

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

#	Regulator or IP	DESCRIPTION OF SUGGESTED TOOL CHANGE	REASON OR JUSTIFICATION FOR SUGGESTED CHANGE	SERFF Comments	Group Discussion
1	Regulator	Addition of the following or similar language to the group life TOI definitions (L02G, L04G, L05G, L06G, L07G, L09G): "...regardless of whether the group policyholder, the insured, or both pay the premium."	We are hoping the addition of this clarifying language will reduce the number of products submitted under Group Life Other (L08G), as we think the specific group life TOIs and Sub-TOIs should apply regardless of whether or to what extent the insured pays the premium.	Would the clarifying language negatively impact other states?	Add the suggested language to the applicable descriptions.
2	Regulator	Addition of new Sub-TOIs to the Group Term Life TOI (L04G) in order to avoid submission of products under the Group Life Term Other Sub-TOI	Filers have been submitting the majority of group term life products under the Group Life Term Other Sub-TOI (L04G.500) with regular frequency and for no discernible reason. We think that the addition of more specific Sub-TOIs, or perhaps the clarifying of existing ones, will reduce opportunities for confusion.	Would a better option be to update the description on L08 Other TOI to state if a TOI exists for a product, the product should be filed under that specific TOI?	Update description of L04G.500 Other to: This TOI should only be used if the product is not identified under any other TOI/Sub-TOI combinations listed within L04G.
3	Regulator	Eliminating the TOIs for Life - Special (L03G and L03I)	The purpose of these TOIs is not clear, to us or to Filers. We have received 22 filings total under these TOIs since inception of SERFF; 7 of those were withdrawn or rejected, and most of the remaining we would now receive under Life Other (L08G and L08I) or Flexible Premium Adjustable Life (L09G or L09I).	SERFF has had 1149 filings with these TOIs. Would an update to the description provide clarification?	Keep the TOIs active. To eliminate improper use, states can opt to turn off submissions for the TOIs.

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

4	Regulator	Restoring the TOIs for Universal Life (L05G and L05I) with their Sub-TOIs (and eliminating the TOIs for Flexible Premium Adjustable Life (L09G and L09I) with their Sub-TOIs)	Not all universal life products are flexible premium adjustable, which is currently the only specific option the Matrix allows (L09G and L09I) without submitting products through Life Other (L08G and L08I), Life Special (L03G and L03I), or other inappropriate locations. We consider this change to the Matrix an artificial and confusing redirection of the market and request that it be undone.	L05G Group Life - Universal L05G.001 Last Survivor L05G.002 Fixed Premium L05G.003 Flexible Premium L05G.004 Single Premium L05I Individual Life - Universal same Sub-TOIs as L05G	L09 will not be eliminated. L05 will not be reinstated as it will cause confusion for where to file universal life products as they have been filed for the past 13 years. L09 description will be updated to state. Universal life products should be placed under the best matching Sub-TOI.
5	Regulator	In the Health section of the Product Coding Matrix, we suggest adding the following sub-TOI under H11 Group Disability Income as noted below: H11G.006 State Mandated Plan A State-mandated policy requiring employers to provide disability benefits coverage to its employees for an off-the-job disabling injury or illness.	For years, our state has mandated that employers provide the above coverage and we review the forms before issuance but have been unable to distinguish them in the SERFF system from the usual Disability Income products. We would like to be able to readily identify these filings so they can be assigned to the appropriate reviewer, tracked, and retrieved. We believe at least five other jurisdictions also have mandatory disability coverage.	How are these product being filed today?	State will add a TOI for electronic submission since so few states have this type of submission.

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

6	Regulator	<p>In the Health section of the Product Coding Matrix, we suggest adding the following sub-TOI under H11 Group Disability Income as noted below:</p> <p>H11G.007 Paid Family Leave A policy designed for employers to provide its employees a portion of partial income replacement during a leave to help with family pressures such as bond with a new child or care for a family member with a serious health condition.</p>	<p>New York's recent enactment of Paid Family Leave legislation results in our need to identify filings for this new product so they may be appropriately assigned, tracked and retrieved. We believe at least 5 other jurisdictions have versions of this coverage.</p>	<p>FMLA is short term so how would these product differ from Sub-TOI H11H.002 Short Term?</p>	<p>State will add a TOI for electronic submission since so few states have this type of submission.</p>
7	Regulator	<p>We request a new TOI or sub-TOI to support products described as 'Similar Supplemental Coverage' under 45 CFR 146.145(c)(5)(i)©</p>	<p>Currently, there is no specific TOI for the above referenced products. We have seen several of these filed and have been using the TOI H24: Limited Wraparound Coverage to facilitate data collection. This is an imperfect solution and has created confusion for both filers and staff.</p>	<p>Add another Sub-TOI or provide further clarification within the description?</p>	<p>H25G Group Health - Similar Supplemental Coverage H25G.001 Any Size Group H25G.002 Large Goup Only H25G.003 Small Group Only Description Coverage designed/intended to comply with federal regulations regarding similar supplemental coverage such as 45 CFR 146.145(b)(5)(i)(C), or as permitted by the state.</p>

