

Requests For Uniform Standards Development 2025
Including Carry Over from 2024
Adopted 11-16-2025

Product Line	Uniform Standard Request	Requesting Party	Description of Request	Reason / Explanation	New or Amend	Recommended Priority
Individual Life	CARRYOVER REQUEST: Registered Indexed-Linked Variable Life and Adjustable Variable Life	ACLI, several companies and Compacting States	New uniform standard for index-linked life products. These products are similar to their counterparts on the annuities side. Compact develop new uniform standards or amend the existing “Additional Standards for Index-Linked Crediting Benefit Features for Individual Adjustable Life Policies,” to provide for registered index-linked individual universal life products.	Companies have been asking to file these products, but the current Uniform Standards restrict products to unit-linked. Registered indexed-linked products are becoming more prominent in the life insurance and annuity markets. These products have been approved in a majority of states, with Oregon being the exception. Compact standards would help companies provide uniform administration while enhancing speed-to-market.	New	MEDIUM PSC has questions as there is no actuarial standard or guideline. The PSC is considering creating a subgroup to discuss further.

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Individual Life	CARRYOVER REQUEST: Standards for Accidental Death Benefits and Additional Standards for Accidental Death and Dismemberment Benefits	Compact Office	The Compact Office requests the Commission amend these Uniform Standards to explicitly address the ratio of accidental death benefit (and/or accidental death and dismemberment) amount to the all-cause death benefit. A provision addressing the appropriate ratio could be added to the Benefits section of these respective Uniform Standards and provide explicit guidance for the	This amendment will provide more transparency to members and filers as to the explicit requirement for the ratio of individual accidental death benefits and accidental death and dismemberment benefits to individual all-cause death benefit.	Amend	HIGH. Effort should be minimal and easy to incorporate in PSC workload.

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			Compact Office and company filers.			
Individual Life	CARRYOVER REQUEST: Standalone Individual Accidental Death Benefit Standard	Compact Office	In consultation with the Compact Officers, the Compact Office requests the Commission develop a new uniform standard for standalone accidental death benefit.	During the Compact Roundtables, industry representatives as well as some Compacting States requested these Uniform Standards to cover products that are issued separately from an all-cause life insurance or disability income policy.	New	VERY HIGH: This work can be based on Models and the current Uniform Standards so may not take a significant effort. States have the option to opt out if they do not wish to participate in the stand-alone product.
Individual Life	CARRYOVER REQUEST: Individual Flexible Premium Adjustable Life Insurance Policy Standards and Individual Flexible Adjustable	Compact Office	Amendments to provide guidance on several actuarial issues.	The Compact Office recommends guidance and clarifications to these Flexible Premium Adjustable Standard to address questions and concerns that have arisen during the actuarial review of these products.	Amend	HIGH: Please note at the request of the Compact Office, the PSC is moving this item to HIGH. These are clarification

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	Variable Life Insurance Policy Standards					amendments to provide more detail in the Standards for actuarial requirements. These may be able to start at the AWG while the PSC does other standards work.
Individual Life	NEW REQUEST: Bonus Benefits for Individual Adjustable Life	Compact Office	Develop a new standard for review of bonus benefits associated with individual adjustable life insurance policies. The individual annuity bonus standards can be used as a starting point in drafting these new standards.	In order to be consistent in review approach of these similar benefits across product lines, a new standard similar to the existing bonus standard available on the individual annuity product is recommended for development.	New	HIGH – There is a counterpart on the annuity side to reference so effort should be minimal.

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Individual Annuity	NEW REQUEST: Income Payment Benefit feature standard for Variable Annuities	ACLI	We request that the Compact develop new uniform standards for protected income solutions.	Protected income solutions (PIS) are an important benefit design that does not fit into the language in the proposed Additional Standards for Guaranteed Living Benefits (GLBs) for Individual Deferred Variable Annuities or Individual Deferred Index Linked Variable Annuity Contracts. As with GLB benefits, PIS provides longevity protection by continuing lifetime income payments even after the account value is exhausted. PIS allows the income payments to increase, decrease, or stay the same based upon the index performance of the index strategies chosen, subject to the levels of downside protection included in those index strategies. The design allows contract holders to choose the levels of downside protection and growth potential that aligns to their risk tolerance, while offering the flexibility to adjust as their needs change throughout retirement, including the ability to lock in a minimum income amount by electing index strategies with full downside protection. No minimum floor on protection is required beyond that. The adoption of new PIS standards will facilitate filings of ILVAs through the Compact. They are already well established in the ILVA market since 2018, as well as in other markets.	New	VERY HIGH – During the amendment process for the annuity benefit feature standards for ILVAs, the PSC agreed a separate standard for this feature would be needed.

