

Draft: 6/30/26

Speed to Market (D) Working Group  
Virtual Meeting  
June 17, 2026

The Speed to Market (D) Working Group of the Market Regulation and Consumer Affairs (D) Committee met June 17, 2026. The following Working Group members participated: Julie Fairbanks, Chair (VA); Maureen A. Motter, Vice Chair (OH); Mary Grover (CO); Julie Rachford (IL); Kenneth Scott (KS); Tammy Lohmann (MN); Camille Anderson-Weddle (MO); LuAnne J. King (NH); Debra Diaz-Lara (TX); Rob Lee (WA); Barry Haney (WI); and Lela Ladd (WY). Also participating were: Matthew Eberhardt and Amber Thorvilson (MT).

1. Adopted its April 23 Minutes

The Working Group met April 23. During this meeting, it took the following action: 1) adopted its Oct. 8, 2025 minutes; 2) discussed its 2026 charges; 3) received an update on the System for Electronic Rates & Forms Filing (SERFF) modernization project and the Product Steering Committee (PSC); and 4) discussed the decommissioning of the Product Requirements Locator (PRL).

Ladd made a motion, seconded by King, to adopt its April 23 minutes (Attachment **XX**). The motion passed unanimously.

2. Received an Update on the *Product Filing Review Handbook*, Chapters 1 and 2

Fairbanks reported that volunteers from Wyoming and Virginia reviewed chapters 1 and 2 of the *Product Filing Review Handbook* and submitted revisions. She stated that the revisions are currently under review and will be compiled for presentation to the Working Group.

Fairbanks indicated that the Working Group anticipates reviewing the proposed revisions at its July 13 meeting, with a vote to occur at a later date. She invited additional volunteers to assist with reviewing chapters 1, 2, or subsequent chapters and asked interested parties to contact NAIC committee support to be included in future meetings.

3. Received an Update on the Decommissioning of the PRL

Fairbanks reported that progress has been made in transitioning information from the Product Requirements Locator (PRL), including coordination to move certain state data. She stated that the Working Group is prepared to proceed with decommissioning the PRL by the end of June 2026.

Bridget Kieras (NAIC) confirmed that the decommissioning remains on track and noted that a message has been posted to notify users accessing the platform that it will be retired.

4. Heard a Presentation on CLARA

Fairbanks invited Kieras to present on the Compliance Language Assistant for Regulatory Analysis (CLARA), an artificial intelligence (AI) tool designed to assist states in reviewing insurance filings.

Kieras provided an overview of CLARA, explaining that it uses natural language processing to evaluate insurance form language against regulatory standards and is designed as a standalone application accessible through the NAIC system. She described the onboarding process for states, the rule-based framework used for training CLARA, and how the tool produces pass/fail outputs with explanatory reasoning to assist reviewers.

Kieras noted that CLARA is currently in a pilot phase, with multiple states participating, and emphasized that the tool is optional for state use. She discussed ongoing efforts to expand functionality, improve performance, and potentially integrate CLARA more fully into filing systems.

Kieras demonstrated the tool and provided examples of how to create, test, and apply rules to filings. She also discussed the anticipated impact for regulators and the industry, including improved consistency and efficiency in filing reviews.

Eberhardt and Thorvilson provided remarks regarding Montana's experience implementing CLARA. Eberhardt described early efforts to build rule groups using statutory and checklist requirements and noted that the tool shows promise in improving consistency and efficiency while allowing reviewers to focus on higher-level analysis. He stated that a human reviewer will continue to make final determinations on compliance issues.

Kieras announced that a CLARA workshop will be held in conjunction with the Insurance Summit in October in Kansas City, MO, and invited interested states to participate.

Fairbanks facilitated discussion and questions from the Working Group. Topics included considerations related to the use of AI in filing review processes and potential communication to the industry.

#### 5. Discussed Other Matters

Fairbanks referenced a recent inquiry from Colorado regarding the use of SERFF Tableau dashboards. She invited states to share whether they are using the dashboards, how they are being used, and whether there is interest in a future discussion or presentation on available reporting tools.

Kieras stated that documentation is available for each dashboard and offered to assist states seeking access. She noted that NAIC committee support welcome feedback to improve reporting tools and highlighted that SERFF data is accessible through additional platforms.

Fairbanks suggested a future presentation to further explore reporting capabilities and gather input from states.

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

## 2027 Suggested Revisions

### (A) Suggestions for Uniform Property & Casualty Insurance Product Coding Matrix

#### Suggestion# A-1:

Amend description for TOI 12.0 Earthquake to add the following language:

(Note: If coverage for earthquake is offered as an additional peril on a property insurance policy, file it under the applicable property insurance filing code.)

#### Rationale:

Similar note exists for description in TOI 02.3 Flood.

#### Things To Consider/Possible Solutions:

- If a state or two is opposed to suggestion, would the following wording be acceptable instead?

