NAIC SERFF

Project Update
LHCA 2026
San Antonio, TX

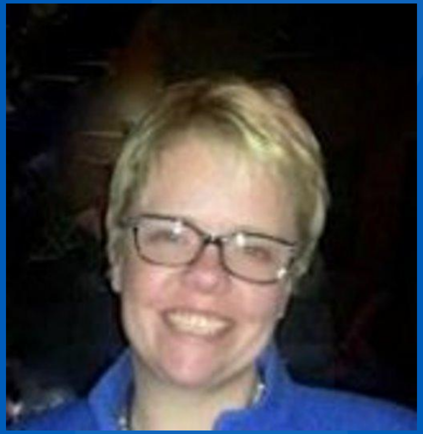
NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

About Anna:

Anna Dysart
Business Analyst II

Anna Dysart is an NAIC Business Analyst supporting the SERFF Modernization project. She works with State Regulators, Industry stakeholders, and internal development teams to gather requirements and help shape the platform’s future.

About Bridget:



Bridget Kieras
Senior Product Manager

Bridget Kieras is a Senior Product Manager with the NAIC's Filing Solutions department, where she focuses on advancing the System for Electronic Rates and Forms Filing (SERFF) application and its modernization. She leads efforts to enhance SERFF's usability and regulatory support, guiding stakeholders through technical updates and strategic improvements as part of NAIC's technology initiatives.

Drivers for Change

Operational Efficiency	• Organizations increasingly resource constrained • Loss of business and process knowledge • Need to move from data entry to analysis
Product Complexity & Innovation	• Increase in innovative and complex products • Need advanced tools to support submission and review of these products
Technological Advances	• Current architecture makes integration difficult • Modern technology provides needed capabilities

One Year

Live in Production

The Insurance Compact launched on the modernized platform in 2025, pioneering the new system - an important first step in SERFF's Modernization journey.

Partnering Forward

With Industry & States

Continuing to refine features for the Insurance Compact and their filers while working closely with the States on their specific requirements, validations, and migration readiness.

Continuous Improvements

Deployed Since Launch

Enhancements across filing workflows, communication tools, user management, and API integrations — all informed by direct feedback from the Compact and industry filers.

Roadmap to Adoption

Why the Compact First?

Strategic Rationale:

- As a large, complex project, the initial launch needed to be targeted and controlled
- The Compact operates as a single entity with one set of business rules vs. 50+ state-specific configurations
- Smaller, well-defined user base allowed for "white glove" support during transition
- Compact was a collaborative partner that worked closely with the team throughout development and Year 1 challenges

Paving the Way for States:

- Compact served as the "innovator" in a product adoption curve model
- Lessons learned shaped a staggered rollout – shifted from all states at once to an early adopter approach
- Feedback from Compact and filers is driving refinements before broader state deployment
- Base functionality, migration processes, and training approach can be fine-tuned for states that follow

Pivot to an Early Adopter Model

Why We Shifted:

- Original plan: migrate all Life/Annuity/Credit states in a single release after the Compact
- Key lesson: moving all states at once creates too much risk – change management, state-specific rules, and complex migration need a deliberate approach

Advantages:

- “White glove” support for regulators and filers
- Rapid feedback loops to refine the platform before broader rollout
- Increasing speed as migration and launch processes mature

How States Were Chosen:

- States were evaluated against technical and engagement criteria
- Finalized a group of 10 early adopter states

Goal:

- States that will help drive change and innovation in SERFF
- Move states to the new platform iteratively for rapid feedback
- Manage risk and continue to provide excellent support and resources

What Filers Need to Know

During the Transition:

- You'll file in both legacy and new SERFF until your states fully transition
- Historical filings migrate; legacy version becomes read-only
- Draft filings do not migrate – submit before cutover or recreate in new system
- 30 days' advance notice before each state's cutover date

Training & Support:

- Partial hands-on sessions, videos, and written documentation
- Enterprise Copilot for in-platform guided assistance