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Individual Annuity	NEW REQUEST: Additional Standards of Waiver of Surrender Charge Benefit	Compact Office	Expand the categories of what is considered a qualifying event under Section 3(3) of the Additional Standards of Waiver of Surrender Charge Benefit.	The Compact has received waiver benefits for qualifying events that are not specifically identified under the uniform standards as qualifying events. As they are not identified as a qualifying event under the standard, the Compact has not been able to review the benefits. When there is no charge associated with the benefit, it is truly a consumer benefit to have a way to withdraw money from an annuity without being assessed charges. Expanding the qualifying events identified in the standard would allow companies to offer these consumer benefits that could be filed and reviewed through the Compact.	Amend	HIGH
Individual Annuity	CARRYOVER REQUEST: Individual Deferred Paid-Up Non-Variable Annuity Contract	ACLI	We request that the Compact amend the existing standards for individual deferred paid-up non-variable annuities (commonly marketed as “deferred income annuities” and	Add the par/non-par distinction to the actuarial certification to address inconsistency between the actuarial certification required in Section 1.B.1.(g) and the statement in Section 3.B.(1)(c)(i) that “annuitants of annuity contracts that are not expected to pay dividends shall be considered a separate class from annuitants of annuity contracts that are expected to pay dividends”. To be meaningful, the division of annuitants into par and non-par classes should apply to both the initial premium requirements (Section 1.B.(1)(g)) and the additional premium requirements (Section 3.B.(1)).	Amend	MEDIUM: Longevity annuities are not a frequent type of filing, and par or non-par affects only mutuals. This effort should be minimal.

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			“longevity annuities”) to allow the division of annuitants into par and non-par classes to apply to both the initial premium requirements of Section 1.B.(1)(g) and the additional premium requirements of Section 3.B.(1)(c)(i).			
Individual Annuity	NEW REQUEST: Uniform Standard for contingent deferred annuities	ACLI	We request that the Compact develop new uniform standards for contingent deferred annuities.	Contingent deferred annuities (CDAs) provide customers flexibility to keep their assets in managed accounts with their trusted financial professionals or retirement plans and provide longevity protection at the same time. Those individuals with assets in these vehicles are currently unprotected from longevity risk and subject to additional risks (inflation, sequence of returns) as they enter the decumulation phase of retirement. This product wraps certain investments in these vehicles and pays out a	New	LOW: The PSC has concluded this product is not yet conducive for Uniform Standards. It is not a product that states commonly receive, and

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				lifetime income stream once the account value is depleted. The market would benefit from the clarity and consistency the Interstate Compact would bring to the CDA market. This would provide a structure for states to adopt these standards using the latest Model 805 requirements (which include CDA requirements) without requiring individual states to take additional regulatory or legislative action and to implement the 2015 guidance from the CDA Working Group.		there is concern that lack of commonality among the states in terms of requirements would cost significant time in development.
Individual Annuity	NEW REQUEST: Consider Changes to the ILVA standards	ACLI Compact Office	ACLI: Amendments to the Right to Examine Compact Office: Additional requests arising out of product reviews	The Management Committee considered the request of the ACLI to consider an amendment to the Right to Examine section and agreed to add it to the list for 2025. The Management Committee agreed to allow consideration of other changes that may arise during the year.	New	MEDIUM TO HIGH
Individual Disability Income	CARRYOVER REQUEST: Standalone Individual Accidental Death and Dismemberment Benefit Standard	Compact Office	In consultation with the Compact Officers, the Compact Office requests the Commission develop a new	During the Compact Roundtables, industry representatives as well as some Compacting States requested these Uniform Standards to cover products that are issued separately from an all-cause life insurance or disability income policy.	New	VERY HIGH: This work can be based on Models and the current Uniform Standards so may not take a significant

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			uniform standard for standalone accidental death and dismemberment benefit.			effort. States have the option to opt out if they do not wish to participate in the stand-alone product.
Group Disability Income	NEW REQUEST: Paid Family Leave (PFL) benefit for disability income	ACLI	We request that the Compact develop new uniform standards for paid family leave (PFL) insurance products, including riders.	Following the adoption of NCOIL's Paid Family Leave (PFL) Insurance Model, there has been increased state activity to adopt or recognize PFL as a new line of insurance in which any insurer licensed to transact life insurance or disability income insurance may also provide coverage for PFL. Similarly, many carriers are looking to provide this new coverage through either a standalone product or as a rider but cannot do so under current Uniform Standards. Several Compacting States already allow for PFL coverage. We would recommend that the development of PFL standards be fashioned after the NCOIL Model.	New	MEDIUM: The PSC suggests surveying the states on their laws before proceeding to standards development.
All product lines	CARRYOVER REQUEST: New uniform standard for Value-Added Services	Compact Office ACLI	Compact Office: In consultation with the Compact Officers, and discussed during	During the Compact Roundtables, industry representatives raised the desire to file more specific value-added services benefits with the Compact to be used with their products. Having specific Uniform Standards for value-added benefits—both those that do affect policy values	New	IN PROGRESS / VERY HIGH The PSC is conducting a survey of the

