Creating a Filing
for the
Interstate Insurance Product Regulation Commission (IIPRC)

Before you begin: To make an IIPRC filing, an industry user must have certain roles assigned to their ID. If you do not see the “Create Compact Filing” link in Step 1 and you have paid your IIPRC Annual Registration Fee, contact the SERFF Help Desk at serffhelp@naic.org.

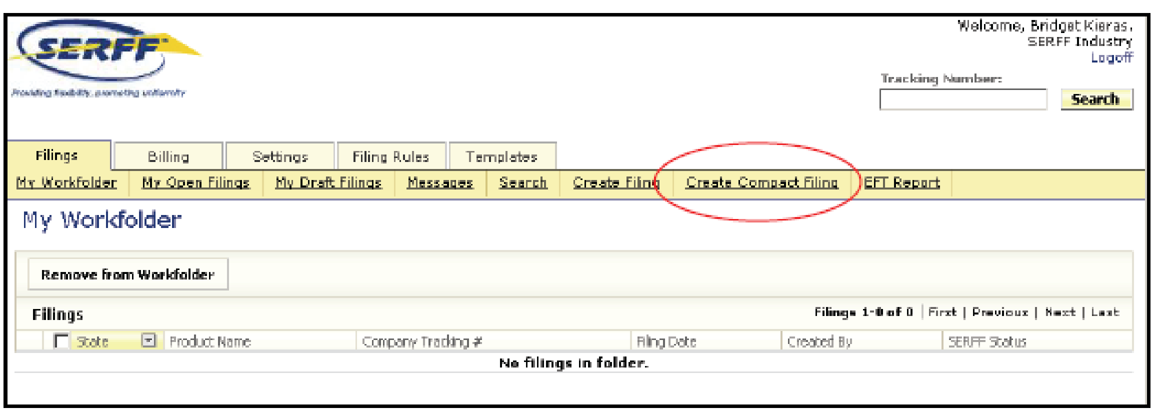
The IIPRC requires that all filing fees be paid via EFT. Please make sure that the IIPRC is noted as an authorized debtor, otherwise the fees will not be transmitted to the IIPRC properly.

These instructions provide specific elements to assist with the submission of a product filing through SERFF to the IIPRC and are intended to be used with those that are applicable to SERFF filings as provided in the SERFF User manual. Therefore, it is assumed that you already have a working knowledge of the SERFF application. If you don’t, or need additional help, we recommend you download and review the SERFF User Manual, available under “Help” in SERFF.

Please note, as you begin your work in SERFF, it is recommended that you check the General Instructions as there may have been recent updates. Also be sure to review the IIPRC’s website for the most up-to-date information on Uniform Standards, Filing Information Notices (FINs), and other resources available, or use the links provided in our Submission Requirements and Filing Rules.

The IIPRC Filing Wizard

1. To begin an IIPRC filing, click the “Create Compact Filing” link under the Filings tab.

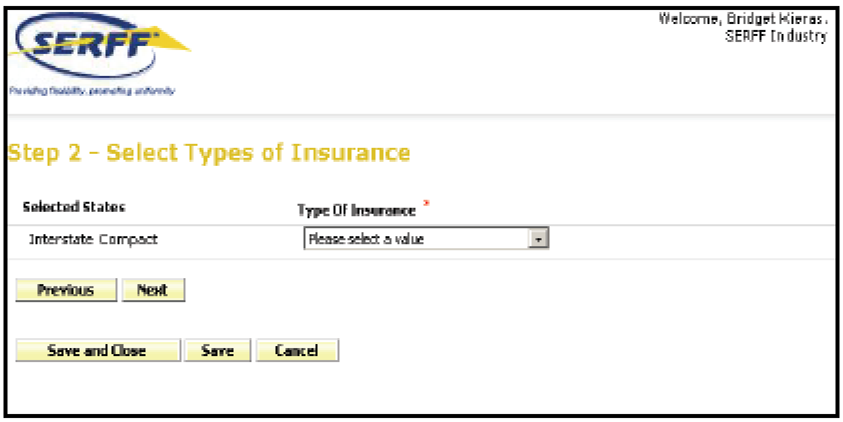


2. The first step SERFF Filing Wizard will display and look familiar except that the Business Type cannot be changed from "Life, Accident/Health, Annuity, Credit". The IIPRC does not accept Property/Casualty filings.

3. Step 2 in the IIPRC Filing Wizard is the selection of the Type of Insurance. The IIPRC has been pre-selected as the "state" for this filing – the ability to include participating states will come later.

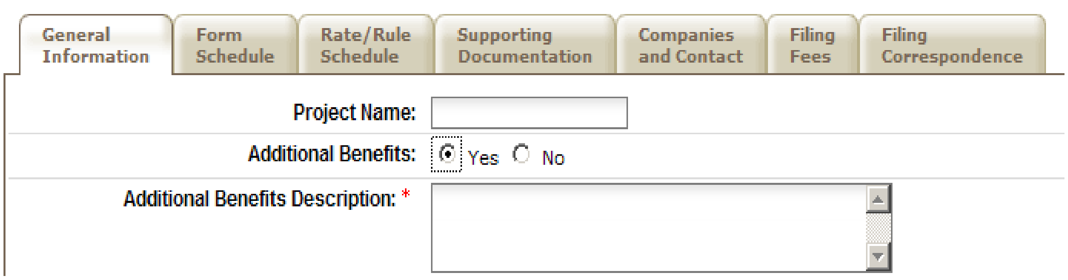
   The Types of Insurance (TOI), from the Product Coding Matrix (PCM), for the various products that are currently accepted by the IIPRC will be available for selection.

   Use the TOI Link, found on the Insurance Company Resources Page to match up your TOI and Sub-TOI with the appropriate IIPRC Uniform Standard(s) for your product.

