



## Step-by-Step Instructions for Statement of Intent (SOI) Completion

### Overview

These instructions detail the submission of the Statement of Intent (SOI) Schedule within an Insurance Compact product filing that contains Mix and Match elements through SERFF. 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.

Within the Insurance Compact filing submission there is a unique schedule called the "SOI Schedule". It is used to facilitate the filing of the required information regarding the state approved product components to be used with the Compact approved forms under the Mix and Match process per §111 of the [Operating Procedure for the Filing and Approval of Product Filings](#) (Product Filing Rule). Along with the information to be included on the SOI Schedule pertaining to the state-approved components is a certification signed by a Company Officer. This [certification](#) may be found on the [Insurer Resources](#) page of the Insurance Compact website. The certification provides a certification that the combination of a Commission Product Component and a State Product Component does not contain inconsistent, ambiguous, unfair, inequitable or misleading clauses, or exceptions or conditions that unreasonably affect the risk purported to be assumed. Please read the requirements set forth in the Product Filing Rule, §111, very carefully.

Additional information may be found under the Filing Information Notices (FIN) on the Insurance Compact website and in the on-line tutorial, provided on the [Insurer Resources](#) page, entitled "How to Submit a Statement of Intent (SOI) in SERFF".

### Background

Mix and Match was developed to accommodate the initial pace of Uniform Standards development and considerations involved with company's product development cycle. Adopted Uniform Standards on the [Record](#) page of the Compact website provide whether or not Mix and Match is permitted for the particular Uniform Standard. Each company filer is responsible for verifying whether Mix and Match is permissible. All of the individual and group life (other than *Additional Mortality Table Change Standards*, IIPRC-L-08-MTC) and individual annuity Uniform Standards permit Mix and Match. It is not allowed for long-term care (LTC) products filed with the Compact; but LTC riders and applications filed with the Compact may be Mixed and Matched with state- and Compact-approved life and annuity products. Mix and Match is not allowed for individual or group Disability Income (DI) products filed with the Compact. The only exception for DI product filing submissions is that a DI application filed with the Compact can be Mixed and Matched with state-approved DI forms. Mix and Match is allowed for all group life and group policyholder applications, and for group DI riders filed with the Compact for use with state-approved group life or annuity contracts.

As company filers prepare the product for filing, there are a few rules as to the applicability of Mix and Match that should be considered.

- When filed using Mix and Match, the Compact forms cannot alter or change values or nonforfeiture requirements in state-approved forms.
- Company filers cannot use Mix and Match to fully comply with Uniform Standard (e.g. Compact form with the state form meets the requirements set forth within the Uniform Standard).
- Mix and Match cannot be used to bypass provisions within the Uniform Standards.
- Filers cannot Mix and Match the parts of a form (e.g. application parts).

## Completing the SOI Schedule Line by Line

1. The company filer must indicate whether or not the SOI Schedule is required for the filing submission. To do so, the filer will need to select either “Yes” or “No”. If “No” is selected then the completion of the SOI Schedule is not required. If “Yes” is selected, the company filer will need to provide the Certification as well as complete all fields of the SOI Schedule.

2. The filer must select the “Filing Type”. The available options are either “Initial” or “Updated or Supplemental Filing”. “Initial” should be selected for new filings. “Updated” will be selected if a company filer needs to update the SOI to reflect new state-approved product components. The company filer will then attach the Statement of Intent Certification.

3. The company filer will then be required to insert the appropriate number of rows in order to enter the detailed information pertaining to the state-approved product components. There are a few ways to accomplish this:

- a. The filer may select a state by clicking on “Select”. The states that are included in the filing will appear in the drop-down. There, the filer will be able to indicate the number of rows required per each state.

- b. Another option is to select “Add Multiple Rows”.
- c. The third option available is for single-state data submission on the SOI Schedule. This option is best to use if there is only one form that needs to be recorded on the SOI Schedule.

SOI Schedule Required:  Yes  No

Filing Type:

Attachments: [Form A.pdf](#) [Remove](#)  
[Attach Files](#)

Selected State:  [Statement of Intent Help](#) [Turn On Validation Mode](#) [Validation Help](#)

Select	State *	Form Number *	Tracking Number *	Regulatory Method *	Date Legally Implemented *	Document Name/Description *	Comments
<input type="checkbox"/> <a href="#">Copy</a>	Alabama	Form 1	<input checked="" type="radio"/> SERFF Tracking Number <input type="text" value="SERFF-123456789"/> <input type="radio"/> State Tracking Number <input type="text"/> <input type="radio"/> Not Available <input type="radio"/> Exempt	Approved	<input checked="" type="radio"/> Date: <input type="text" value="01/01/2017"/> <input type="radio"/> Prior 1970 <input type="radio"/> Exempt <input type="radio"/> Not Available	<input type="text" value="Document Name"/>	<input type="text" value="Comment"/>

