

# PROPOSED COMPACT STRATEGIC PLANNING FRAMEWORK DISCUSSION DRAFT

Item	Draft Priority	Draft Objectives	Draft Goals
1.	Uniform Standards States Accept and Companies Use	Robust – Uniform Standards reflect strong consumer protections	1. Wider and easier participation by all Compacting States in standards development
		Relevant – Uniform Standards reflect product offering available in states	2. Updating or creating Uniform Standards to accommodate emerging products / product features accepted by majority of Compacting
		Reasonable – Uniform Standards reflect balanced product requirements	States
			3. Future standards development of new product lines
			4. Streamline the Five-Year Review process

### **Summary of Comments (Members, Compact Filers, Consumers, Legislators)**

- --Rulemaking process is lengthy but provides opportunities for input and transparency to accommodate the needs of the industry and individual state situations which is a tricky balance of competing needs.
- --Compact works hard to address issues that may result in opt-outs and to generate options to address these concerns. However, to develop standards where no one opts out leads to more unreasonable standards.
- --Adopt "highest standard" to reduce concern from Compacting States about consumer protection and market stability.
- --Would strongly like to see the Compact expand its role in the review of long-term care premium rate increase.
- -- Prefer to file with the Compact but have found that because the Uniform Standards are limiting and do not offer ways to enable innovation, state-by-state filings are necessary.
- --Consider Uniform Standards for marketing materials for Compact-approved products.
- --Consider life Uniform Standards to allow incidental or supplemental benefits to reflect offering in the marketplace today.
- --Consider expanding Compact &/or Uniform Standards for group whole life and universal life; for group accident and sickness products like group accident, group hospital indemnity, group cancer, group critical illness; stand-alone accidental death and dismemberment and short-term disability and Medicare Supplement
- --Adopt meeting structure similar to NAIC method that allows all states to attend committee meeting.
- --Better communication to states not on the Product Standards Committee to be aware of developments in time to participate constructively.
- --Work with states early to identify potential areas of concern based on individual state statutes. Concerns raised by member states not adequately addressed before process moves forward.
- --Compact does a great job of informing states of what's being reviewed and soliciting comments from Compacting States.
- --Compact should be nimble in implementing or changing Uniform Standards to react to the changing markets and product designs or correct oversight or omission in Uniform Standards.
- --Improve 5-year review process allowing more input and in-depth discussion with the companies regarding complicated issues as lack of knowledge or expertise from regulators about certain products hampers progress at times.
- $-- Compact should consider a \ more \ open \ and \ transparent \ process \ for \ the \ development \ of \ the \ Uniform \ Standards, \ especially for \ consumers, \ non-profits \ and \ academics.$



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2.	Nationally Recognized Regulatory	Responsive – Provide prompt review and	1. Proactively provide information to Compacting
	Review Process	turnaround times	States on Compact review process and
			activities
		Reliable – Provide consistent, thorough and quality	
		reviews	2. Enhance internal tools for reviewers to promote
			consistent and speedy product reviews
		Relatable – Provide information and processes	
		working with Compacting States to facilitate their	3. Find ways to address speed-to-market demands
		state market and financial regulatory functions with	and rapid product development
		respect to Compact-approved products	
			4. Find ways to minimize competing paths to
			product approval between states and Compact

#### **Summary of Comments (Member, Compact Filer, Consumers, Legislators)**

- --Compact staff is very receptive and communicative when seeking answers or input on Compact-approved forms.
- --Compact should have more communication with Compacting States on rate and form filing reviews requiring extra review time due to company's non-compliance or resistance to working with Compact.
- -- Compact should have a pilot program to file innovative products with the Compact Office in conjunction with the Compacting States.
- --System where indicator for new product filings with unique or innovative features.
- --Compact should assist states where companies may be gaming the system in choosing whether or not to file a product and its different variations with the Compact, states or both.
- --Compacting States should not be pressured or encouraged to direct insurers to file products with the Compact.
- --Having product requirements that are consistent through the Compact is incredibly helpful.
- --Speed to market has a lot to do with the decision to file with the Compact.
- --The staff at the Compact are very communicative with any of our filing questions, always helpful and polite. They rely solely on the standards and not on "their" opinion as we see with state reviews.
- --Filing insurance product(s) through the Compact is extremely more productive than filing product(s) individually with each state and commend the quick turnaround time on responding to submissions.
- --Compact objections are very clear on what needs to be done.
- --Compact should give more attention to consistency as company has experienced inconsistent reviews in the type, volume and cadence of objections based on the assigned reviewer.
- --Compact should facilitate how to deal with forms still required to be filed individually to Compacting States for a Compact-approved product (i.e. disclosures, advertising, etc.) and should work with Compacting States to provide guidance to filers.



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3.	Resource for Compacting States, Regulated Entities and Consumers	Responsible – Provide excellent and accountable information and services	Develop better reporting information to Compacting States
		Respected – Retain qualified and experienced staff	2. Develop type and process for training and orientation programs
		Ready – Provide proactive information on Compact activities and be an accessible source of information	3. Make improvements to website and notices to make Compact processes easier to follow
			4. Maintain sustainable and resilient financial and legal aspects of organization

### **Summary of Comments (Member, Compact Filer, Consumers, Legislators)**

- --Improve website so it is easier for regulators and public to follow developing Uniform Standards.
- --Compact should have a process where the states can discuss issues that may be affecting a single company.
- --Compact should explore ways to communicate early with Compacting States on areas that may be key concern for all or individual Compacting States.
- -- A formal, education process for member Commissioners and regulators how the Compact works would be helpful given knowledge of Compact may get lost when staff turnover.
- --Need to expand educational resources for members.
- --Compact should adopt process for communication of market trends, consumer complaints and insurer activities.
- --Improve notification process for non-committee members in order to increase awareness of scheduled meetings and opportunity to submit questions and comments.
- --Compact staff are very knowledgeable, helpful and responsive to industry filers so that it is easy to understand requirements and processes which helps in submitting filings as efficiently and 'cleanly' as possible.
- --Compact's participation in industry meetings and training sessions are incredibly helpful.
- --Compact provides useful information for filers on the website. Compact webinars are helpful, and the pre-filing communication tool facilitates prompt response.
- --Continue outreach to the filing community to offer training and continually improving service offerings, i.e., expedited review, filing information notices and guidance.
- --Compact staff is transparent in its dealings with companies, Compacting States and other stakeholders and consistently communicates across all available channels.
- --Compact provides excellent speed to market and maintains state regulatory system for enforcement and consumer protection.