p>Alternative: New Sub-TOI: A07I.004 Registered Index-Linked</p> | We are seeing more of these products and feel there should be a separate TOI/subTOI for them so they can be located in a search. | <p>Is this applicable for group as well as individual?</p> <p>Should we consider alternate solution of just 1 or 2 new TOIs A07I and or A07G and use Filing Labels for additional product granularity. Regulators can search on Filing Labels.</p> |
| 4 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Under H17G Group Health - Prescription Drug on page 20, include a sub-TOI for "Group Medicare Part D Supplement" to be used for plans sold to retiree groups to supplement the benefits provided by Medicare Part D. | Medicare Part D supplemental filings are not received very often, but they have very unique characteristics and requirements, so it would be helpful to be able to identify these filings separately from other filings. | What TOI/Sub-TOI combination are people using today? Would it make sense to add this as a Sub-TOI under MS09 Other? |
| 5 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Include a new TOI and sub-TOI for "Group Retiree Health" to be used for plans designed to provide health insurance coverage to retirees of an employer. | Group retiree health insurance products are not received particularly often, but they also have very unique characteristics and requirements, so it would be helpful to be able to identify these filings separately from other filings. | <p>What TOI/Sub-TOI combination are these submitted under today? Are there different requirements for these?</p> <p>Would identification using a Filing Label be sufficient?</p> |

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| 6 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Include a new TOI for combined dental and vision products with a sub-TOI for dental/vision with hearing benefits and a sub-TOI for dental/vision without hearing benefits. | There are currently separate TOIs for Dental, Vision, and Hearing, but we often receive filings that combine these benefits under the same contract. Currently, a filer must select one of the benefit-specific TOIs (or the ML02 Multi-Line - Other TOI), even though the filing includes a combination of benefits. | Would the additional benefits flag work to identify these policies? |
| 7 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Include a new TOI for "H# Multi-Line - Other" to be used for forms with multiple products that are all health coverages. | There is currently a TOI for ML02 Multi-Line - Other, which is primarily used for filings that include life and health forms, although some companies use this TOI for filings with multiple health coverages. A few states have separate instances in SERFF for health and life filings. The existing Multi-Line TOI can only be used in one of the instances. It would therefore be helpful if there was a health-specific TOI for filings that apply only to multiple health coverages. Currently, we require filers to select one of the benefit-specific TOIs that applies to one of the multiple health coverages included in the filing. | Could the TOI of H21 Health Other be used for these filing? |

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| 8 | Regulator | Uniform Life, Accident and Health, Annuity, Credit Product Coding Matrix | Our recommendation is to add sub-categories for reports in certain areas. The TOI with the most pressing concern is Long Term Care. We also request reports related to Med Supp, Life illustrations, Group Credit, and Network Adequacy. | There are increasing needs for issuers to file periodic "Reports" through the SERFF system. In many cases, the reporting is For Information Only purposes but that isn't always the case. The Department also has staff dedicated to monitoring the reports that utilize the SERFF search feature. In many cases the reports are filed under "Other" categories which diminishes the usefulness of the search feature for this purpose. | <p>Many states use a Filing Type of "Reports" for this item.</p> <p>For more granularity use Filing Labels for this information.</p> |
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