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

8	Regulator	<p>Add a Sub-TOI under MS08 for Innovative Individual Medicare Supplement - Standard Plans 2010</p>	<p>Annually, NAIC generates a 'Survey' report for New and Innovative Benefits for Medicare Supplement plans, to maintain a record of state-approved Medicare Supplement "New or Innovative Benefits," for use by regulators and others in the industry and/or interested parties (based on NAIC Medicare Supplement Model Regulation - Model #651.</p> <p>In order to capture the SERFF filings that fall within these Innovative benefits, a Sub-TOI designed for this benefit product would assist for an easy way to retrieve annually, to fulfill the completion of this survey report.</p>	<p>Add another Sub-TOI, provide further clarification within the description or use State-TOI?</p>	<p>Sub-TOI will not provide the granularity necessary for other reporting. Will use key term search or state filing description to find innovative products.</p>
9	Regulator	<p>Add a line to the description of MLO1.000</p> <p>An insurance certificate issued on an existing insurance contract indicating that another insurer has assumed all of the risk under the contract from the ceding insurance company. For example, companies assuming both life and health lines, individual and/or group.</p>	<p>To provide an example to the existing description; to be more descriptive.</p>	<p>If a more descriptive description is desired should be provide even more of a description to let filers know if they are filing only one product, they should file under the life or health TOIs?</p>	

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

10	Regulator	<p>Replace the description of ML02.000</p> <p>Not specifically described above. Combination life and health products.</p>	To provide an example to the existing description; to be more descriptive.	Would updating to this description limit the authority of this Sub-TOI?
11	Regulator	<p>Add a TOI for NA02: NA02 Annual Network Adequacy Report with an Adequate Network</p>	To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.	
11a	Regulator	<p>NA02.000 Preferred Provider Benefit Plan (PPBP)</p> <p>A life/health insurer that offers a Preferred Provider Benefit Plan (PPBP) is required to file an Annual Network Adequacy Report FIN543 with TDI on or before April 1 of each year and prior to marketing any plan in a new service area.</p>	To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.	
11b	Regulator	<p>NA02.001 Exclusive Provider Benefit Plan (EPBP)</p> <p>A life/health insurer that offers an Exclusive Provider Benefit Plan (EPBP) is required to file an Annual Network Adequacy Report FIN543 with TDI on or before April 1 of each year and prior to marketing any plan in a new service area.</p>	To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.	

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

11c	Regulator	<p>NA02.002 Preferred Provider Benefit Plan Vision (PPBP)</p> <p>A life/health insurer that offers a Preferred Provider Benefit Plan (PPBP) Vision product is required to file an Annual Network Adequacy Report FIN543 with TDI on or before April 1 of each year and prior to marketing any plan in a new service area.</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	
12	Regulator	<p>Add a TOI for NA03: NA03 Annual Network Adequacy Report without an Adequate Network requiring an Access Plan</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	
12a	Regulator	<p>NA03.000 Preferred Provider Benefit Plan (PPBP)</p> <p>A life/health insurer that offers a Preferred Provider Benefit Plan (PPBP) is required to file an access plan if the network is not adequate at the time the Annual Network Adequacy Report FIN543 is submitted.</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

12b	Regulator	<p>NA03.001 Exclusive Provider Benefit Plan (EPBP)</p> <p>A life/health insurer that offers an Exclusive Provider Benefit Plan (EPBP) is required to file an access plan if the network is not adequate at the time the Annual Network Adequacy Report FIN543 is submitted.</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	
12c	Regulator	<p>NA03.002 Preferred Provider Benefit Plan Vision (PPBP)</p> <p>A life/health insurer that offers a Preferred Provider Benefit Plan (PPBP) Vision product is required to file an access plan if the network is not adequate at the time the Annual Network Adequacy Report FIN543 is submitted.</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	
13	Regulator	<p>Add a TOI for NA04: NA04 Annual Network Adequacy Report with an Adequate Network</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	
13a	Regulator	<p>NA04.000 Health Maintenance Organization (HMO)</p> <p>An HMO is required to file an Annual Network Adequacy Report with TDI on or before October 1 of each year and prior to marketing any plan in a new service area.</p>	<p>To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.</p>	

Life, Accident/Health, Annuity, Credit Product Coding Matrix Suggestions

13b	Regulator	NA04.001 Health Maintenance Organization (HMO) An HMO is required to file an access plan if the network is not adequate at the time the Annual Network Adequacy Report is submitted.	To be a tool used to track the companies Annual Network Adequacy Reports for adequate networks vs. the companies that have to include an access plan with the annual filing.	
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Uniform Transmittal Document Suggestion

Suggestion #	Regulator or IP	DESCRIPTION OF SUGGESTED TOOL CHANGE	REASON OR JUSTIFICATION FOR SUGGESTED CHANGE	SERFF Comments
1	Regulator	Add the SERFF Tracking Number of Last Filing in the Rating Information on the Rate/Rule Schedule	Filers are required to add the overall percentage and effective date of last revision, it would be helpful if they also supplied the SERFF Tracking Number for research purposes.	Would the addition of the last rate filing be useful in the rating information?

General Information
Form Schedule
Rate/Rule Schedule

Filing Method:

Rate Change Type:

Overall Percentage of Last Rate Revision:

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

Tracking Number of Last Filing