Stay Informed:

- SERFF notifications and targeted emails for cutover updates

The Product Adoption Curve

WE ARE HERE

COMPLETE	IN PROGRESS	UPCOMING	FUTURE
Innovators Insurance Compact	**Early Adopters** 10 Selected States	**Early Majority** Next Wave of States	**Remaining States** Bulk Migration

Innovators

- Insurance Compact selected as first adopter
- Full platform validation completed
- Lessons learned applied to next phases

Early Adopters

- 10 states selected via technical & engagement criteria
- Staggered implementation dates
- 30 days' advance notice before each state's cutover

Early Majority

- Additional states onboarded in cohorts
- Informed by early adopter feedback
- Expanded training and support resources

Remaining States

- Remaining states transition to new platform
- Legacy SERFF fully retired
- Single unified filing system nationwide

Early Adopter States

Property & Casualty

- Arizona
- Arkansas
- Connecticut
- Maine
- Missouri
- Nebraska
- North Dakota
- Vermont

Life, Accident & Health*

- Arizona
- Arkansas
- California
- Nebraska
- North Dakota
- Oklahoma

**ACA-related Types of Insurance (TOIs beginning with "H" or "NA") will temporarily remain in legacy SERFF due to CMS integrations and Plan Management dependencies. These TOIs will migrate at a later date.*

BREAKING NEWS

Northern Mariana Islands: Direct to New SERFF

What's Happening:

- CNMI is joining SERFF for the first time – going directly onto the new platform
- Filings currently handled via paper and email will transition to electronic submission
- Implementation tasks are beginning; launch date is TBD

Who Files in NMI:

- Around 14 domestic and 40+ foreign insurance carriers licensed in CNMI
- 2 alien insurers with active filings
- Health insurance filings make up the majority of submissions

What to Expect:

- Companies will file rate and form submissions through new SERFF
- Onboarding and training provided as CNMI goes live

Adoption Timeline

WE ARE HERE

2024 - 2025	Late 2026 - Early 2027	2027	TBD	TBD
Compact	**Early Adopters**	**Cohort 2**	**Remaining States**	**Plan Mgmt**
Innovators	10 States	Next Wave	Bulk Migration	H & NA TOIs
Platform validation with Insurance Compact	Staggered rollout for selected state instances	Selection in process May include additional instances from EA states Likely larger than EA phase	All workload in new system except H and NA TOIs and Plan Management	Final transition and retirement of Legacy SERFF
COMPLETE	IN PROGRESS	UPCOMING	FUTURE	PLANNING

Special Considerations for Plan Management

Which TOIs Are Affected:

- All TOIs beginning with “H” or “NA” temporarily remain in legacy SERFF
- These TOI prefixes cover more than just ACA products – but splitting at the prefix is the cleanest line for the transition

Why:

- Migration requires coordination with federal systems – requirements being defined in 2026
- Plan Management cycle cannot afford disruption

Impact on Filers:

- H and NA TOI filings stay in legacy SERFF for now
- Likely scenario is that all H/NA filings and Plan Management move at the same time for all states

Platform Highlights & Future Enhancements

Closing the Gap

Our approach to growing the platform

- Build a stable core, then add the highest-impact capabilities in waves
- Address usability and "quality of life" quick wins along with major changes
- Rethink legacy (“as-is”) features—redesign to improve or reinvent, not replicate
- Ship frequent releases, iterate based on feedback and metrics

Performance

Improving responsiveness and processing speeds so the system scales with usage growth.

✓ What We've Delivered

Platform Stability & Monitoring Improvements
Expanded visibility into performance signals to identify and address hotspots early.

Background Processing Enhancements
Better handling of long-running tasks so users can continue while processing completes.

Faster Loading & Navigation
Reduced load times through smarter caching and more efficient data retrieval.

▶ What's Next

Enhanced ML Model for Form Uploads
Machine learning to further reduce manual entry on uploaded forms

Continued Response Time Improvement
Contract focus on improving response time and ensuring new features meet performance standards.