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			<p>Compact Roundtables, the Compact Office requests the Commission develop Uniform Standards for requirements for non-insurance benefits, commonly referred to as value-added services to be added to an individual life insurance policy by rider, endorsement or amendment or by incorporation into a policy form. Additional Standards for All Benefit Features while recognizing the benefits are not</p>	<p>like a credit or premium discount, and those that do not affect policy values—could reduce mix and match and the filing of basic life or annuity products with the states.</p> <p>ACLI: As the number of insurance policies being sold with VAS increases, there is an increasing need for the development of a set of uniform standards for VAS. The NAIC's Uniform Unfair Trade Practices Act was recently amended to explicitly allow for VAS to be offered without being disclosed in the policy, provided they fall into one of several enumerated buckets and also adherence to several other requirements.</p>		<p>states on their laws and types of value-added services allowed before making a recommendation to and getting guidance from the Management Committee to commence drafting a Uniform Standard.</p>

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			<p>insurance and are subject to unfair trade practices in states.</p> <p>ACLI: We request that the Compact develop new uniform standards for value-added services (VAS), preferably as a stand-alone standard that could be applied to any product, including life insurance, disability income insurance and group insurance.</p>			
All product lines	CARRYOVER REQUEST New uniform standard for	ACLI	We request that the Compact develop new uniform standards for	As the number of insurance policies being sold with ancillary and incidental benefits increases, along with the number of states that are allowing them to be filed, there is an increasing need for	New	HIGH: PSC suggests a survey of the states on their laws and types

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	ancillary/incidental benefits		ancillary/incidental benefits. These benefits do not include HIPAA-excepted supplemental benefits such as specified disease, hospital indemnity, accident-only, dental, vision and Medicare supplement	the development of a set of uniform standards for ancillary and incidental benefits.		of benefits allowed and getting guidance from the Mgmt. Committee.
Group Life	CARRYOVER REQUEST: Additional Standards for Graded Death Benefit Group Term Life	New York Life, ACLI, Corebridge Financial	New product standards for graded death benefit features for Group Term Life.	Most groups want guaranteed issue products with graded benefit features in their offerings.	Amend	IN PROGRESS / VERY HIGH: This Standard is currently under review by the PSC.
Group Life	NEW REQUEST: Amend waiver of premium for group term life standards	ACLI	We request that the Compact expand the scope of the "Group Term Life Insurance Uniform	It is important, for both substance and consistency, that the "Group Term Life Insurance Uniform Standards for Waiver of Premium While the Employee is Total Disabled" and the "Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events for Whole Life Insurance	Amend	VERY HIGH – Can use group whole life waiver of premium with qualifying events as a

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			Standards for Waiver of Premium While the Employee is Total Disabled" to include qualifying events so it is aligned with the "Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events for Whole Life Insurance Policies and Certificates for Employer Groups."	Policies and Certificates for Employer Groups" be aligned with regard to qualifying events. In the latter standards, "Qualifying event" means any of the following, as long as the event meets the requirements of the standard: (1) Diagnosis of limited life expectancy or life-threatening condition (2) Diagnosis of cognitive impairment (3) Assessment by qualified professional establishing inability to perform certain activities of daily living (4) Receipt of care from a health care facility (5) Disability other than total disability (6) Unemployment.		model so effort should be minimal.
Group Life	NEW REQUEST: New uniform standards for	ACLI	We request that the Compact develop new	The adoption of these new standards would promote uniformity across all Compact member jurisdictions and provide consistency in the sales	New	MEDIUM – The PSC views this as a

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	group private placement / variable universal (VUL) products		uniform standards for group private placement/variable universal life (VUL) products.	and administration of group private placement/variable universal life (VUL) policies. It would also allow for improved speed-to-market since companies would only have to work with one entity (the Compact) in order to obtain approval in all of the Compact member jurisdictions, as opposed to having to work with each of those jurisdictions separately. In addition, new standards would greatly streamline the carriers' filing and forms maintenance process as it eliminates the need for special state versions.		specialized product and is open to comments on whether this is a common product issued to employer groups or non-employer groups.
Group Life	NEW REQUEST: Standalone accidental death products	ACLI	We request that the Compact develop new uniform standards for group accidental death and dismemberment (AD&D) products.	The Compact does not currently have uniform product standards for group accidental death products, forcing companies to file with the states individually. Furthermore, some companies have had to file several versions of this product over time, which increases the amount of time and effort that has to be expended by both insurers and the states. The individual state filings also increase the complexity of administration due to variations among the different jurisdictions.	New	MEDIUM: The PSC suggests surveying the states on their laws.

