



3. Page 17.D.2. Exhibits, first paragraph – Some state laws may not treat exhibits the same as the report. Missouri law considers the exhibits to be work papers and are, therefore, confidential. The final report is a public document in Missouri. Should this section be changed to allow this to be consistent with each state’s laws? Or that it will follow the managing lead state’s laws?
4. Page 18 – Consider changing the word “chilling” to “detrimental” or similar term that is common to insurance terminology.

### Chapter 23 – Conducting the Life and Annuity Exam

Many changes have been incorporated in this chapter and we appreciate the group’s consideration of our comments. There is one item that still stands out to us in this chapter and that is the placement of the Supplement Checklists. The existing checklists are at the end of the chapter but the new ones have been inserted immediately after the applicable standard. If the new checklists are to remain where they currently appear, then the lettering of the chapter sections should be updated to be in alphabetical order based on the physical order of items. The physical order of the items in the current draft is as follows:

- A. Operations/Management
- B. Complaint Handling
- C. Marketing and Sales (Several specialized Supplemental Checklists are available in Sections H–N of this chapter)
- K. Supplemental Checklist for Marketing and Sales Standard #10
- L. Supplemental Checklist for Marketing and Sales Standard #12
- M. Supplemental Checklist for Marketing and Sales Standard #16
- N. Supplemental Checklist for Marketing and Sales Standard #17
- D. Producer Licensing
- E. Policyholder Service
- F. Underwriting and Rating
- G. Claims (Several specialized checklists are available in Sections H–J of this chapter)
- H. Supplemental Checklist for Marketing and Sales Standard #1
- I. Supplemental Checklist for Marketing and Sales Standard #4
- J. Supplemental Checklist for Marketing and Sales Standard #8

For consistency purposes, we ask that you consider moving Supplemental Checklists K through M to the bottom or re-lettering the list so that the letters are in logical order.

Thank you again for the opportunity to provide comments and we appreciate your consideration again.

Sincerely,



Teresa Kroll,  
Chief Examiner, Market Conduct  
Missouri Department of Commerce and Insurance  
Division of Market Regulation