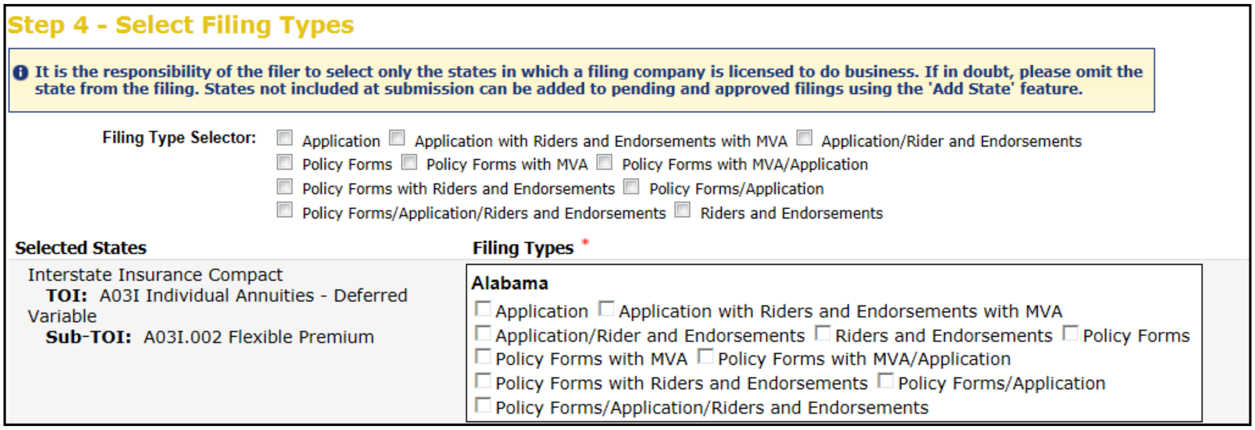


4. After selecting the TOI, click the "Next" button and select the appropriate Sub-TOI.

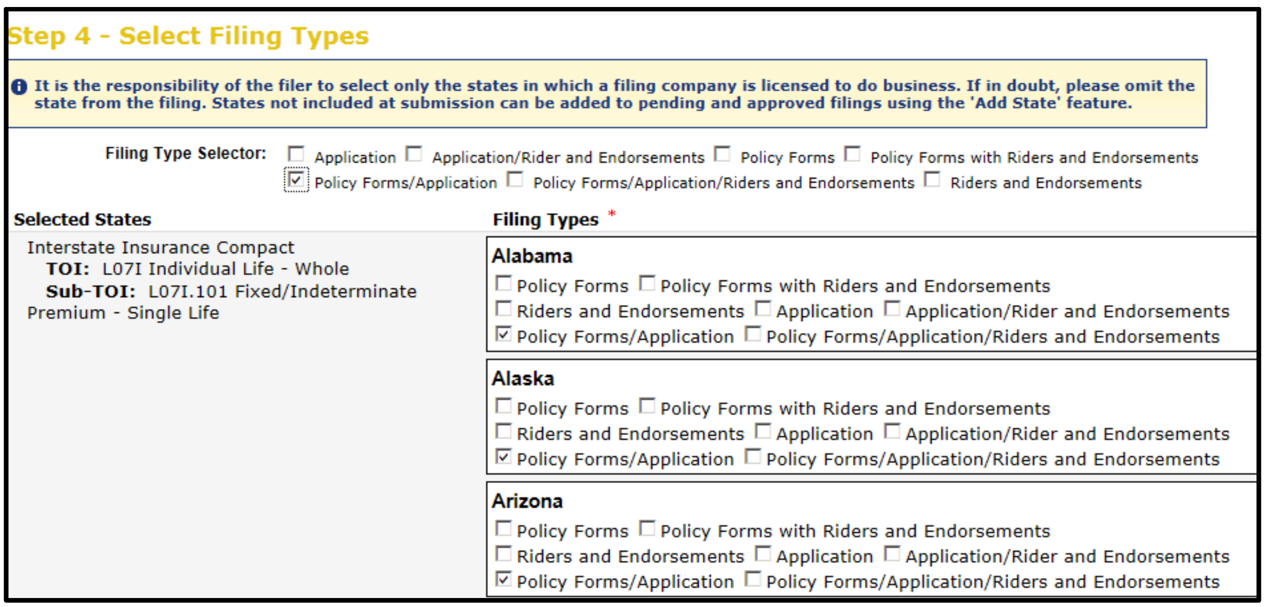
5. Step 4 in the IIPRC Filing Wizard is to indicate whether or not the filing has additional benefit features. Only need to indicate "yes or no" and then enter a description into the description field. Note that if the filing is a combination product, meaning that it includes multiple TOIs, the information should be provided here.



6. Step 5 in the IIPRC Filing Wizard is to select the Filing Type. All of the Filing Types that are accepted by the IIPRC for the previously selected TOI and Sub-TOI will be available for selection. <u>Note that Submission and Product Requirements are particular to Filing Types</u>. Therefore, it is important to select the correct Filing Type.



7. Once a Filing Type has been selected, all available participating Compact states will be marked as included. Uncheck any state(s) that should not be included in this filing. Only States in which the company is licensed and for which the filing is intended to be effective should be checked. IIPRC registration does not supersede the licensing requirements of the States.



8. Exclusions for the selected product (TOI/Sub-TOI/Filing Type) will be listed at the bottom of the page. There are two types of exclusions.
   - State opt-outs for IIPRC standards - In these cases, the state has passed legislation or issued a regulation to opt-out of a particular product. The product cannot be filed under the Compact for that state. **NOTE**: Arizona, Hawaii, Indiana, Montana, and New Jersey have opted out of all Long-Term Care Insurance Uniform Standards. There are a select handful of states that have opted not to permit filings submitted under the Rate Filing Standards for Individual Long-Term Care Insurance - Modified Rate Schedules. Additionally, Montana has opted out of all Disability Income Insurance Uniform Standards More information may be found on the Record page of the IIPRC website.

- SERFF instance exclusions – When a state has split their Life and Health business units into two SERFF instances, the system must be instructed as to the instance to which a filing should be directed. This is done by excluding the non-applicable instance. As an example, for a Life filing, the Georgia Health instance will be excluded, but Georgia will still be available for selection.

Exclusions:

Georgia:
Please note that the Health instance of this State does not include Life and Annuity products. Georgia does participate in Life and Annuity Products for the IIPRC.

Kansas:
Please note that the Health instance of this State does not include Life and Annuity products. Kansas does participate in Life and Annuity Products for the IIPRC.

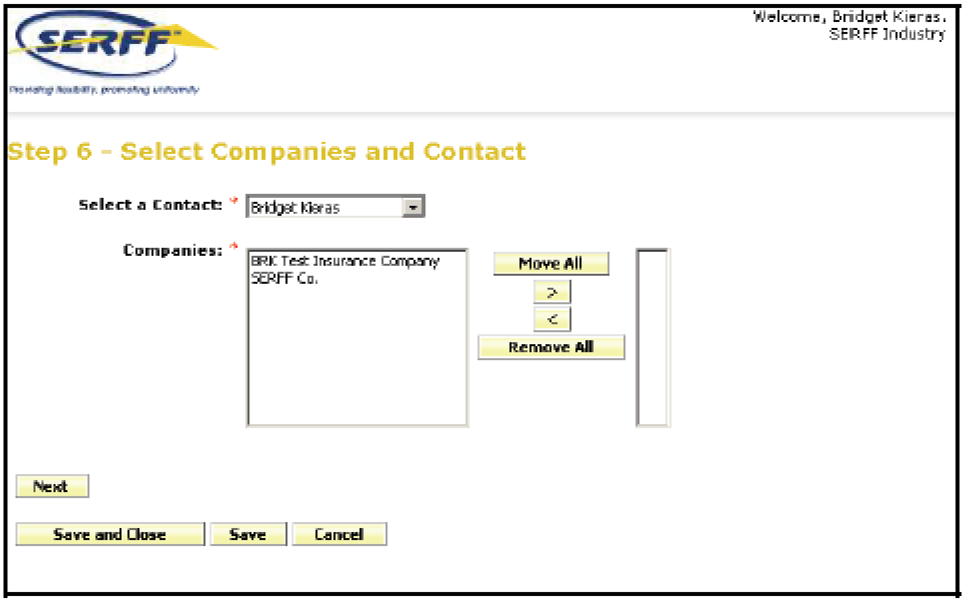
9. Step 6 is a summary screen. Carefully review the information displayed, including the states listed, as the selections cannot be changed after they are saved. If you are unsure as to whether a state should be included, it is best to exclude the state. Note that additional states can be added to the product filing submission during the product review and/or following approval. Click the "Previous" button to navigate back through the Filing Wizard to make corrections. Click the "Save and Continue" button to lock in these selections.

