



IIPRC-L-07-G-PolChange

UNIFORM STANDARDS FOR RIDERS, ENDORSEMENTS OR AMENDMENTS USED TO EFFECT GROUP WHOLE LIFE INSURANCE POLICY CHANGES CHECKLIST

Effective Date: February 10, 2025

Scope: These standards apply to riders, endorsements or amendments that are used to effect group policy changes that are required by state or federal law, that have been requested for a group whole life insurance policy by the policyholder, or that are the result of either party exercising their rights under the group policy. Such policy change forms may be attached to the group whole life insurance policy on the policy date of issue or after the policy date of issue.

With respect to non-employer groups, approval of a group policy and certificate by the Commission shall not be deemed as approval to use or issue the product to a non-employer group. A non-employer group must be approved or permitted by the Compacting State as required under the applicable state laws and procedures before a product filing approved by the Commission pursuant to the applicable group Uniform Standards may be issued to a non-employer group.

Mix and Match: These standards are available to be used in combination with State Product Components as described in Section 111(b) of the Operating Procedure for the Filing and Approval of Product Filings. These standards are available to be used in combination with IIPRC-approved or state-approved group life insurance and annuity forms.

Self-Certification: These standards are not available to be filed using the Rule for the Self-Certification of Product Components Filed with the Interstate Insurance Product Regulation Commission.

§ 1. ADDITIONAL SUBMISSION REQUIREMENTS

A. GENERAL

The following additional filing submission requirements shall apply:

YES NA

		(1) Include all forms filed for approval with the filing. Highlight changes to a previously approved form.
		(2) If the filing is being submitted on behalf of an insurance company, include a letter or other document authorizing the firm to file on behalf of the insurance company.
		(3) If the form contains variable items, include the Statement of Variability. The submission shall also include a certification that any change or modification to a variable item shall be administered in accordance with the requirements in the Variability of Information section, including any requirements for prior approval of a change or modification.
		(4) Include a certification signed by an insurance company officer that the form has a minimum Flesch Score of 50. See Appendix A of the respective group life insurance product standards with which the form will be used for the Flesch methodology.
		(5) Include a listing by filing jurisdiction of the types of policies with which the form will be used, including the policy form numbers, the corresponding approval date for these policies and any filing identification number.
		(6) Include a statement whether the form will be made a part of the group policy at issue or is intended for use after the date of issue of a group policy, or both.

B. VARIABILITY OF INFORMATION

YES NA

		(1) The insurance company may file a generic group policy change form to accommodate all the policy changes required to reflect the underwriting needs of an insurance company. To support the use of such form, the submission shall include a Statement of Variability providing information sufficient to identify the potential policy changes that may be made.
		(2) The insurance company shall identify items that will be considered variable. The item shall be bracketed or otherwise marked to denote variability. The submission shall include a Statement of Variability that will discuss the conditions under which each variable item may change.
		(3) The group policy changes to be made shall be consistent with the Statement of Variability filed for such policy change form and the Statement of Variability filed for the group whole life insurance policy for which the change is being made, as well as the company’s underwriting guidelines for such policy.
		(4) Items such as officer titles and officer signatures may be denoted as variable and may be changed without notice or prior approval.

C. READABILITY REQUIREMENTS

YES NA

		(1) The text of the statement of insurability change form shall achieve a minimum score of 50 on the Flesch reading ease test or an equivalent score on any other approved comparable reading test. See Appendix A for Flesch methodology. This requirement shall not apply to statement of insurability change forms or a section of statement of insurability change forms that are subject to federal jurisdiction.
		(2) The text of the statement of insurability change form shall be presented in not less than ten point type, one point leaded.
		(3) The style, arrangement and overall appearance of the statement of insurability change form shall give no undue prominence to any portion of the text or section of the form.

