**From:** Cook, Jennifer R.   
**Sent:** Wednesday, July 28, 2021 3:59 PM  
**Subject:** Request for comments on LIIIWG   
**Importance:** High

Life Insurance and Annuities (A) Committee request for comment and feedback on the work of the Life Insurance and Illustration Issues (A) Working Group:

**Background:**  Since 2016, the Life Insurance and Illustration Issues (A) Working Group has been working on a one- to two-page policy summary to fulfill its charge to “[e]xplore how the narrative summary required by Section 7B of the Life Insurance Illustrations Model Regulation (#582) and the policy summary required by Section 5A(2) of the Life Insurance Disclosure Model Regulation (#580) can be enhanced to promote consumer readability and understandability of these life insurance policy summaries, including how they are designed, formatted and accessed by consumers.  The Working Group has completed draft revisions to the Life Insurance Disclosure Model Regulation (#580) adding a policy overview disclosure requirement for term life policies, as well as a sample policy overview.  Two versions of the revisions to the model have been developed.  One version keeps the delivery timing requirements currently in the model for delivery of the life insurance buyer’s guide—at the time of application, or if there is a free look period, at the time of policy delivery. A second version mirrors the buyer’s guide delivery timing requirements in the Annuity Disclosure Model Regulation (#245)--delivery at or before the time of application. The Working Group has asked the Life Insurance and Annuities (A) Committee to provide guidance on 1) whether the Working Group should continue to develop a policy overview document to achieve its charge of improving the understandability of the life insurance policy summaries; and 2) if the answer to question 1) is yes, when should it be delivered to consumers.

To assist the Life Insurance and Annuities (A) Committee members in this task, the Committee is **requesting specific comments from regulators and interested parties on how these two questions should be resolved, and why.**

In particular, please include in your comments your specific answer to question 1) below and include, either way you answer, why, or why not.  If you do not think the Working Group should develop a policy overview to accomplish its charge, please include how you suggest the charge should be accomplished.

With respect to question 2) Comments should include feedback on both alternatives that have been developed by the Working Group.  Please include your reasoning with respect to each.  **We encourage you the use the following format for your comments, but it is not required.**

**Please send comments to** [**jcook@naic.org**](mailto:jcook@naic.org) **by close of business ~~Monday, August 9,~~ Wednesday, Aug. 11, 2021**

**QUESTION 1**

1. Do you support the development of a short policy overview document for the working group to achieve its charge?  Yes or No.

If yes, please explain why.

If no, please explain why and address how the charge should be fulfilled.

**Please proceed to Question 2.**  (The Committee is interested in feedback on Question 2, even if you answered “No” to Question 1.)

**QUESTION 2**

2a.          Do you prefer the revisions to Model #580 using the current delivery requirement in the model? Why? or Why not? (Refer to DRAFT April 20, 2021 (Current Delivery Requirement) 1-A)

2b.          Do you prefer the revision to Model #580 requiring delivery of the policy overview at the time of application? Why? or Why not? (Refer to DRAFT April 20, 2021 (At Application) 1-B)

Let me know if you have any questions.

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