Step 5 - Confirm Selections

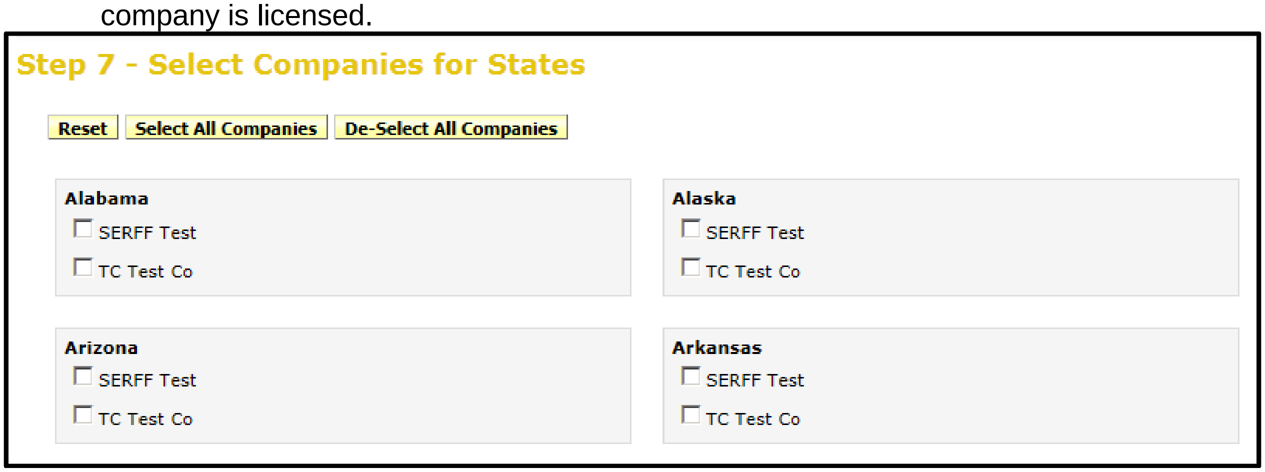
Please review the included state selections as this is the last opportunity to remove a state from the filing submission. Only states in which a filing company is licensed to do business should be included.

State	TOI	Sub-TOI	Filing Types	States
Interstate Insurance Compact	L07I Individual Life - Whole	L07I.101 Fixed/Indeterminate Premium - Single Life	Policy Forms/Application	AK , AL , AR , AZ , CO , GA , HI , IA , ID , IL , IN , KS , KY , LA , MA , MD , ME , MI , MN , MO , MS , MT , NC , NE , NH , NJ , NM , NV , OH , OK , OR , PR , RI , SC , TN , TX , UT , VA , VT , WA , WI , WV , WY

10. Step 6 is the selection of Companies and a Contact for the filing. All companies to be included in this filing should be selected here, regardless of the licensing status in various states as edits may be made in the next step. Only one contact may be selected.



11. Step 7 allows the filer to match companies with states, according to the proper company license for each state. Although the filing is being made to the IIPRC, the filer must still indicate which companies apply to the selected participating states. As in Step 4 the participating states appear as options for selection, only select those states in which the company is licensed.



12. Step 8 is the Default Filing Data page. These fields should be completed as appropriate or may be completed/changed on the filing prior to submission. The Filing Description field is the "cover letter" for the filing and should provide detailed information about your product and the filing. Please do not upload a separate cover letter as an attachment to a new filing. The Filing Description should include:
    a. A concise, detailed description of the filing;
    b. A listing of the forms identified by name and purpose;
    c. Identification of the Uniform Standard applicable to each form used to make the submission. Verify that the product(s) being submitted comply with the applicable uniform standard(s) which can be found on the [Record](#) on the IIPRC website.

d. Identify and explain any unique or innovative features of the product, including how those features comply with the applicable uniform standards.

13. Step 9, the last step of the Filing Wizard, is the Final Filing Summary. In most cases regarding the IIPRC, a single filing will be created. Review the information and click “Previous” to correct the companies listed or the company state association. This information cannot be changed after clicking “Finish”. Clicking “Finish” will take the user into edit mode on the newly created IIPRC filing.

Step 9 - Final Filing Summary

State	TOI	Sub-TOI	Filing Types	Companies
Interstate Insurance Compact	L04I Individual Life - Term	L04I.003 Single Life - Single Premium	Policy Forms	[redacted] (AL , AK , AZ , AR , CO , GA , HI , ID , IL , IN , IA , KS , KY , LA , ME , MD , MA , MI , MN , MS , MO , MT , NE , NV , NH , NJ , NM , NC , OH , OK , OR , PA , PR , RI , SC , TN , TX , UT , UT , VT , VA , WA , WV , WI , WY , WY)

Previous Finish

Cancel

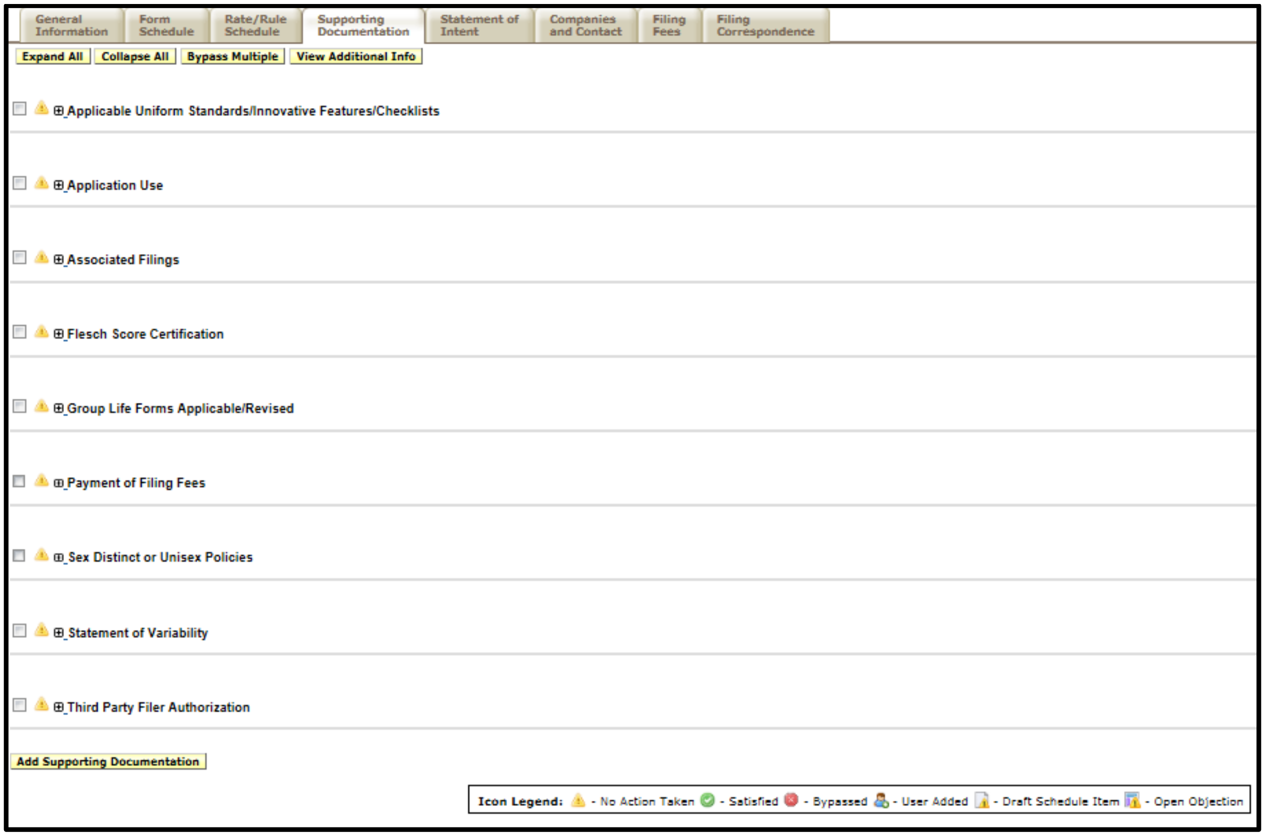
Completing and Submitting an IIPRC Filing

