



DATE: **October 30, 2025**

TO: **Insurance Compact Management Committee**

FROM: **Product Standards Committee**

RE: **PSC Recommendations for the Uniform Standards Identification List for 2026**

The Product Standards Committee submits its recommendation for the prioritization of Uniform Standards Development. The system for the identification and prioritization of new, or amendments to, Uniform Standards is an annual process. This process allows input by interested parties, including commissioners, regulators, legislators, consumer representatives, insurers, the Legislative Committee, the Consumer Advisory Committee, the Industry Advisory Committee, and the Compact Office.

Through the annual process, Compact members can determine if the prioritization of Uniform Standards development is aligned with the organization's strategic initiatives and incorporate any implications to the operating revenues or expenses of the organization in the budget planning process.

The Uniform Standards Identification List for 2026 Prioritization (2026 Identification List) was compiled in early July based on Uniform Standards Development requests submitted by June 30, 2025, along with the Uniform Standards remaining for development from the 2025 Uniform Standards Prioritization list.

The Product Standards Committee (PSC) reviewed and prepared a list of the requests it received. The Product Standards Committee held public calls on August 5, 2025, and October 7, 2025, to receive comments on the list of requests and the carryover items from 2025. The PSC reviewed the comments from the public calls and prepared prioritization of the Uniform Standards for development in 2026 by very high, high, medium, low, and remove. The PSC also noted where further research and discussion on the item is needed before drafting the requested standard.

Please contact Andria Seip, Chair of the Product Standards Committee, or Susan Ezalarab, the Compact Office's Regulatory Coordinator Consultant, if there are questions.

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Product Line	Uniform Standard Request	Requesting Party	Description of Request	Reason / Explanation	Refer to Actuarial Working Group	Recommended Priority
1. Individual Annuity	CARRYOVER REQUEST: New Standard Protected Income Solutions (PIS).	Prudential	We are requesting that the PSC review our Proposed Standards for Protected Income Solutions (PIS) for Individual Deferred Index Linked Variable Annuity Standards. A Protected Income Solutions (PIS) allows for income payments to increase, decrease, or stay the same based upon the performance of the index strategies chosen, subject to the levels of downside protection included in those index strategies. The proposed standards	Uniform Standards for Protected Income Solutions (PIS) have been categorized by the PSC as "Very High" on the 2025 Prioritization List. Based on this categorization, we wanted to be proactive and provide the PSC with proposed Protected Income Solutions (PIS) Standards that align with current IIPRC Standards for Individual Deferred Index Linked Variable Annuity Contracts. Protected Income Solutions (PIS) that are built into Individual Deferred Indexed Linked Variable Annuity Contracts or added to such contracts by Rider, Endorsement, or Amendment, are currently approved in all Compacting States.	YES	VERY HIGH Came up during ILVA standards discussion and requires a separate standard. Can start with industry-submitted draft.

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			for Protected Income Solutions (PIS) were developed with this benefit in mind and are meant to align with the current IIPRC Standards for Individual Deferred Index Linked Variable Annuity Contracts.			
2. Individual Annuity	CARRYOVER REQUEST: Amend Individual Deferred Index Linked Variable Annuity (ILVA) Standards.	ACLI and Compact Office	ACLI: Amendments to the Right to Examine Compact Office: Additional requests arising out of product reviews.	The Management Committee considered the request of the ACLI to consider an amendment to the Right to Examine section and agreed to add it to the list for 2025.	YES	VERY HIGH Consider industry-submitted draft for Right to Examine Compact Office has certain adjustments.

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3. Individual Annuity	NEW: Amend Individual Immediate Non-Variable Annuity Contract Standards.	ACLI	Amend Section 3.R.(4) of the Individual Immediate Non-Variable Annuity Contract Standards so it is consistent with Section 3.T.(4) of the Individual Deferred Paid-Up Non-Variable Annuity Contract Standards.	Some of our members currently use the purchase rates that are described in Section 3.T.(4)(b) of the Individual Deferred Paid-Up Non-Variable Annuity Contract Standards in their administrative systems and pricing models for Individual Immediate Non-Variable Annuities. For consistency purposes, we are requesting that the same option be provided under the Individual Immediate Non-Variable Annuity Contract Standards.	NO	VERY HIGH Consider industry-submitted proposed language.
4. Individual Annuity	CARRYOVER REQUEST: Amend Individual Deferred Paid-Up Non-Variable Annuity Contract.	ACLI	We request that the Compact amend the existing standards for Individual Deferred Paid-Up Non-Variable Annuities (commonly marketed as “Deferred Income Annuities” and “Longevity Annuities”) to allow the division of annuitants into par and non-par	Add the par/non-par distinction to the actuarial certification to address inconsistency between the actuarial certification required in Section 1.B.1.(g) and the statement in Section 3.B.(1)(c)(i) that “annuitants of annuity contracts that are not expected to pay dividends shall be considered a separate class from annuitants of annuity contracts that are expected to pay dividends”. To be meaningful, the division of annuitants into par and non-par classes should apply to both the initial premium requirements (Section 1.B.(1)(g)) and the additional premium requirements (Section 3.B.(1)).	NO	VERY HIGH Consider industry submitted proposal language.