[Delete Selected](#) [Add Single SOI Row](#) [Add Multiple SOI Rows](#) [Import Template](#)

4. The Statement of Intent schedule has six (6) fields that are required to be completed in order to transmit the filing submission successfully. Each field is to be completed for each state included on the SOI Schedule.
  - a. The first field to be completed is the State. Only the states that are included on the filing should be selected from the drop down options. It is also important to note that only the states the company is currently licensed in should be included on the filing. More details about adding a state to the SOI are explained later in this document.
  - b. Filers will then need to provide the form number for the applicable forms. It is important to note that only the forms provided on the SOI should be state forms. There should be no listing of ICC forms on the SOI Schedule. References to the applicable ICC forms to be used with the new forms may be identified in the Cover Letter submitted under the Filing Description and be associated using the Associated Filings feature.
  - c. The next field to be completed is the Tracking Number – either the SERFF Tracking Number of the State Tracking Number. While the option of “Not Available” is available, it should only be used if the information is truly not available to the filer.
  - d. The Regulatory Method in which the state approved components were approved will be selected next. There are options provided in the drop-down menu.
  - e. The date the component was legally implemented is to be provided. The date is to be entered if it is available. If the date of implementation is prior to 1970, that is the option to select. Again, while the option of “Not Available” is available, it should only be used if the information is truly not available to the filer.
  - f. The last field to be completed will be the “Document Name/Description”. Here the company filer will provide a brief description of the form, e.g. Child Term Rider.

- g. For application only filing submissions, the company filer may modify the data that is submitted.
  - i. Each applicable state should be included on the SOI Schedule as detailed in 4(a).
  - ii. For the Form Number, the filer may enter “allindicatedforms”. Please note that for states like Montana and Oregon, a full listing of form numbers should be included.
  - iii. All other fields will be completed as indicated in 4(c – f).
- h. Completed lines in the SOI may be copied to assist with data entry.
  - i. Select “Copy”.
  - ii. Select the appropriate state(s).
  - iii. Update the SERFF Tracking Number.
  - iv. Update the “Date Legally Implemented” if different than the original date of implementation for the copied form data.

## Completing the SOI Schedule Using the Preformatted Excel Spreadsheet

Company filers can also create, save, and modify the [Preformatted SOI Excel Spreadsheet](#), an Excel file (in the format provided by SERFF) that can be automatically uploaded into the Statement of Intent Schedule using the Template functionality (see Using the Template to Automatically Upload to the SOI Schedule below). The Excel file is located on the Insurer Resources page of the Insurance Compact website.

A few items of note when using the Preformatted Template:

- Do not alter the spreadsheet format, or the settings will be invalid.
- Maintain the XLS format and do not save as an XLSX document.
- Do not skip lines between data for the states or within rows.
- Lastly, please use the proper two-character postal abbreviations for the states.

Company filers will provide the same information in the Preformatted SOI Excel Spreadsheet as they would if they were to complete the SOI Schedule manually.

Once the data has been completely entered into the Preformatted SOI Excel Spreadsheet, the filer will need to upload the document into the SERFF filing.

1. The company filer will upload the preformatted spreadsheet in the same manner as all other templates. Click the “Template” tab.
2. Click on “Create Schedule Template”.
3. Select the Business Type of “Life, Accident/Health, Annuity, Credit”. The Schedule Type will also need to be selected; the correct one is “Statement of Intent”.
4. Click “Next” to be prompted to enter the Schedule Template Name.
5. The company filer may then enter the data required for the SOI Schedule in a few ways.
  - a. The filer may select “Add Single Row” should only a single SOI Schedule item is required. The company filer will then select the applicable state and enter the required data.
  - b. “Add Multiple SOI Rows” may be selected to add multiple items to the SOI Schedule at the same time. The data is entered and then the states that the data is applicable to are selected. Please note that the SERFF Tracking Number and the Date Legally Implemented will need to be manually updated for each state.
  - c. The company filer may add data to the SOI Schedule by way of the preformatted excel spreadsheet. To upload the information from the Preformatted SOI Excel Spreadsheet, the filer will select “Add SOI Rows From Excel File”.

It is important to note a few things about uploading a template.

- i. When uploading, do not leave the Template until each SOI line item has been created and saved.
- ii. More than one Preformatted SOI Excel Spreadsheet may be uploaded into the SOI, but only one at a time.
- iii. The Preformatted SOI Excel Spreadsheet may be imported into any IC filing even if it contains a state not included in the filing. Only the information pertaining to the included states will be imported.
- iv. Upon successful upload of data, a notice will be generated indicating the data has been successfully imported.

