



# INSURANCE DIVISION

## MEMORANDUM

Date: August 24, 2012

To: Karen Schutter  
IIPRC Executive Director

From: Rhonda Saunders-Ricks  
Manager, Rates and Forms  
Oregon Insurance Division

Subject: Group Term Life Insurance Policy and Certificate Standards for Employer Groups

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Oregon recommends revision to Section 4, Policy and Certificate Provisions, U. Prohibited Exclusions. All other Interstate Insurance Product Regulation Commission (IIPRC) insurance policy and certificate standards contain a list of allowed exclusions rather than listing prohibited exclusions. By listing the prohibited exclusions, it appears that any exclusion not listed may be allowed. This also raises the question as to whether IIPRC would have discretion in evaluating whether exclusions not listed are permissible, or if all exclusions not specifically prohibited are considered acceptable.