1. The process for completing and submitting a product filing to the IIPRC is similar to the process of completing and submitting a single state filing, to include the method for satisfying or bypassing Submission Requirements. However, there are some unique features in the tabs in SERFF for an IIPRC filing. Each is described below.

   Rate / Rate Schedule – This tab should be used for all LTC and DI submissions only; Life and Annuity submissions submit under Supporting Documentation. All rates and rating information submitted for either initial or revised rates for Long Term Care (LTC) or Disability Income Insurance (DI) products, should be provided under the Rate/Rule Schedule tab. The information provided may be updated post-submission. Items to be included are the: Actuarial Memorandum, Assumptions Excel worksheet (prepared using the sample available on the IIPRC Insurance Company Resources page), rate schedules, and other rate data applicable to the filing. Any of these elements contained within the actuarial memorandum should also be broken out as separate rate data items by completing the steps described in the SERFF Submission Requirements.

   If you are filing a Rate Revision, the policy forms with which the revised rates will be used must be identified. Forms may not be necessarily included in these submissions. Rate revisions (increases) will be submitted in varying scenarios. A separate filing type is necessary to specify the filing elements requirements and information. This will help track revised rate filings and information contained therein, including percentages that exceed the rate increase threshold, IIPRC action levels and Member State actions. It will also provide easier access to rate revision information by member states and consumers. Select “Rates – Revised Rates” which has been added to the IIPRC SERFF instance.

   The Supporting Documentation tab – The requirements that are listed under the Supporting Documentation are unique to the IIPRC. The State submission requirements do not factor into an IIPRC filing and therefore are not provided. Each required element under the Supporting Documentation tab for the product(s) is contained within the applicable Uniform Standards. The examples provided below are just some of the applicable Submission Requirements. Please review the applicable product line Uniform Standards for all required Submission Requirements. Additionally, the inclusion of the Submission Requirements is dependent on the selection of the TOI and Filing Type, please select the correct TOI and Filing Type. Questions regarding the Submission Requirements should be directed to the IIPRC Office.



A. Actuarial Memorandum - If the Life or Annuity product requires the submission of an actuarial memorandum, the requirements will be set forth in the Additional Submission Requirements section of every applicable Uniform Standards. Note that for LTC and DI filings, the Actuarial Memorandum is included in the Rate/Rate schedule Tab.

B. Applicable Uniform Standards/Innovative Features/Checklists – As noted earlier, any unique or innovative features of the product, including how those features comply with the applicable Uniform Standards must be explained. Use this Submission Requirement to provide this information when an explanation is necessary to explain product features and Uniform Standards applicability. If the information is NOT provided here, it MUST be provided in the Filing Description. Do not mark this Submission Requirement as “Bypassed”.

C. Application Use – The requirements as to how the applications are to be used are found in the Additional Submission Requirements section of every applicable application Uniform Standards. You must provide a statement as to how the application will be used and include a description of the process that will be used to verify the authenticity of the transaction. A John Doe sample should be included.

D. Associated Filings – This Requirement serves as a reminder that the Associated Filings for this Compact submission need to be made using the View Associated Filings in the Filing Wizard. Section 103(d) of the Operating Procedure for the Filing and Approval of Product Filings requires that at “the time a Product Filing is made, the Product Filer shall identify whether the Product Filing will be used with a Commission Product Component previously approved by or pending with the Commission.” Detailed directions regarding the completion of the Associated Filings is found on the IIPRC website, namely the Insurance Company Resources page.

E. Flesch Score – Unless specified otherwise, all IIPRC forms must have a minimum Flesch Score of 50. This requirement may be found within the Additional Submission Requirements section of the applicable Uniform Standards. A statement and a signed certification must be attached.

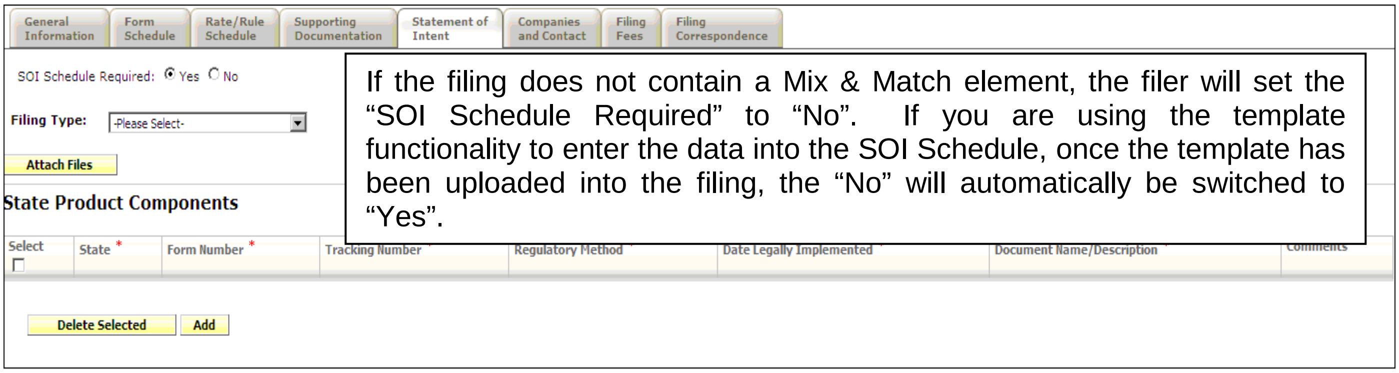
F. Sex Distinct or Unisex Policies - State whether the policy is sex-distinct or unisex. If sex-distinct, the company shall confirm that the policy will not be issued in any employer-employee plans that are subject to the Norris decision and/or Title VII of the Civil Rights Act of 1964. If Montana is included in this filing or added to the filing after approval, please confirm that the company will issue the forms included in this filing to Montana residents on a unisex basis only, and will not issue to Montana residents on a sex-distinct basis.