Scalability For More Concurrent Users
Continued work to support growth in usage while maintaining consistent responsiveness during peak periods.

Reduction of Clicks
Consolidate information and reduce steps withing existing processes.

User & Contact Management

Streamlining how companies manage access, authentication, and administration across NAIC products.

✓ What We've Delivered

Self-Service User Management
Add, modify, or remove users directly in the platform

Okta Single Sign-On
One secure Okta ID across legacy and modernized SERFF

Removed Separation of Contact and User
Filing contact is now an active user and can be changed post submission

Improved Access Control
Less restrictive by default and support for different access by instance

▶ What's Next

Additional Roles and Permissions
More granular permission controls for different user types and organizational roles

Accommodation for Demographic Changes
One place to update information like name and phone number

Company Level Contacts
Ability to add contacts that are not filers and reuse across filings

Filing Preparation & Reusability Tools

Streamlining the filing process with validation, automation, and tools that let filers reuse prior work.

✓ What We've Delivered

Streamlined Filing Wizard
Compact filing reduced from 10 screens to 3

Multiple TOI Filings
Submit multiple Types of Insurance per filing type

License Checks
NAIC data source used to verify licensing

Pre-Submission Check
System validation that catches common errors before filings aresubmitted, reducing revision cycles and reviewer workload

▶ What's Next

Modifying TOI and Sub-TOI
Allow TOI and Sub-TOI to be changed after submission

Filing Projects
Group related filings into organized project sets for coordinated tracking

Copy & Reuse Filings
Duplicate previous filings to pre-populate new submissions

Template-Based Filing
Reusable templates to standardize common submission types

Shift Left Validations

Helping insurers submit more compliant filings to reduce review time.

✓ What We've Delivered

Configurable Rules Engine

Configurable rules per jurisdiction with prompts to guide filers

Automatic Fee Calculations

Fees auto-calculated for most Compact States, reducing manual work and speeding up filings

Overpayment Warnings

Alerts flag potential overpayments before submission, helping avoid costly errors

▶ What's Next

Early Adopter State Rules

Implementing state-specific validation rules, TOI configs, and requirements for 10 early adopter states

Full State Fee Coverage

Extending automatic fee calculations to all Compact States and preparing rules for early adopter instances

Amendments

Supporting updates to filings while reducing reviewer and filer effort over time.

✓ What We've Delivered

Comment-Only Responses

Eliminated the need for placeholder changes when a response does not require any schedule item revisions

Cross-Component Warnings

Filers are now informed when compliance issues exist in other components, making it easier to address all CIs in a single amendment

Partial Accept/Decline for Reviewers

Streamline how Regulators review responses that may partially meet compliance

▶ What's Next

Improved Usability

Discussions ongoing regarding changes and improvements prior to state implementations

Responding on Different Components

Allow filers to respond to compliance issues with changes to other Forms, Supporting Documents, or Filing areas to achieve compliance.

Statement of Intent (SOI)

Addressing SOI challenges from the Compact launch and building a better experience for filers and reviewers.

✓ What We've Delivered

Bulk Upload on Draft Filings

Excel upload template available for draft filings – in pilot.

Certification moved to Support Document

Allows for easier management of changes.

▶What's Next

SOI File Upload Extension

Extend bulk upload to submitted filings

Move SOI Outside Amendments (tentative)

Reclassify SOI changes to work like Associated Filings, allowing filers to update directly without the accept/decline cycle

ZipPDF (PDF Pipeline)

Modern replacement for the PDF pipeline to improve packaging, handling, and access to filing outputs.

What We've Delivered

Pilot Delivered

Industry and Compact regulator pilot to validate the functionality and end-to-end flow.

What's Next

ZipPDF for all Compact Filers

Moving from a pilot phase to production for all industry compact filers

Download/Export Compliance Issues

Enable users to download or export compliance issues outside current in-platform functionality.

Notifications and E-mail

Expanding how filers and reviewers stay informed throughout the filing lifecycle.

