

From: [Williams, Alisha](#)
To: [Schutter, Karen](#); [Ezalarab, Susan](#); [Shackelford, Cara](#); [McElduff, Becky](#)
Cc: [Dubsky, Sara](#)
Subject: FW: Comments on Amending the Uniform Standards for waiver of premium and waiver of surrender charges for life policies and annuity contracts
Date: Tuesday, June 17, 2025 9:35:15 AM
Attachments: [image002.png](#)

Alisha Williams

Intake Coordinator

Interstate Insurance Product Regulation Commission

From: Debra Diaz-Lara <Debra.Diaz-Lara@tdi.texas.gov>
Sent: Tuesday, June 17, 2025 8:03 AM
To: IIPRC - Comments Shared Mailbox <comments@insurancecompact.org>
Subject: Comments on Amending the Uniform Standards for waiver of premium and waiver of surrender charges for life policies and annuity contracts

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1. Are companies filing riders with states to allow Waivers of Premium or Surrender Charges for certain financial hardship situations? **Texas hasn't seen many riders that waive surrender charges or premiums for financial hardship. Most of the riders filed for disability or confinement. Currently, for Life products, waiver of premium provisions or riders allow for unemployment and financial hardship. For annuities, Texas allows for unemployment. Since we do not have an actual statute or rule for annuities, we don't see where financial hardship would not be a reason to waive surrender charges.**
2. Are there specific categories of financial hardship that the PSC should consider if amending the standards? **None at this time.**
3. Are companies filing riders with states to allow waivers due to changes in the federal tax code? **Texas has not seen this type of waivers being filed.**
4. Are companies filing riders with states to allow waivers related to natural disasters such as floods, tornados, or home displacement related to disasters? **Texas has not seen these types of waivers being filed.**
5. Are there other categories that should be permitted as waiver triggers and if so, why? **None at this time.**
6. Do these categories change if it is a Waiver of Premium or a Waiver of Surrender Charge benefit?

N/A

7. Do these categories change if the waiver is attached to a life insurance or an annuity product?

N/A

8. What are the reasons companies are expanding beyond traditional triggers in Waiver of Premium or Surrender Charge benefits? N/A
9. The PSC welcomes comments on how the companies address states' concerns, if any, that the risk triggering the benefit may be outside of the state's definition of life insurance and/or annuity business. Texas has not had any recent filings where the waiver benefit is outside of the definition of life insurance or annuity business.
10. Are these additional categories (home displacement, financial hardship, changes in the federal tax code) available in the marketplace today? Texas has not had any company file a waiver benefit for home displacement, financial hardship, or changes in the federal tax code in the past few years.

Please submit your comments to comments@insurancecompact.org by **Friday, August 1, 2025**. The PSC plans a public call to discuss the comments on August 5, 2025.

Debra Diaz-Lara

Deputy Commissioner
Life and Health Division
512-676-6613

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