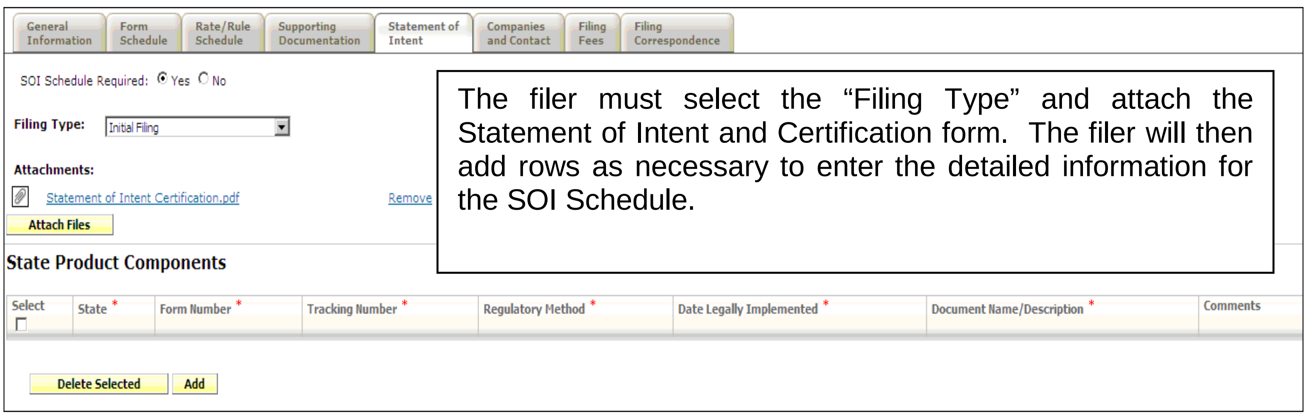
G. Statement of Variability and Contract Specification Pages - The requirements for each are in the Additional Submission Requirements section of every applicable Uniform Standards. Be careful to make these elements consistent with the actuarial memoranda and the forms. You must attach a detailed listing of all variable items, and certify to it. Be sure to have the specifications page consistent with the rest of the filing.

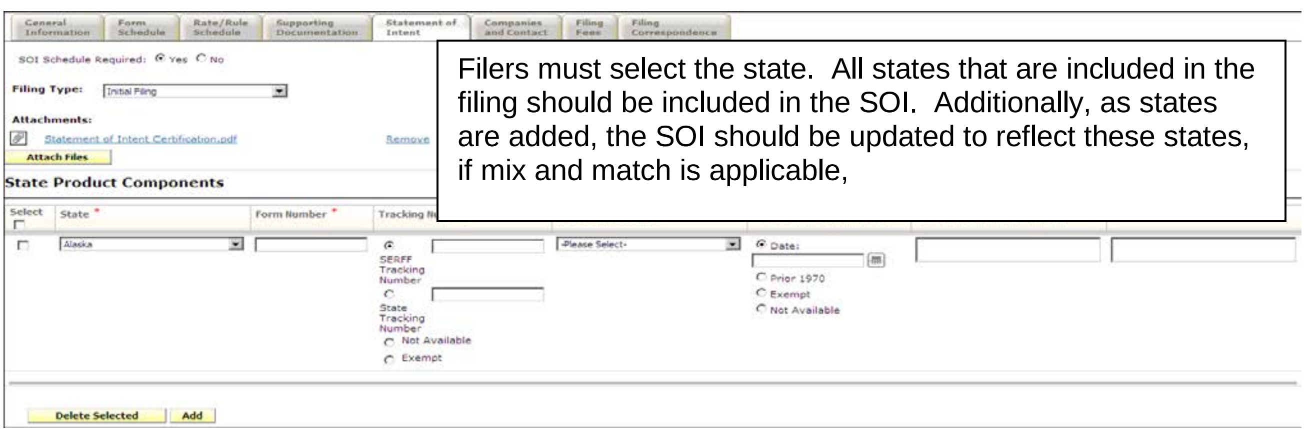
H. Third Party Authorization - If a third party filer is used to make the filing, a signed authorization on the company stationery must be attached.

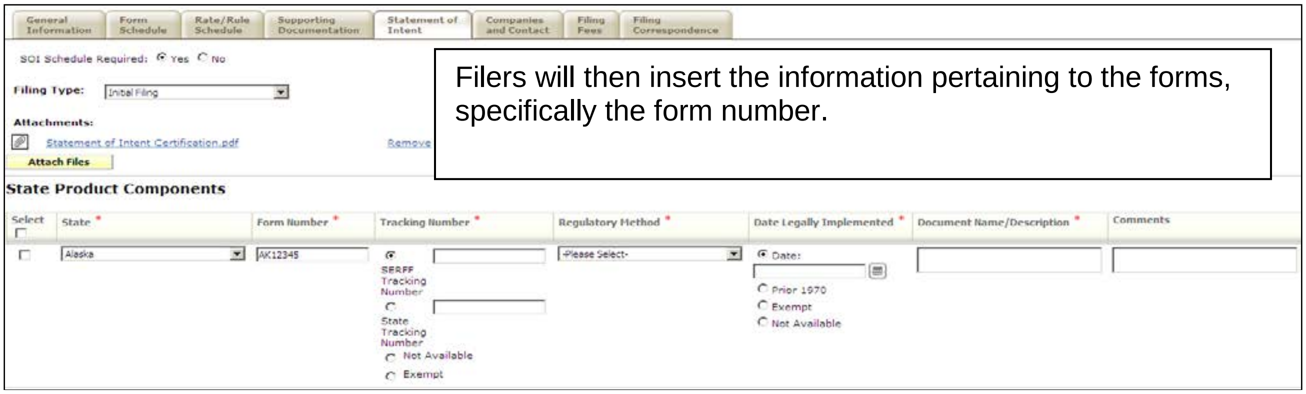
2. The IIPRC has added a special tab called the “Statement of Intent (SOI) Schedule”. It is used to facilitate the filing of the required information regarding the so-called “mix &

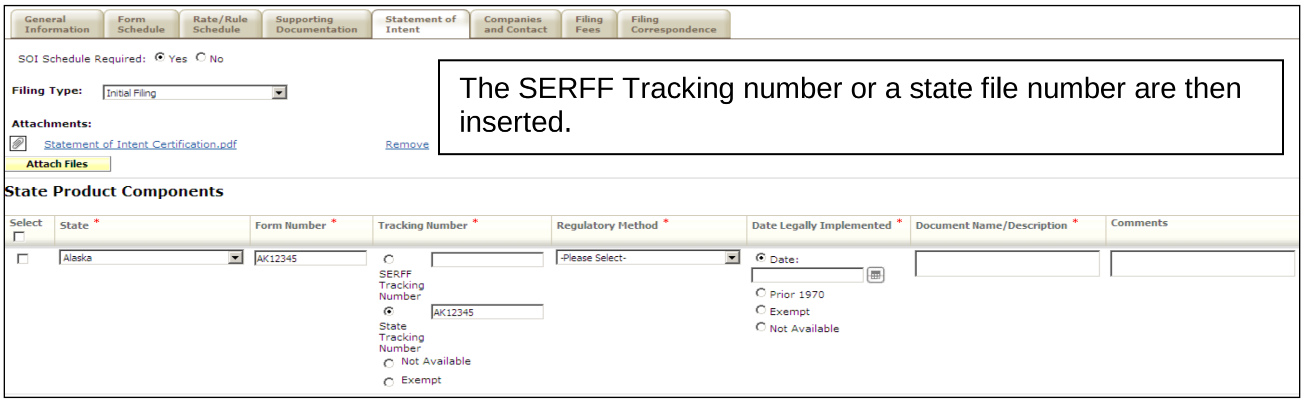
match process" and for the Certification for Non-IIPRC Forms. Please read the requirements set forth in the IIPRC SERFF General Instructions and Filing Rules very carefully. Additional information may be found under the Filing Information Notices (FIN) on the web site and in the on-line tutorial, provided on the Industry Resources page, entitled "How to Submit a Statement of Intent (SOI) in SERFF". Please reference the Statement of Intent Template Instructions if you will be using the *Preformatted SOI Excel Spreadsheet* located on the Insurance Company Resources page to complete the SOI Schedule.

