

on appropriate sales practices, replacement and disclosure requirements under the amended regulation.”

- 2) On pages 15, 17, and 31 of the Draft Guidelines, we recommend the following change in order to ensure consistency with the Model #275 Updates:

“The consumer has had another annuity exchange or replacement and, in particular, an exchange or replacement within the preceding ~~36~~ 60 months.”

- 3) On page 40 of the Draft Guidelines, within K. Supplemental Checklist for Marketing and Sales Standard #10, we recommend that the checklist item stating, “Nothing in this subsection restricts an insurer from ~~contracting for delegating~~ performance of a function (including maintenance of procedures) required under this subsection” be changed back to the language from the April 19, 2022, draft. The “contracting for” language is consistent with Model #275 and using a different term here could cause confusion about the insurer’s responsibilities, and as such, we recommend leaving “contracting for” and removing “delegating”.

Finally, we noted some instances in the Supplemental Checklists where the phrase “the insurer’s and applicable producer’s system of annuity suitability supervision” was used. Since the Supervision System provisions of Model #275 only pertains insurers, we’d suggest this phrase be adjusted accordingly to ensure consistency and avoid confusion.

On behalf of IRI and our members, thank you again for the opportunity to provide these comments, and we appreciate your consideration of our recommended changes. We would be happy to discuss further with you and look forward to collaboration and partnership with the Working Group.

Sincerely,

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