(Note: If coverage for earthquake is offered as an additional peril on a property insurance policy, file it under the applicable property insurance filing code, unless otherwise instructed by a state in its filing instructions.)

- If there is no consensus in accepting suggestion to edit description, state always has ability to add Filing Label or use State TOI field to indicate applicable property TOI to assist in filing search.

#### Recommendation regarding suggestion # A-1?

**(B) Suggestions for Uniform Life, Accident & Health, Annuity and Credit Product Coding Matrix**

**Suggestion # B-1:**

Add two new sub-TOIs to NA01 Network Access Provider Contract

NA01.005 Non-ACA Network Adequacy with the description indicating this sub-TOI is for all Non-ACA filings.

NA01.006 ACA Network Adequacy with the description indicating this sub-TOI is for annual ACA Network Adequacy filings.

**Rationale:**

Requesting state utilizes TOI code NA01 Network Access Provider Contract for both ACA & Non-ACA network adequacy filings.

To date, there is not a sub-TOI that fits both types of filings they receive.

Currently this state uses NA01.004 Other for now. The state finds this confusing to users since use same sub-TOI for both Non- ACA and ACA filers use the same filing type and coding.

**Things To Consider/Possible Solutions:**

- Do any other states receive such annual filings? Are they submitted in a non-SERFF manner?
- Do any other states utilize SERFF to receive one of both types of filings? If so, what sub-TOIs and/or filing types are used?
- Could a filing type of Annual ACA or Annual Non-ACA be used with an existing sub-TOI as a solution?
- Could the continued use of the current sub-TOI with a filing label be a solution?
- If new sub-TOIs were created, would your state activate one or both sub-TOIs?

**Recommendation regarding suggestion # B-1?**

**Suggestion # B-2:**

Add new TOI and sub-TOI(s) for Occupational & Accident Coverage to be inserted alphabetically after NA01.

TOI of OA01

Sub-TOI of OA01.0001

**Rationale:**

Requesting state indicates currently receiving such filings under H21 and this is not easily searchable. New TOI and sub-TOI are more intuitive.

**Things To Consider/Possible Solutions:**

Where are these types of products filed in other states? Are these be submitted as H02G or H02I?

Could the existing TOIs be used with perhaps description revisions to indicate these types of products should be submitted using the existing TOI?

If new sub-TOI was created, would your state activate its use?

If new sub-TOI was created, is there a need for group & individual?

If new sub-TOI(s) were created, what would be description?

If new sub-TOI was created, do we need to update description of any other TOI to direct to use new TOI?

**Recommendation regarding suggestion # B-2?**

**Suggestion # B-3:**

Deactivate sub-TOIs of H16I.004 Short Term and H16G.004 Short Term

**Rationale:**

New submissions will be filed as sub-TOIs of H15I.004 Short Term and H15I.002 Short Term.

**Things To Consider/Possible Solutions:**

Note that SERFF can search on inactive TOIs/sub-TOIs.

Current PCM descriptions of these sub-TOIs:

H16G.0004 Short Term	A major medical policy or plan designed to provide coverage during a "gap" in coverage. Short term policies generally have pre-existing condition exclusions and are not renewable. Effective January 1, 2019, this product should be filed under H15G.004 Short Term.
H16I.0004 Short Term	A major medical policy or plan designed to provide coverage during a "gap" in coverage. Short term policies generally have pre-existing condition exclusions and are not renewable. Effective January 1, 2019, this product should be filed under H15I.004 Short Term.*
H15G.0004 Short Term	Short term limited duration medical plans that are not required to comply with all state or federal mandates for health benefits. Prior to January 1, 2019, these plans were reported under H16G.004 Short Term
H15I.0002 Short Term	Short term limited duration medical plans that are not required to comply with all state or federal mandates for health benefits. Prior to January 1, 2019, these plans were reported under H16I.004 Short Term

\*This is a typo in PCM. It should direct person to H15I.002.

It is Vice-Chair's recollection that creation of new sub-TOIs in 2019 was intended to move short-term products not subject to ACA out of H16 and into H15.

NAIC staff provided the following information on the current use of the sub-TOIs.

46 instances have H16G.004 active

48 instances have H16I.004 active

32 instances activated H15G.004 since 2019

33 instances activated H15I.002 since 2019

Since 2019, the total # of filing submitted for each sub-TOI.

<b>Sub-TOI</b>	<b>Filing Count</b>
H16G.004 Short Term	1616
H16I.004 Short Term	2024
H15I.002 Short Term	305
H15G.004 Short Term	57

Based on filing activity, approving the PCM suggestion does not appear to be appropriate.

However, the suggestion leads to further discussion on these sub-TOIs.

Why did states not activate the new sub-TOIs?

Why are so many short-term products still filed under the H16 TOI?

Why are so few short-term products filed under H15 TOI?

Which TOI is the most appropriate to use in 2027?

Would revised descriptions result in increased use of H15s, if such action is desired?

Recommendation regarding suggestion # B-3?