EXPOSURE

NAIC Life Insurance and Annuity Illustration Working Group Exposure: Sep 15, 2026

The Working Group requests Model 245 proposals that incorporate the conceptual decisions made by the working group. Please submit the following by November 10, 2026:

- One-page memo that succinctly describes the proposed changes
- Mock-up of the resulting illustration, including any visual examples or concepts associated with the proposal
    - If a mock-up is not conducive to explaining the proposed changes, then additional descriptions or a redline of Model 245 may be provided; however, a mock-up/visual is preferred, as appropriate

All proposals should incorporate the following preliminary conceptual decisions made by the Working Group:

1. ***Reduce illustration length*** through standardized requirements across carriers and products that reduce the illustration ledger length, combine illustration ledgers into single tables, and provide fewer redundancies between sections of Model 245

2. ***Include a signed attestation by a company officer*** to provide individual accountability for appropriate compliance with Model 245 requirements

3. ***Do not permit hypothetical returns*** for historical years during which an index did not exist, even if any input components to the index existed during those years

4. ***Either do not rely on illustrating non-guaranteed elements*** and/or historical index data (preferred by Working Group) ***or***, if illustrating with historical index data, ***include adjustments or haircuts to the current level of non-guaranteed elements***

5. ***Provide supplemental information*** through the following:
    - A one-period index term calculation of interest credited if the index goes up or down by a specified percentage (e.g., +/-20%); or
    - Tables and/or visuals of alternate scenarios; and/or
    - If the proposal continues to include up/down scenarios in the illustration ledger, use the guaranteed scale as the “down” scenario