OREGON DFR PROPOSED REDLINES TO

UNIFORM STANDARDS DEVELOPMENT GUIDELINES

March 15, 2023

To the original, p. 2, FN 1:

Drafts of new or amended Uniform Standards developed internally by Compact staff are developed working with subject matter experts (regulators, industry, and Compact reviewers). Research tools used in development include review of current standards with similar requirements, applicable state statutes and regulations, state check lists, product review via SERFF Filing Access (SFA), direct communication with states to verify SERFF records and the scope of approvals, and review of the Compact's prefiling communication database.

To the original, p. 9, Drafting Principles #7:

- 7. Unless consumer protection is materially improved by an alternative provision a Uniform Standard:
- a) Should follow language in the NAIC model law, or regulation in circumstances where the model language has been adopted by a majority of Compacting States.
- b) Should follow provisions in State statutes, regulations, or rules where a majority of Compacting States have a similar provision.
- c) May follow provisions in wide array of forms available through SERFF Filing Access that are approved or otherwise authorized $^{\times}$ for use in a majority of the Compacting States. These provisions should be considered for inclusion in Uniform Standard.

Footnote x:

In drafting new or amended Uniform Standards, Compact staff must communicate with states to verify SERFF records and the scope of approval or authorization