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Group Annuity	NEW REQUEST: Group annuity product line	ACLI	We request that the Compact (1) expand the scope of all remaining group product standards to allow for eligible non-employer groups.	It is important, for both substance and consistency, that the scope of the remaining group product standards be expanded to allow for eligible non-employer groups. In some cases, this could be done with a simple amendment to allow for changes in terminology based on whether the group is a non-employer group.	Amend	VERY HIGH: Effort should be minimal.
Group Annuity	NEW REQUEST: Group annuity product line	ACLI	We request that the Compact recommend that the states include portability trusts as an eligible non-employer group.	In addition, we ask that the Compact recommend that the states include portability trusts as an eligible non-employer group. A portability trust provides a means to allow individuals who are insured under a traditional group life policy to retain coverage after they would otherwise lose coverage due to termination of their employment or discontinuance of the underlying group policy. The means through which the portability option is offered is via a group policy issued to a trust (i.e., a portability trust). The trust is the policyholder (for the portability option only, the underlying group policy is/was issued to the person's [now former] employer). Portability provides a great benefit to consumers. Not only can employees who were covered through their employer's group policy retain their coverage when it would otherwise expire due to termination of employment or discontinuation of	N/A	REMOVE FROM LIST: This is not a Uniform Standard development issue. Under the recently adopted Operating Procedure for the Use of Compact-Approved Products for Other than Employer Groups, it is within the

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				the underlying coverage, but they also retain their insurance at favorable group rates.		purview of states to consider portability trusts as an eligible other than employer group under their applicable state laws.
Group Annuity	NEW REQUEST Actuarial Memorandum Requirements	Compact Office	Remove the group annuity contract description requirement from the actuarial requirements section of the standard as this requirement is unnecessary and generates objections because most companies are unsure what to include to satisfy	The revision is requested to make reviews more efficient and eliminate objections. Since these filings are exempt from nonforfeiture compliance a certification to that fact should be sufficient to satisfy actuarial requirements under the standard.	Amend	HIGH

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			<p>this requirement. Proposed revised section would read: B.ACTUARIAL MEMORANDUM REQUIREMENTS (1) An actuarial memorandum shall be prepared, dated and signed by a member of the American Academy of Actuaries who certifies the contract is a group annuity exempt from compliance with the NAIC Annuity Nonforfeiture Model 805</p>			

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Group Life and Annuities	NEW REQUEST: Qualified Riders /Endorsements	Compact Office	Develop a new standard for review of tax qualified plan provisions found in group insurance forms. The Compact currently reviews these types of benefits under the group policy or contract standards for tax qualified provisions that are part of the policy/contract only. However, until a new standard is developed that accommodates tax qualified plan provisions as standalone forms for group insurance	In order to accommodate review of certain forms and be consistent in review approach of these types of provisions across product lines, a new standard similar to the existing tax qualified plan provisions standard available on the individual side is recommended for development for group business.	New	VERY HIGH: This new standard will address issues with mix and match. The counterpart standard on the individual side can be used so effort is minimal.

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			<p>business, the Compact is not able to review. The development of this standard would not only allow for review of stand-alone tax qualified forms but also create consistency in review of similar provisions across product lines. The Additional Standards for Forms Used to Provide Tax Qualified Plan Provisions for Individual Annuity Contracts and Additional Standards for Forms Used to Provide Tax</p>			

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			Qualified Plan Provisions for Individual Life Insurance Policies can be used as a starting point in drafting these new standards.			
Group Life and Annuities	NEW REQUEST: Uniform Standards for Riders, Endorsements or Amendments Used to Effect Group Term Life Insurance Policy Changes	Compact Office	Revise Uniform Standards for Riders, Endorsements or Amendments Used to Effect Policy Changes to apply to both group life and annuities.	Expand the Scope of the UNIFORM STANDARDS FOR RIDERS, ENDORSEMENTS OR AMENDMENTS USED TO EFFECT GROUP TERM LIFE INSURANCE POLICY CHANGE to include group annuities or create a new standard for this purpose as riders, amendments and/or endorsements are common forms in group annuity filings as well.	Amend	VERY HIGH: This new standard will address issues with mix and match. The counterpart standard on the individual side can be used so effort is minimal.
Group Disability Income	NEW REQUEST: Standalone accidental death and dismemberment products	ACLI	We request that the Compact develop new uniform standards for group accidental death and	The Compact does not currently have uniform product standards for group accidental death and dismemberment (AD&D) products, forcing companies to file with the states individually. Furthermore, some companies have had to file several versions of this product over time, which increases the amount of time and effort that has	New	MEDIUM: The PSC suggests surveying the states on their laws.

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			dismemberment (AD&D) products.	to be expended by both insurers and the states. The individual state filings also increase the complexity of administration due to variations among the different jurisdictions.		