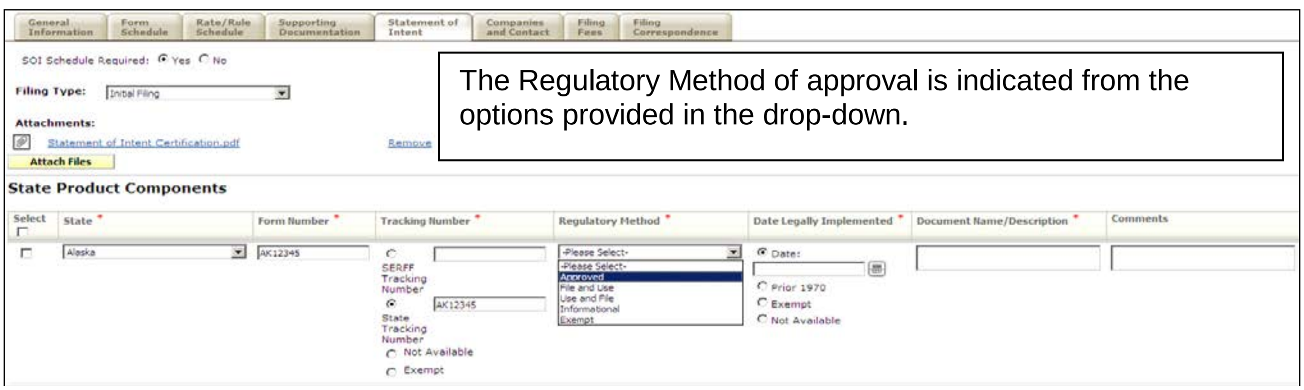


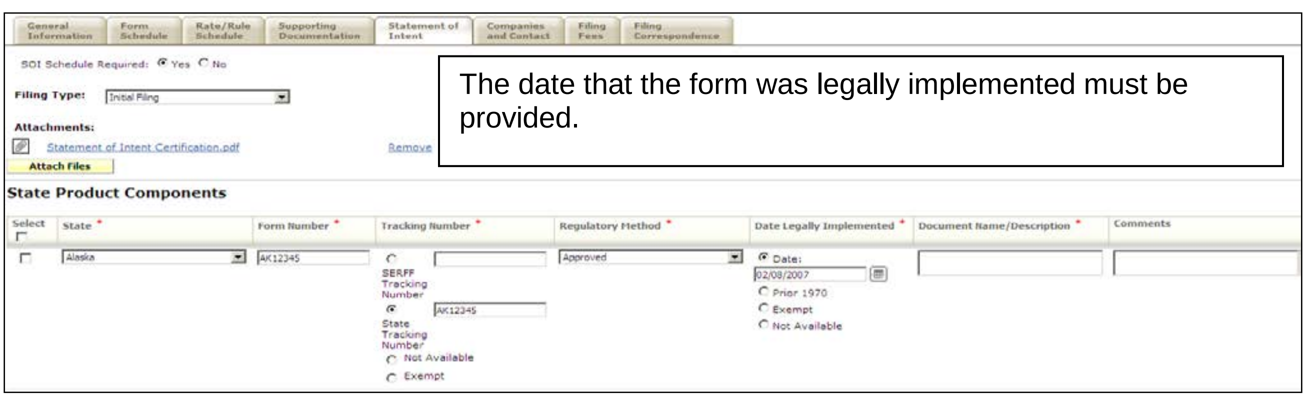


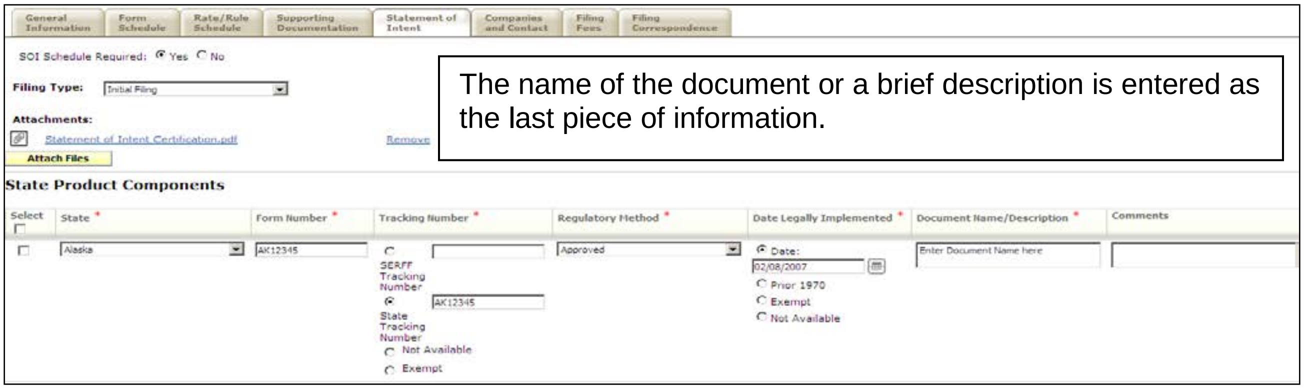


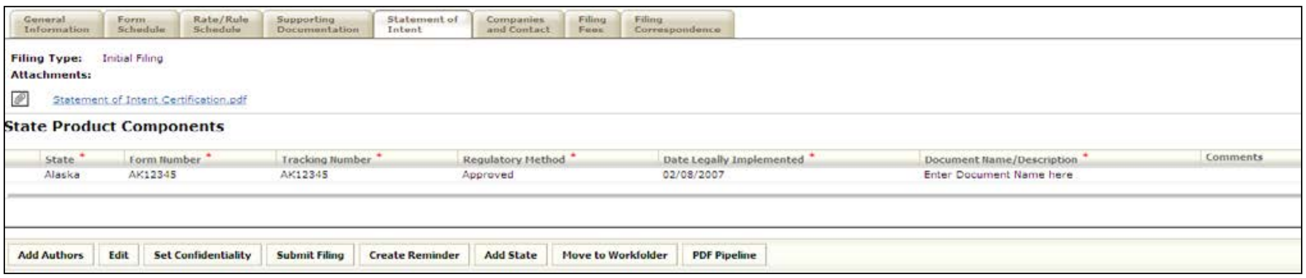

Filers will then insert the information pertaining to the forms, specifically the form number.