## Adding a State to the SOI

Occasionally companies will need to add states to filings. If the filing already uses Mix and Match, the Insurance Compact Office will assume it will also use Mix and Match for the new state and will ask the company filer to clarify before acknowledging the addition of the state. The question about whether the new state will use Mix and Match may be preempted by submitting a Note to Reviewer stating that Mix and Match will not be used for the new state. The new state will not be acknowledged by the Insurance Compact on a Mix and Match filing submission until (1) the SOI is updated for the new state, as described below, or (2) the filing is documented that Mix and Match will not be used for the new state.

**For a filing that already uses Mix and Match, entries can be added to the SOI Schedule.** To update the SOI to reflect the new state, the filer must submit a Note to Reviewer requesting that a filing be re-opened so that the SOI may be updated to add Product Components for the new state(s). The Compact Office will not acknowledge the added Compacting State until the SOI updates are completed. The Compact Office receives a SERFF message when SOI entries are added; it is not necessary to notify the Compact Office via phone, email or Note to Reviewer that the SOI has been updated.

- In order to update the SOI:
  - The filer must create an Amendment which is located under the Filing Correspondence tab.
  - Proceed in adding all relevant information pertaining to the state(s) to the SOI.
  - Please note that the Amendment must be submitted in order for the updates to be properly transmitted in the filing submission.

**If a pending or approved filing does not already use Mix and Match, the SOI Schedule can be completed.** If the filing does not already utilize Mix and Match, but there will be Mix and Match for the new state(s), when adding the new state(s) to the filing the filer should submit a Note to Reviewer requesting that the filing be re-opened to populate the SOI for the new state(s) and follow the directions for completing the SOI.

- In order to update the SOI:
  - The filer must create an Amendment which is located under the Filing Correspondence tab.
  - Proceed in adding all relevant information pertaining to the state(s) to the SOI.
  - Please note that the Amendment must be submitted in order for the updates to be properly transmitted in the filing submission.

**If the filing already uses Mix and Match but there will be no Mix and Match for the new state(s),** the filer should submit a Note to Reviewer stating that the SOI does not need to be updated.

## Removing Forms from the SOI

Occasionally companies will be asked to withdraw forms for the SOI Schedule due to objections from the Compact Team or a request from a state. Please note that SOI entries should not be removed if products or forms on the SOI have subsequently been approved by the Compact. If Mix and Match shown on the

SOI Schedule has been discontinued, the original SOI entries should remain in place to reflect the combinations of state- and Compact-approved forms that may be in force. The change in product components can instead be documented in a Note to Reviewer as described in the next section.

The Statement of Intent operates like other schedule tabs in a SERFF filing, in that lines containing removed entries remain visible. Lines entered on the Statement of Intent cannot be deleted. As a result, the following instructions result in a *new* line being created to replace the line intended to be removed. Please follow these steps:

1. To update the SOI, click “Change Schedule Items” and navigate to the SOI tab.
2. Select the state(s) that you wish to change under the dropdown menu, “Selected State.”
3. Click “Revise” to change the text in ALL fields:
  - a. The filer should enter the Form Number as “N/A”.

When multiple items are being removed, each form number entered must be unique. Therefore, the approved form numbers should be substituted with slightly different identifiers. *Example: The filer should enter the first Form Number as “N/A” and the second Form Number as “N/A1.”*

- b. Tracking Number: Enter “Not Available” or the SERFF Tracking Number to avoid a validation error based on the SERFF Tracking Number.

To clarify, the use of “N/A” in the Tracking Number field – either SERFF or State Tracking Number – should be avoided, as it will result in an error message because the application is looking for a valid tracking number. There are a few things that may be done in order to avoid this error. The first is to include the SERFF Tracking Number as it was submitted (if the SERFF Tracking Number was entered in the field). The second is to change the Tracking Number selection to “Not Available” rather than “N/A” in either the SERFF or State Tracking Number field.

SERFF Tracking Number

State Tracking Number

Not Available

Exempt

- c. Date Legally Implemented: Re-enter the date that was originally entered.
    - d. Regulatory Method: Re-enter the method that was originally selected. As a reminder, the options are “Approved,” “File,” and “Use, Use and File, Informational, or Exempt.”
    - e. Document Name/Description: Enter “N/A.”
    - f. Comments: Enter “To make previous entry not applicable.”
4. Once the changes have been saved, go to “Filing Correspondence,” click on “Create Amendment.” Enter Comments, click on “Add Schedule Item(s),” select applicable draft items, click “Add Item(s),” click “Save,” then click “Submit.”

## **What To Do If SOI Forms Are No Longer Used**

If there are state approved forms that are no longer being used with the approved Compact forms and the company would like to note as such in the filing submission, then a Note to Reviewer may be submitted rather than revising the SOI Schedule. In this Note to Reviewer, please indicate which forms will no longer be used with the Compact-approved forms.

If a new filing has been made, the Associated Filings feature will tie the submissions together. In the cover letter of the new submission, the company should identify if the new forms will replace any other forms.