Adjunct Services Committee Regulator-Only Call September 23, 2024 Call Summary

The Adjunct Services Committee met to finalize their draft framework and pre-filing questionnaire for conducting a pilot program for purposes of public exposure. The framework was updated based on the previous ASC regulator call to focus on the key steps for reviewing a product in this process. While there is recognition this process could lead to a referral for a new or amended Uniform Standard, referral should not always be the result but, rather, case-by-case basis depending on the nature of the product or feature.

The Adjunct Services Committee reviewed the updated pre-filing questionnaire with suggested comments from Maryland and feedback during the Compact workshop at the Insurance Summit. The changes were intended to elicit more detail about the company, product description and consumer benefits.

The Adjunct Services Committee agreed the next step was to solicit public feedback on the proposed framework and pre-filing questionnaire. The purpose of the feedback will be to refine a recommendation to the Management Committee to pilot a collaborative program to review products within the Compact product lines that are outside the Uniform Standards and may be considered "new" or "innovative." The ASC will have public call on October 15th to receive comments or suggestions aimed at ensuring the process protects consumers, preserves state authority on whether or not to accept or allow the product or benefit feature in their state, and offers efficiencies for filing companies.

The Compact Office provided an update on its September 13th call for rate and form regulators in Compacting States to discuss filing activities. The Compact Office reported on its review of individual long-term care (iLTC) in-force rate increase requests and annual and triennial iLTC rate certification on Compact-approved iLTC products. The Compact gave an update on the current status of submissions and approvals for products under the new index-linked variable annuity standard. It also reported on pre-filing communications and filing submissions that encountered scope or compliance issues. The Compact Office shared responses to questions from states and also provided information on filings where the filing company was filing forms with the Compact and state at the same time using the mix-and-match process. Several regulators commented that the information shared was valuable as it helped answer questions as well as made it easier to understand the issue or their state filing.

The Adjunct Services Committee received an update on the Insurance Summit Compact where regulators engaged in tabletop exercises to walk through the proposed framework and pre-filing questionnaire. The Committee agreed the tabletop exercise of using practical examples of possible innovative product scenarios is a good way to refine this process. The Compact Roundtable will be an opportunity to gain feedback from stakeholders including industry representatives, company filers, state legislators, and consumer representatives.

The next call of the Adjunct Services Committee will be a public call on Tuesday, October 15th.