The SERFF Tracking number or a state file number are then inserted.

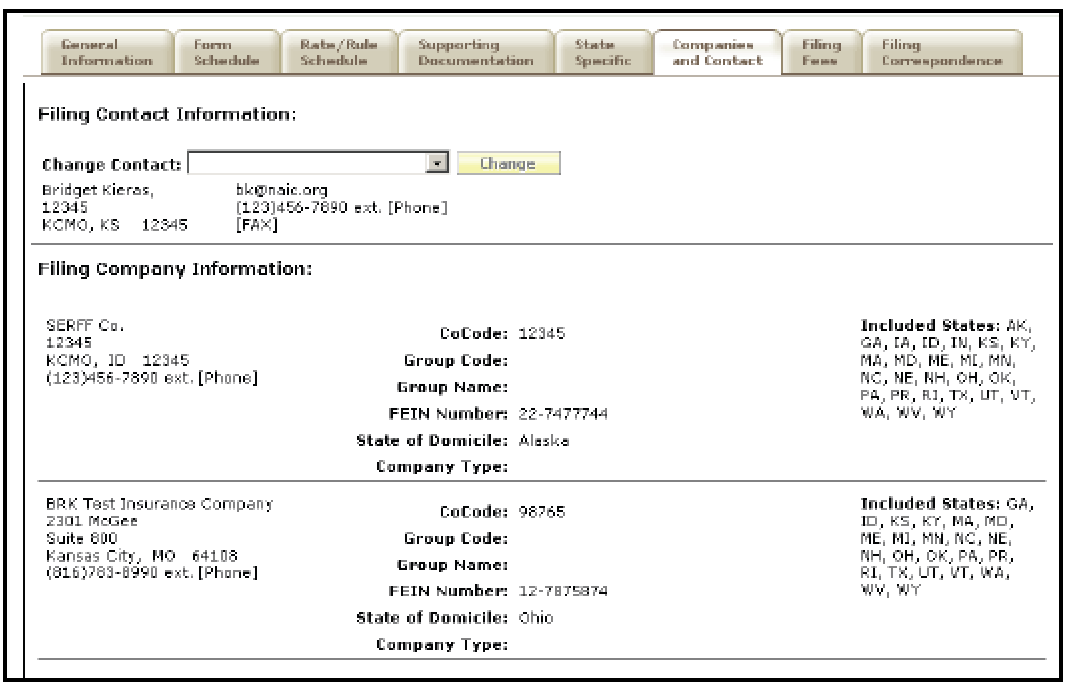

The Regulatory Method of approval is indicated from the options provided in the drop-down.


The date that the form was legally implemented must be provided.

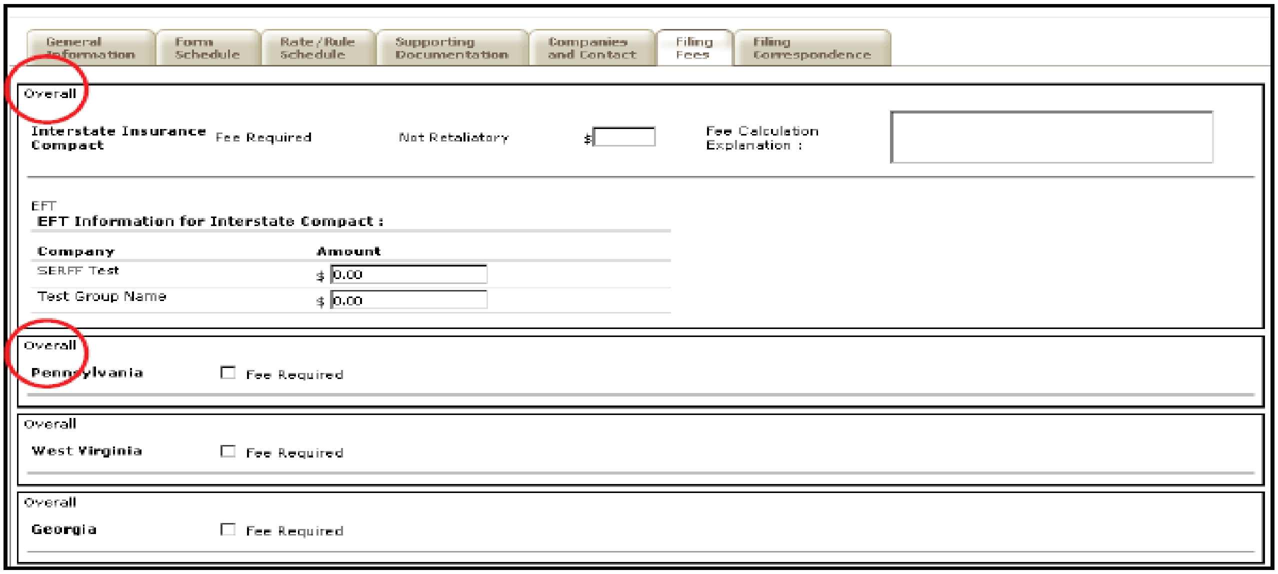




3. The Companies and Contact tab - There are two differences on the Company/Contact tab with regard to the IIPRC filing.
    - First, companies cannot be added as they can on a single state filing. The company information set in the Filing Wizard cannot be changed.
    - Second, each company has a list of associated states. Once approved, the individual states viewing the filing will only see the companies to which they are matched.



4. The Filing Fees tab – Filing to the IIPRC requires the use of EFT. The information on this tab must be completed before the filing can be submitted. There are two sections for the IIPRC and for each state that may require a fee. The “Overall” information includes: an indication of whether a fee is required; whether the basis of the fee is retaliatory; the amount of the fee required; and a text description to explain how the fee was calculated. Please note that “overall” does not mean the total amount of the fees associated with the product filing; just for that particular field – either the state or the IIPRC filing fee.



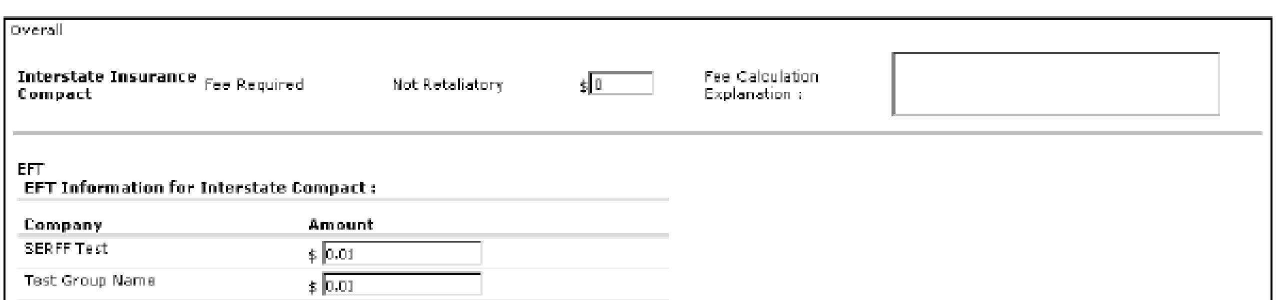
The EFT information controls the EFT transactions and the amount paid to the IIPRC and the states.

