

To: IIPRC Office

From: Art Vikari, Foresters

Date: March 26, 2014

Re: Proposed Amendments to Standards for Accelerated Death Benefits

I was recently forwarded a copy of the proposed amended/updated Standard for Accelerated Death Benefits that will be discussed at Friday's "in-person" meeting of the Management Committee. I won't be able to participate as an "interested party", but in reading the changes I had a comment and a question regarding one section that has been updated and was hoping to bring them to someone's attention for consideration before the updated standard is finalized.

Specifically I was looking at the updates made to Notice of Effect of Benefit Payment, Section 3C(1), where in the first paragraph uses the phrase "provided to the applicant at the time of application for accelerated death benefits", when I first read this I took it to mean the time a claim/request for accelerated death benefits was being made and it was not until I read the accompanying Summary of Five-Year Review Comments on Standards for Accelerated Death Benefits, which, in its comment on this change, use the clearer phrase "the statement that is provided at the time of application for an accelerated death benefits product approved by the IIPRC". I suggest that the standard's language could be made clearer by including "form" or "product" in the aforementioned phrase, changing it to "provided to the applicant at the time of application for a form containing accelerated death benefits." Additionally the current standard and the proposed updates to the standard have, what I at least perceive to be, a lack of clarity with regard to both this new statement requirement and the requirement for the statement at the time a request for and/or the actual payment of an accelerated death benefit is made (section 3C(2)), in that while they indicate, in Additional Submission Requirements, section 1A(2), that the statement(s) shall be included with the submission, they don't clearly articulate whether that "submission" is for review and approval – which would I assume require them to contain an "IIPRC formatted form number", or just as supporting/informational documentation.

Coincidentally we are in the process of submitting new Accelerated Death Benefit riders and were unsure as to the current filing requirements for our "claim time" disclosure statement – Additional Submission Requirements paragraph 2 - , is the form to be included as "filed for approval" , with an IIPRC form number, or is the form to be included as supporting documentation?

Thanks in advance.

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