



Frequently Asked Questions Regarding *FIN 2017-1: Process for Revisions to Forms and Supporting Documentation in Compact Filings*

Question: To which product lines does FIN 2017-1 apply?

Answer: FIN 2017-1 applies to the revisions of all individual and group product filing submissions, except for Long-Term Care advertising.

Question: When can I make a request to reopen a filing for an amendment?

Answer: Requests to reopen for amendment purposes can be made to filings that have reflected a status of “Closed-Approved” for fewer than 90 days and the forms have not yet been issued. Keep in mind that no new forms can be added to approved filings.

A filing may be reopened at any time for the specific purposes stated in Section I.C.1 of FIN 2017-1.

A request to reopen is usually addressed by the Insurance Compact Office within one business day, unless follow-up is required to determine what you wish to revise and why. You should submit a request when you have the amendment materials ready to submit. A reopened filing will be closed after 10 calendar days if the revised material has not been added.

Question: Can I add new forms to pending filings or make revisions to forms in pending filings?

Answer: If form or actuarial objections have not been issued in the pending filing, new forms or revisions to pending forms can be made. Additional state fees may be required if adding new forms. If form or actuarial objections have been issued in the pending filing, revisions to pending forms can be made. If the revision is not in response to an objection, an amended filing fee will be due. No new forms can be added to pending filings once objections have been issued unless specifically requested by the reviewer.

Question: What is considered a typo for purposes of making a request to reopen a filing in order to amend?

Answer: Typos are strictly construed in determining if it is appropriate to reopen a filing to amend.

The following would be considered appropriate situations to request that a filing be reopened to revise a typo:

- A company has identified a transposed numeral in a closed-approved filing.
- A company has identified a misspelled word, and the correction to the word does not change the meaning of the sentence or provision.
- A company has identified a formatting error, or misplaced section headers.
- A company has identified an inconsistency between the form and actuarial memorandum.

If the “typographical fix” changes the intent of the meaning, then it is not a typographical fix. If the revision changes the meaning of the sentence or provision, it could impact compliance with Uniform Standards.

If you are not sure whether your revision is a typographical error, please contact the Insurance Compact Office.

Question: What is a Supporting Documentation Update filing?

Answer: Supporting Documentation Update (SDU) is a new filing type implemented to accommodate revisions to information provided on the Supporting Documentation tab of the original filing, such as the Statement of Variability or actuarial material. No forms can appear under the Form Schedule tab of the SDU submission. This filing type can be utilized when the supporting documentation of several filings are impacted by utilizing one SDU submission and using the associated filings feature to link the SDU submission to the affected filings. For example, if the company is changing the process by which an electronic application is authenticated, the SDU submission can be associated to all filings containing applications that are affected by this change.

Question: Are state fees required for the new SDU filing type?

Answer: State fees may be required for SDU submissions. In the FIN, please reference *Appendix B: Supporting Documentation Submission Fees by State* to determine what states require fees and the associated amounts for this filing type. As with any filing, fees apply on a per-company basis.

Question: What TOI and sub-TOI do I use for SDU submissions?

Answer: For SDU submissions, utilize the TOI and sub-TOI from the original filing. The original filing is being updated so the TOI and sub-TOI should match. If the SDU submission applies to original filings with different TOIs, choose the most frequently used TOI among the original filings.

Question: Can I submit revised product forms in a SDU filing?

Answer: No, the SDU filing type cannot be used to accommodate revisions to product forms. This would be inconsistent with the premise of an SDU filing, which is to update material

submitted on the Supporting Documentation tab. In fact, *no forms can appear under the form schedule tab of the SDU submission.*

Question: What if I am making a SDU filing to create a new variable item? Shouldn't I replace the approved form?

Answer: This is addressed in Section II.C.2.c of FIN 2017-1. Please provide the approved form showing the revised bracketing as an attachment to the Supporting Documentation tab. Do not replace the approved form in the original filing.

Question: Is the review time for SDU submissions different than review times for other submissions?

Answer: Yes, the review time for SDU submissions is typically shorter than review times for other submissions, at approximately 30 days instead of 60 days.

Question: Are the filing fees for amendments changing?

Answer: No. There is no change to any fee amount on the IIPRC Filing Fee Schedule in relation to FIN 2017-1.

An amendment occurs when an approved filing is reopened for a revision. The criteria for an amendment filing fee is that it is half the current filing fee of the original submission.

Question: What are the Compact filing fees for a new SDU submission?

For purposes of filing fees, an SDU submission is not an amendment because it is a new filing submission. The criteria for SDU submission filing fees is the same as for a new filing, and depends on whether the revision being submitted requires actuarial review based on the uniform standards to which the revision is subject (i.e. form review only, actuarial review only or both form and actuarial review required). The amount of the filing fee can be ascertained from the IIPRC Filing Fee Schedule reference document located on the Insurer Resources page of the Insurance Compact website.

Question: Is there any other guidance the Compact office has issued to provide additional detail on FIN 2017-1?

Answer: Yes, the Compact office has issued additional guidance on FIN 2017-1 through a series of Weekly Tips issued in March and April, 2017. To access these Weekly Tips, search the Weekly Tip Archive by the FIN citation.