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Subject: Group Whole Life: MassMutual Comments
Date: Monday, June 5, 2023 10:51:18 AM
Attachments: [image003.png](#)

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Good Morning –

Below are MassMutual’s comments for the Group Whole Life standards. Please accept my apologies for our late submission.

Comments:

1. **Accelerated DB:**

- a. point A.(3) talks about ‘single qualifying event’. We don’t think this works for Chronic Illness Accelerated Death Benefits where the Covered Person might have to periodically recertify the claim eligibility. We suggest removing the word ‘single’. The definition of the Qualifying event later in the document is fine.
- b. Some of the requirements in section H. Qualifying Events do not seem consistent with the products we’re seeing in the current marketplace. Additional exclusions should be considered for Chronic Illness ADBs (certain pre-existing conditions, intentional self-inflicted injury, etc.).
- c. Section I.(1)(e) – the benefits do not end if the policy ends. The coverage is portable. The wording that the coverage ends ‘at the earliest of’ is not accurate. I suggest replacing with ‘...shall end due to one or several of the following reasons:’.

2. **Combined Enrollment:**

- a. Employee and Dependent should be replaced with Insured. We offer coverage to grandchildren (Juvenile Life products) who are not dependents.

Thank you,
Eric

Eric Weinstein

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