D. FAIRNESS

YES NA

		(1) The statement of insurability change form shall not contain inconsistent, ambiguous, unfair, inequitable or misleading clauses, provisions that are against public policy as determined by the Interstate Insurance Product Regulation Commission, nor shall it contain exceptions and conditions that unreasonably affect the risk purported to be assumed in the general coverage of the group policy forms with which the statement of insurability change form will be used.
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§ 2. BENEFIT PROVISIONS

A. GROUP POLICY CHANGE FORM REQUIREMENTS

YES NA

		(1) The full corporate name of the insurance company shall appear on the form.
		(2) At least one signature of an insurance company officer shall appear on the form.
		(3) The form shall contain a statement that it is made a part of the group policy, and that the form provisions apply in lieu of any policy provisions to the contrary.
		(4) A form identification number shall appear at the bottom of the form in the left hand corner. The form number shall be adequate to distinguish the form from all others used by the company. The form number shall include a prefix of ICCxx (where xx represents the year the form was submitted for filing).
		(5) The form shall include:
		(a) The group policy number;
		(b) The name of the policyholder for whom the change applies;
		(c) Any changes to the premium;

		(d) The effective date of the group policy change; and
		(e) If the group policy change has an expiry date, the expiry date for the policy change.
		(6) If the group policy change eliminates or reduces benefits or rights under the policy, the form shall require the signature of the policyholder. An insurance company may eliminate the signature requirement only if allowed by state law if the change is required by state or federal law or if it has supporting documentation, such as an application signed by the policyholder or a signed request from the policyholder, supporting the policy change.

The Reviewer Checklist is intended for the sole purpose of assisting a company product filer ("User") in understanding the requirements of the applicable Uniform Standard(s) for IIPRC product filings. Users are hereby notified not to rely solely upon the Reviewer Checklist in preparing a product filing or in complying with the IIPRC Uniform Standards, Rules and Operating Procedures. The User also acknowledges there is a possibility of human, mechanical or technical error in the development, presentation or use of the Reviewer Checklist. The Interstate Insurance Product Regulation Commission (Commission) accepts no liability for any loss, cost or damage caused by use of this tool, including without limitation, direct or indirect, incidental, special, consequential or exemplary or punitive damages arising out of the use or inability to use the Reviewer Checklist. There are no warranties either express or implied and User specifically acknowledges the Commission does not warrant the truth, accuracy or completeness of the Reviewer Checklist.

Appendix A

Flesch Methodology

The following measuring method shall be used in determining the Flesch score:

- (1) For policy forms containing 10,000 words or less of text, the entire form shall be analyzed. For policy forms containing more than 10,000 words, the readability of two, 200-word samples per page may be analyzed instead of the entire form. The sample shall be separated by at least 20 printed lines.
- (2) The number of words and sentences in the text shall be counted and the total number of words divided by the total number of sentences. The figure obtained shall be multiplied by a factor of 1.015.
- (3) The total number of syllables shall be counted and divided by the total number of words. The figure obtained shall be multiplied by a factor of 84.6.
- (4) The sum of the figures computed under (2) and (3) subtracted from 206.835 equals the Flesch reading ease score for the policy form.
- (5) For purposes of (2), (3), and (4), the following procedures shall be used:
 - (a) A contraction, hyphenated word, or numbers and letters, when separated by spaces, shall be counted as one word;
 - (b) A unit of words ending with a period, semicolon, or colon, but excluding headings and captions, shall be counted as a sentence; and
 - (c) A syllable means a unit of spoken language consisting of one or more letters of a word as divided by an accepted dictionary. Where the dictionary shows two or more equally acceptable pronunciations of a word, the pronunciation containing fewer syllables may be used.
- (6) The term “text” as used in this section shall include all printed matter except the following:
 - (a) The name and address of the insurance company; the name, number or title of the group policy; and;
 - (b) Any language which is drafted to conform to the requirements of any federal law or regulation; any policy language required by any collectively bargained agreement; any medical terminology; any words which are defined in the statement of insurability; and any language required by law or regulation; provided, however, the insurance company identifies the language or terminology excepted by the paragraph and certifies, in writing, that the language or terminology is entitled to be excepted by this paragraph.

Date: October 24, 2024

Group Whole Life Riders, Endorsements or Amendments to Effect Policy Changes Checklist

- (7) At the option of the insurance company, statements of insurability may be scored as separate forms or as part of the group policy with which they may be used.