

DATE: July 16, 2012
TO: IIPRC Management Committee
FROM: Industry Advisory Committee
SUBJECT: Group Term Life Policy/Certificate Standards Dated June 19 2012

We are submitting the following comments:

§2. GENERAL FORM REQUIREMENTS

A. POLICY AND CERTIFICATE STRUCTURE
Page 4, Item (3)

At the end of the first sentence, the language should read “policy or *certificate*.”

B. CERTIFICATES
Page 4, Item (8)

The word “how” should be deleted.

§3. POLICY AND CERTIFICATE PROVISIONS

M. FILING A CLAIM
Page 17, Item (iii)

In May, we suggested adding a new sub- item (iii):

“(iii) Alternatively, the *Covered Person* may complete an on-line claim form if such capability is made available by the insurance company.”

Previous sub-item (iii) becomes new sub-item (iv).

This change was not made, and we seek confirmation that if a company has such feasibility, that if such language is submitted it would be eligible for review and approval since the electronic process would be beneficial to consumers with access to a computer.

O. INCONTESTABILITY

Page 18, Item (1)(a)(iii)

Page 19, Item (1)(b)(iii)

Item (a)

In the situations where a REINSTATEMENT provision will not be included, the words “or the date of last reinstatement” need to be variable so they may be deleted. To allow the variability, we suggest that the words be changed to say “or the date of last reinstatement, ***if applicable.***”

Item (1)(b)

In the situations where a REINSTATEMENT provision will not be included, the words “or reinstatement of insurance” and “after the increase, benefit or reinstatement has been in force” need to be variable so that the first set of words may be deleted in their entirety and in the second set of words “or reinstatement” may be deleted. To allow the variability, we suggest:

- that the first set of words be changed to say “or reinstatement of insurance, ***if applicable.***”
- That the second set of words be changed to say “after the increase, benefit or reinstatement, as applicable, has been in force....”.

We seek confirmation that companies will be allowed to file these words as variable.

W. SUICIDE

Page 24, Item (1)(a)

The semi-colon belongs after the quotation mark.

§5. POLICY AND CERTIFICATE BENEFITS

C. CONVERSION

Page 2, Item (1)(c)

Need to correct formatting.

Submitted by:

IIPRC Industry Advisory Committee:

Bill Anderson, NAIFA

Lee Covington, IRI

Tom English, New York Life

Mary Keim, State Farm Insurance Company

Miriam Krol, ACLI

Amanda Matthiesen, AHIP

Jill Morgan, Symetra

Marie Roche, John Hancock