

From: [Johnson, Valerie](#)
To: [IIPRC - Comments Shared Mailbox](#)
Cc: [Kreighbaum, Scott](#)
Subject: RE: Request for Comments on Amending the Uniform Standards for Waiver of Premium and Waiver of Surrender Charges for Life Policies and Annuity Contracts
Date: Friday, August 1, 2025 4:08:44 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

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Hello,

Please see the below comments from National Life Group regarding the survey questions about Waiver of Premium and Waiver of Surrender Charges. If possible, we would prefer that these comments be kept anonymous in any discussions or meeting minutes.

We have filed a variety of waiver riders with the states, on both our life and annuity products (as well as accelerated benefit riders and guaranteed lifetime withdrawal benefits), related to financial hardship including various illness or medical triggers, unemployment, and other tax-code related triggers. These have included waiver of premium, waiver of monthly deduction, and waiver of surrender charge riders. We strongly prefer to file with the Compact when possible, and are in favor of expanding the Compact standards related to these features.

More specifically, the federal tax code allows for financial hardship withdrawals such as unforeseeable emergencies (457 plans) and disability/hardship distributions (403b and 401k plans). The PSC should consider amending the standards to accommodate any financial hardship withdrawals permitted under the federal tax code, including recent and future tax code changes. We are also interested in specific triggers related to natural disasters, accidents involving property or health, unemployment, caregiving situations, and in general any health or medical situations that also involve financial hardship.

The intention of these supplemental benefits is to keep a life insurance contract in-force during a time of financial or personal crisis, or to offer a financial cushion via access to the value in an annuity contract; not to offset the actual loss. These benefits on life or annuity contracts are not a function of the direct costs or severity of loss related to the financial hardship, and therefore not under the P&C or health insurance umbrellas.

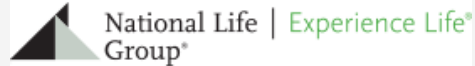
Additionally, a waiver of premium rider for a natural disaster such as tornado,

hurricane, or flood damage, is analogous to the recent action taken by several state insurance commissioners requiring extended grace periods or repayment options during specific disaster events in their states. To this end, we would also like the PSC to consider expanding waiver standards to include extended grace period designs, and/or repayment plans (perhaps involving reduced levels).

Thank you!

Valerie Johnson

Director – Policy Forms R&D, Life & Annuity Solutions



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From: Insurance Compact <notice@insurancecompact.org>

Sent: Monday, June 16, 2025 12:42 PM

To: Johnson, Valerie <VJohnson@nationallife.com>

Subject: Request for 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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Interstate Insurance Product Regulation Commission

Request for Comments on Amending the Uniform Standards for Waiver of Premium and Waiver of Surrender Charges for Life Policies and Annuity Contracts

The Product Standards Committee (PSC) is considering amendments to the Uniform Standards for Waiver of Premium and Waiver of Surrender Charges for Life Policies and Annuity Contracts. The current Uniform Standards permit waivers for the following qualifying event triggers: the diagnosis of limited life expectancy, impairment, disability, or the occurrence of unemployment.

The Compact Office requested this issue be added to the Uniform Standards Development prioritization list for 2025 due to the number of requests it has turned down from filing companies for waiver triggers.

The PSC is requesting comments about amending the categories to expand the triggers for Waiver of Premium or Waiver of Surrender Charges in the applicable Life Insurance and Annuity Uniform Standards.

The PSC is seeking input on the following questions:

1. Are companies filing riders with states to allow Waivers of Premium or Surrender Charges for certain financial hardship situations?
2. Are there specific categories of financial hardship that the PSC should consider if amending the standards?
3. Are companies filing riders with states to allow waivers due to changes in the federal tax code?
4. Are companies filing riders with states to allow waivers related to natural disasters such as floods, tornados, or home displacement related to disasters?
5. Are there other categories that should be permitted as waiver triggers and if so, why?
6. Do these categories change if it is a Waiver of Premium or a Waiver of Surrender Charge benefit?
7. Do these categories change if the waiver is attached to a life insurance or an annuity product?
8. What are the reasons companies are expanding beyond traditional triggers in Waiver of Premium or Surrender Charge benefits?
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.
10. Are these additional categories (home displacement, financial hardship, changes in the federal tax code) available in the marketplace today?

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.

If there are any questions, please contact the [Insurance Compact Office](#).

The Insurance Compact enables state insurance regulators to develop uniform national standards for asset protection insurance products, such as life insurance, annuities, disability income and long-term care insurance. The Insurance Compact establishes a central filing point for these insurance products, enhancing the speed and efficiency of regulatory decisions and allowing companies to compete more effectively in the modern financial marketplace, while continuing to provide protection for consumers.

For more information, visit the [Insurance Compact's website](#).

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