



Best Practices Checklist

This checklist has been designed as a tool for submitting a cleaner filing. It is not a filing submission requirement. We strongly encourage filers to use this tool as a way to streamline the review process and avoid commonly issued objections.

<u>Yes</u>	<u>N/A</u>	Best Practices
		Was the Scope of the applicable Uniform Standards read thoroughly to ensure that the product may be submitted to the Insurance Compact?
		Were the proper TOI and Filing Type selected? Submission requirements that appear for completion are based on Filing Type and TOI selected by the filer. It is important to select the correct filing type and TOI in constructing your filing. For combination product filings subject to any LTC or DI Uniform Standards, the filing must have a TOI of either LTC or DI.
		Are the proper states selected for the filing submission? Only the states that the company is currently licensed to do business in should be included on the filing submission. All forms in a filing must be approved for all states in a filing. Forms that are intended to be used for specific states must be submitted in separate submissions. States may be added to the filing submission as business licensing changes. States that do not participate in LTC or DI may not be included on combination filings with those features.
		Is there a detailed description of the filing submission on the General Information tab? Use the filing description section of SERFF to describe your product filing. Do not attach cover letters. The Filing Description should contain: a listing of the forms identified by name and purpose; riders, endorsements, amendments, and/or applications filed without a policy should include a statement of the types of policy forms with which the forms filed for approval will be offered; a description of any and all unique features; and identification of the Uniform Standards used to create the product filing submission. If the form(s) in the filing is going to replace a previously approved form(s), please include this information in the Filing Description. Details as to the Associated Filings and which forms in an Associated Filing pertain to the new filing submission should also be included.
		Did you eliminate use of the terms “et al.” and “etc.” in the Filing Description and other free-text fields such as Product Name and Project Name? Forms used with a new filing submission, or to be replaced by a new filing submission, should be identified completely and with specificity. Broad and vague terms like “et al.” and “etc.” in the Filing Description or Product Name fields can lead to questions as to whether the filing company has identified all components submitted for approval or fully described how the product will be used.
		Did you provide an explanation for the use of insert pages? If the filing contains an insert page, an explanation of when the insert page will be used should be included in the filing.

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		<p>Have the related filings been identified using the Associated Filings feature? All related Insurance Compact filings should be tied to the new submission via this filing feature. This will allow the reviewers and the states to understand what forms will be used together. Only filings submitted to the Insurance Compact may be identified as Associated Filings. Submissions under review may be listed as Associated Filings; there is no need to wait until a companion submission is approved to list it as an Associated Filing.</p>
		<p>If there are actuarial components, has an actuary reviewed and addressed all actuarial requirements in the applicable Uniform Standard(s)?</p>
		<p>Is an Actuarial Memorandum required to be included by the applicable Uniform Standards? Only include an Actuarial Memorandum when one is required by the applicable Uniform Standard(s). All actuarial information should be included under the “Actuarial Memorandum” submission requirement found on the Supporting Documentation schedule, unless the filing is a LTC or DI submission. If the filing is a LTC or DI submission, then the actuarial information should be submitted under the Rate/Rule Schedule within the filing submission.</p>
		<p>Is the product sex-distinct or unisex? State whether the policy is sex-distinct or unisex. If sex-distinct, the company shall confirm that the policy will not be issued in any employer-employee plans that are subject to the Norris decision and/or Title VII of the Civil Rights Act of 1964. If Montana is included on any filing submission that includes sex-distinct forms, (1) unisex alternatives to sex-distinct provisions must be included, and (2) the supporting documents section must certify that Montana products will only be issued on a unisex basis. Montana's constitutional equal protection requirement prohibits discrimination solely on the basis of sex or marital status in the issuance of any type of insurance policy, plan, or coverage. Therefore, product submissions that include Montana must be able to be issued on a unisex basis including the mortality basis and tables containing sex-distinct values.</p>
		<p>Is more than one risk class used? If so, include appropriate policy pages completed for each type of rating used by the company as Supporting Documentation; for example, percentage of standard class premium, extra premium, temporary or permanent flat charge per \$1,000 to demonstrate how the policy will disclose the rates and charges applicable to each type of rating class. This is not intended to require pages for all rating classes, but only examples of each type of rating applied by the company.</p>
		<p>Are there uniquely identified specification pages included in the filing submission? If the policy is for use with more than one plan, the submission shall include a separate set of uniquely numbered specification pages for each plan being submitted for approval, along with a separate actuarial memorandum for each plan. The company may not use the same policy form to provide alternate plans by making any features and benefits described in the policy inapplicable by a zero entry or by indicating that the benefit is not applicable on the specifications page or in the policy. For example, the use of one policy with and without a surrender charge is not permitted.</p>

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		Were all the forms submitted on the Form Schedule with their own independent form number and on their own independent line? Do the form numbers entered on the Form Schedule match those shown on the filed forms?
		Was the form submitted in a searchable PDF format with all security settings removed? All forms submitted for approval must be word searchable. PDF documents that are scanned copies of other documents are not searchable. When we are unable to use the compare documents and search features or copy/paste it makes a filing more difficult to review and increases review time.
		Are all applicable attachments for the Submission Requirements filed under the applicable Submission Requirement? File all attachments and supporting documentation relative to a particular submission requirement under that submission requirement. Do not attach as a separate submission requirement. For example, all Statements of Variability and certifications should be included under the "Statement of Variability" Submission Requirement. The Compact does not have a preference between a single SOV document for all forms versus a separate SOV document for each form in a submission.
		Have all submission requirements been "satisfied"? All submission requirements need to be completed even if it may not be applicable to a particular filing. For each item, complete the submission requirement and mark it with a status of "satisfied." If the requirement is not applicable, include an explanation of why it is not applicable and thus satisfied.
		Have the applicable Uniform Standards used for drafting of the filing submission been identified? Specify ALL applicable Uniform Standards that were used in the preparation and submission of the filing. If this information is provided in the filing description, please specify under the Applicable Uniform Standards submission requirement and mark this submission requirement as "satisfied," not "bypassed".
		Were any Disclosures and Illustrations submitted under Supporting Documentation? Disclosures and Illustrations are not required, but if desired for completeness, they should be included under the Supporting Documentation tab and not on the Form Schedule.
		For filings that include an application, did you indicate how the application will be used? Include a statement of how the application will be used, such as paper, electronic, and/or telephonic. For electronic and telephonic uses, (a) describe the procedures that will be used to verify the authenticity of the transaction; and (b) include the additional sections and questions that are required to be completed by an applicant, including additional drop downs, scripts, questions, questionnaires or supplements, if the applicant answers questions in a certain way, such as a "yes" response. Reflexive questions, drop-down questions and scripts may be included as Supporting Documentation.

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		<p>If there were Mix and Match elements to the filing submission, was the Statement of Intent (SOI) schedule completed in its entirety? Only state-approved forms for the states included in the filing submission may be included on the SOI Schedule. The SOI may be updated as forms are approved or states are added to the filing submission. Montana and Oregon require a detailed listing of form numbers on the SOI Schedule.</p>
		<p>Were all the required filing fees submitted for the filing submission? All filing fees – both Compact and state – should be paid at the time of submission via electronic funds transfer (EFT). All fees are due in full per each company included in the filing submission. Detailed information regarding the payment of the filing fees can be found on the Insurer Resources page of the Compact website.</p>