✓ What We've Delivered

E-mail Notifications

Automated e-mail alerts keep filers and reviewers informed of filing activity, status changes, and important updates

Task Management Visibility

Team workload and activity tracking so managers can monitor progress and prioritize assignments

▶ What's Next

In-Platform Activity Notifications

Real-time alerts within SERFF so users can act on filing updates without switching to e-mail

Configurable E-mail Preferences

User-level controls to choose which filing events trigger e-mail notifications, reducing inbox noise

AI in SERFF

What is CLARA?

NAIC's AI-powered tool for automated regulatory form review, built to support faster, more consistent filing decisions.

🔍 What CLARA Does

Automated Form Analysis

Uses AI to read and analyze insurance product filings, identifying potential compliance issues

Regulator Trained

Trained by regulators on state-specific laws and requirements, ensuring reviews reflect actual regulatory standards

Built Inside NAIC Infrastructure

Operates within NAIC's secure environment, keeping filing data and regulatory logic secured

📋 Key Design Principles

Regulator-Led AI

CLARA is built by and for regulators — not a third-party vendor product — ensuring alignment with regulatory mission and priorities

Augment, Not Replace

Designed to assist human reviewers by surfacing insights and flagging issues, not to make autonomous approval or denial decisions

Continuous Learning

Improves over time as regulators validate outputs and refine the model against real-world filing review outcomes

How CLARA Supports the Filing Process

Integrating AI assistance at key points in the review workflow to improve speed, consistency, and accuracy.

For Filers

Faster Review Turnaround

AI-assisted analysis helps regulators work through filings more efficiently, reducing the time filers wait for feedback or approval

Fewer Revision Cycles

When regulators catch issues faster and more consistently, filers receive clearer, more complete feedback in fewer rounds

For Regulators

Front Line Review Assistant

AI can easily handle most checklist rules, helping reviewers focus their expertise where it matters most

Consistency Across Reviewers

CLARA provides a shared analytical baseline so that different reviewers apply rules and interpretations more uniformly

Scalable Oversight

As filing volume grows and staffing changes, AI augmentation helps maintain review quality without proportional staffing increases

What This Means for Industry

CLARA represents a shift toward AI-enabled regulatory oversight — here's what filers should expect going forward.

✅ Near-Term Impact

No Change to Filing Workflow

CLARA works behind the scenes on the regulator side — filers continue to submit through the same modernized platform with no new steps required

Improved Feedback Quality

Expect more specific, consistent compliance feedback as AI helps reviewers identify issues with greater precision and less variability

Faster Speed to Market

AI-assisted reviews reduce bottlenecks in the approval pipeline, helping compliant products reach market sooner

🔮 Looking Ahead

Expanded Coverage

CLARA capabilities will grow as more states migrate to the modernized platform and additional lines of business are incorporated

Shift Left Analysis

As confidence in CLARA's output grows, analysis can be triggered before submission to help filers get it right the first time

Transparency and Governance

NAIC is building oversight frameworks for AI in regulation, ensuring the tool operates with accountability and clear governance standards

Beyond CLARA: Additional AI Opportunities

Practical ways AI could make filing and review easier for everyone using the platform.

🚀 The possibilities are (nearly) endless!

- ✓ **Catch Issues Before You Submit —** Flag common mistakes and missing information before your filing reaches a reviewer.
- ✓ **Drafting Assistance –** Suggest language for Filing Descriptions, Amendments Comments, and more.
- ✓ **Plain Language Chat & Search —** Type a question like "my last auto rate filing in Texas" instead of filtering by codes and dates. Ask about state requirements or specific filings.
- ✓ **Smarter Work Queues —** Prioritize which filings need attention first, whether you're tracking responses or managing a new filing project.
- ✓ **Read and Sort Uploaded Documents —** Automatically classify and tag documents when you upload them, saving manual classification.

Q&A

NAIC SERFF

System for Electronic Rates and Forms Filing