Compact Per Product Filing Fee

The IIPRC collects a Compact Per Product Filing Fee. The amount that is due is based on two factors – (1) whether the filing submission requires an actuarial review and (2) the premium volume as reported in Schedule T Part 2 of the Annual Report filed with the NAIC. More specific information may be found on the Insurance Company Resources page, specifically the Schedule of Fees. The Per Filing Fee is required per product per company as defined in the Interstate Insurance Product Regulation (IIPRC) Terms and Procedures for IIPRC Filing Fees excerpted below.

- A product is a policy or contract, including any application endorsement, or related form which is attached to and made part of the policy or contract for an individual or group annuity, life insurance, disability income or long term care insurance product that an Insurer is authorized to issue as detailed in the Compact Model Statute.

- A product is also a Product component filed under the “Mix and Match” submission process detailed in §110 of the Operating Procedure for the Filing and Approval of Product Filings.



☐To complete the information for each state:

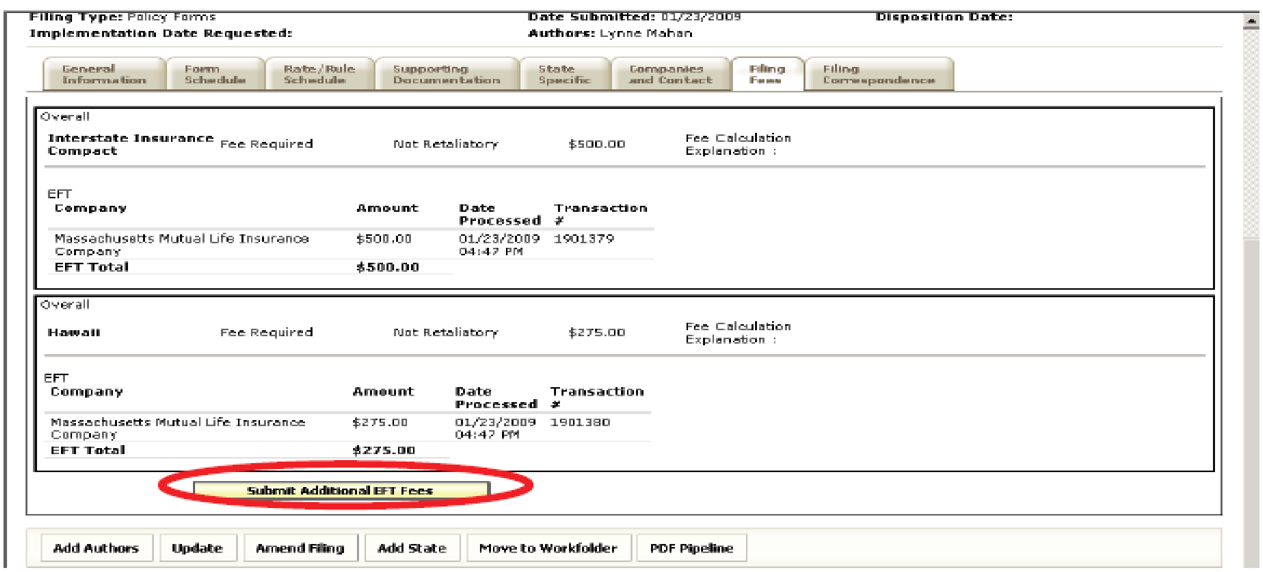
- For each state where a fee is required, check the box next to “Fee Required”. This will expand the Fee Information area for that state.

- Complete the Overall Fee section as it would be if the filing were being made directly to that state.

- Note that all state fees for a Compact filing must be paid at the time of filing, including fees for Texas (who normally bills in arrears). You will not be billed by Texas for IIPRC product filing submissions after the filing has been received.

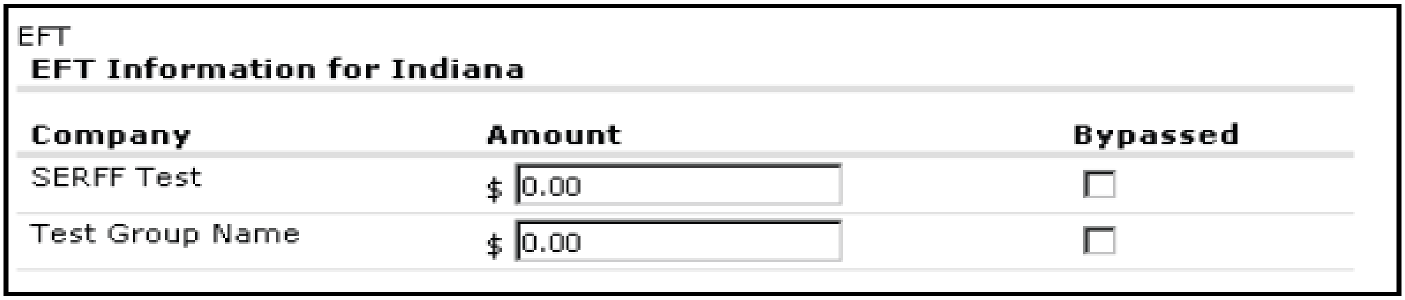
- Additional fees due to the states as determined after filing will need to be remitted before your filing receives a final disposition in SERFF.

- To add additional fees, please click on “Submit Additional EFT Fees” and then select the proper state from the drop-down menu.

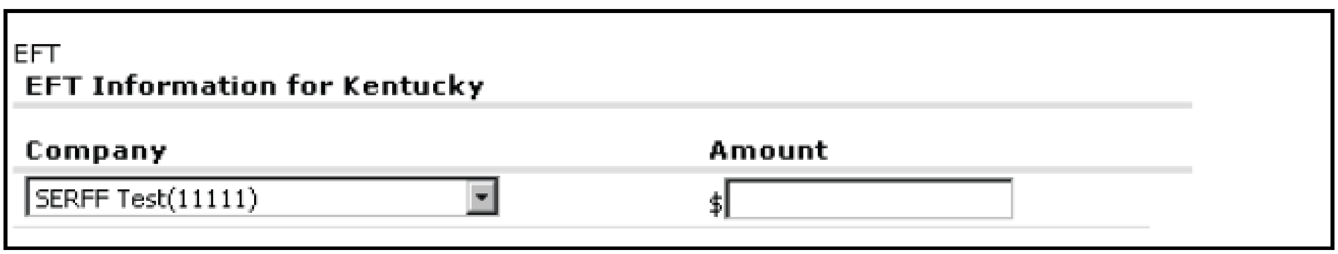


- Additional information regarding individual state filing fees is located on the on the Industry Resources page of the IIPRC’s web site: http://www.insurancecompact.org/industry_resources.htm.

- o Complete the EFT information for the state, remitting the fees the state would normally require for this filing. Depending on the state set up, fees may be remitted in one of two ways:
    1. Per company: Yes – A fee must be remitted for each company listed on that filing. Enter an amount next to each company. If a fee is not owed for a listed company, check the Bypassed box for that company.



    2. Per company: No – One fee must be remitted equal to all fees due for the entire filing. Select a company from the list and enter the appropriate amount.



Once the Fees have been paid, the filing is ready to be submitted. Click “Submit Filing” in order to complete the filing submission and send to the IIPRC for review and approval.