June 27, 2014

Commissioner Roger A. Sevigny, Chair
Interstate Insurance Product Regulation Commission
444 North Capitol Street, NW
Hall of the States, Suite 700
Washington, DC 20001-1509

Dear Chair Sevigny:

I have been made aware that the Compact will be unable to respond to Florida’s counter offer to the Compact by the July 1, 2014 effective date of our legislation. And, I appreciate the approach that has been outlined for resolving this matter and look forward to the outcome of your meeting on August 15, 2014.

However, as I indicated in my letter, the Florida Legislature expressed its intention, subject to certain additional terms and conditions, to become a compacting state and a member of the Interstate Insurance Product Regulation Commission (Commission), effective July 1, 2014. These terms and conditions included specific public records protections; an opt-out of various Compact standards, including long-term care in its entirety and others specified in the legislation or in conflict with Florida standards; and rejection of the exclusivity provision.

Since the Commission has not yet assented to these terms and conditions and Florida’s status as a compacting state has not been resolved, effective July 1, 2014, Florida will not recognize approvals for products that have only Compact Commission approval. Insurers will need to have products filed and approved at the Office of Insurance Regulation until such time as Florida is a member.

Please do not hesitate to contact me if you would like to discuss this further or if you have any questions or comments.

Sincerely,

Kevin M. McCarty