



## **REQUEST FOR COMMENTS ON FRAMEWORK FOR UNIFORM STANDARDS ON GROUP ANNUITIES**

### **I. Background**

The Interstate Insurance Product Regulation Commission (IIPRC) is authorized to establish reasonable Uniform Standards for group annuity products. In accordance with its authority and applicable procedures, the Commission seeks comments from its Members, Legislative Committee, Consumer Advisory Committee, Industry Advisory Committee, interested regulators, filers, interested parties and the public about the framework, scope and definitions that should be used in the development of group annuity Uniform Standards.

**Statutory References:** Articles II (11) and (15) and IV (2) of the *Interstate Insurance Product Regulation Compact* as adopted by Compacting States.

**Operating Procedure References:** Section 103 of the *Rule for Adoption, Amendment and Repeal of Rules for the Interstate Insurance Product Regulation Commission*.

### **II. Request for Comments**

Commenters are invited to submit views and proposed language on any or all of the following topics:

- 1) The variety of Uniform Standards needed for group annuity products and the interaction between multiple standards (if any). For example,
  - a. Should the standards have a “core” with additional standards for specific benefit features (as with the Individual Annuity standards) or should sections of the standards address specific benefit features (as with the Specialized Products/Marketing section of the Individual Adjustable Life standards)?
  - b. Treatment of policy vs. certificate form requirements?
  - c. Should there be separate standards for allocated and unallocated products? Deferred, immediate and longevity? Fixed and variable? Separate and general accounts?
  - d. What types of benefit features should be addressed? Market value adjustments, index-linked investment options, Guaranteed Living Benefit options or others?
- 2) The scope of each of the Uniform Standards suggested in items 1) above.

- 3) Definitions for use in the Uniform Standards.
- 4) Key provisions for the Uniform Standards. This request is focused on the framework for group annuity standards. The Commission intends to provide opportunity in later stages of the advance rulemaking process for comments about specific provisions of the Uniform Standards; however, comments on key provisions in general are welcome at this stage as well.
- 5) Actuarial submission requirements. As with key provisions for the Uniform Standards, the Commission intends to provide opportunity in later stages of the advance rulemaking process for comments about specific Actuarial Submission requirements; however, comments on actuarial submission requirements in general are welcome at this stage as well.
- 6) General submission requirements, such as readability scores, statements of variability, various certifications from officers. As with key provisions and actuarial submission requirements for the Uniform Standards, the Commission intends to provide opportunity in later stages of the advance rulemaking process for comments about specific general submission requirements; however, comments on general submission requirements are welcome at this stage as well.
- 7) The IIPRC process for review of products, or components thereof, under the group annuity Uniform Standards, including the extent of use of the IIPRC's Rule for Self-Certification of Product Components Filed with the IIPRC. Commenters should provide information on the current state-by-state filing process across the Compacting States including how product submission, regulatory review and implementation processes are impacted based on the type of state review process for group annuities (ranging from prior approval to exemption) and the advantages and disadvantages to each type of state review process.
- 8) Any other pertinent information or issues, including specific federal or state legislative, administrative or regulatory references, regarding product design and product content requirements as well as current product filing regulations, processes and requirements for group annuities products that may assist the Commission as it considers the framework, scope and definitions that should be used in the development of group annuity Uniform Standards.

### **III. How to Submit Comments**

#### **Comment Due Date: August 15, 2012. Early submissions are encouraged.**

Interested persons may submit comments by electronic mail to the Interstate Insurance Product Regulation Commission at [comments@insurancecompact.org](mailto:comments@insurancecompact.org). Comments may also be mailed to the Interstate Insurance Product Regulation Commission, 444 North Capitol Street, Suite 701, Washington DC 20001. Comments will be posted to the IIPRC Rulemaking Docket as received.

#### **FOR FURTHER INFORMATION CONTACT:**

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