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			classes to apply to both the initial premium requirements of Section 1.B.(1)(g) and the additional premium requirements of Section 3.B.(1)(c)(i).			
5. Individual Annuity	CARRYOVER REQUEST: Amend Additional Standards of Waiver of Surrender Charge Benefit.	Compact Office	Expand the categories of what is considered a qualifying event under Section 3(3) of the Additional Standards of Waiver of Surrender Charge Benefit.	The Compact has received waiver benefits for qualifying events that are not specifically identified under the uniform standards as qualifying events. As they are not identified as a qualifying event under the standard, the Compact has not been able to review the benefits. When there is no charge associated with the benefit, it is truly a consumer benefit to have a way to withdraw money from an annuity without being assessed charges. Expanding the qualifying events identified in the standard would allow companies to offer these consumer benefits that could be filed and reviewed through the Compact.	NO	HIGH In process, PSC is currently addressing whether to expand waiver triggers, including for Waiver of Premium.

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6. Individual Annuity, Group Annuity	CARRYOVER REQUEST: New Uniform Standard for Contingent Deferred Annuities (CDAs).	ACLI	We request that the Compact develop new Uniform Standards for Contingent Deferred Annuities (CDAs).	Contingent Deferred Annuities (CDAs) provide customers with flexibility to keep their assets in managed accounts with their trusted financial professionals or retirement plans and provide longevity protection at the same time. Those individuals with assets in these vehicles are currently unprotected from longevity risk and subject to additional risks (inflation, sequence of returns) as they enter the decumulation phase of retirement. This product wraps certain investments in these vehicles and pays out a lifetime income stream once the account value is depleted. The market would benefit from the clarity and consistency the Interstate Compact would bring to the Contingent Deferred Annuity (CDA) market. This would provide a structure for states to adopt these standards using the latest Model 805 requirements (which include Contingent Deferred Annuity (CDA) requirements) without requiring individual states to take additional regulatory or legislative action and to implement the 2015 guidance from the Contingent Deferred Annuity (CDA) Working Group.	NO	LOW TO REMOVE The PSC has concluded this product is not yet conducive for Uniform Standards. It is not a product that states commonly receive, and there is concern that lack of commonality among the states in terms of requirements would cost significant time in development. Several states would consider an opt-out as they do not allow CDAs.

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7. Individual Life	NEW: Amend all individual standards.	Nebraska	Amendment for Consistency to Life Standards: Requiring notices send prior to lapse that are sent to the owner to now also be sent to the assignee.	Uniform Standards for Life products allow for assignment; however, not all standards have the same requirements to notify assignees prior to lapse. My proposal is the uniform use of previously approved language to all applicable Life Standards. Term Life, Whole Life, Endowment Life, Non-Variable Life, Variable Life Uniform Standards are all within the scope. The assignee, until released, has a vested interest in the continuation of the policy therefore the assignee should also receive notices prior to a policy lapsing. Recent case law and actions by state legislators have confirmed the importance of these notices.	NO	VERY HIGH Member state request and make consistent with other Compact Standards.
8. Individual Life	CARRYOVER REQUEST: Amend Individual Flexible Premium Adjustable Life Insurance Policy Standards and Individual Flexible Adjustable Variable Life Insurance Policy Standards.	Compact Office	Amendments to provide guidance on several actuarial issues.	The Compact Office recommends guidance and clarifications to these Flexible Premium Adjustable Standard to address questions and concerns that have arisen during the actuarial review of these products.	YES	HIGH LATF is considering requests from the Compact Office regarding interpretations of UL Model. These are clarification amendments to provide more detail in the

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						Standards for actuarial requirements.
9. Individual Life	CARRYOVER REQUEST: New standard for Bonus Benefits for Individual Adjustable Life.	Compact Office	Develop a new standard for review of bonus benefits associated with Individual Adjustable Life Insurance Policies. The Individual Annuity Bonus Standards can be used as a starting point in drafting these new standards.	In order to be consistent in review approach of these similar benefits across product lines, a new standard similar to the existing bonus standard available on the Individual Annuity product is recommended for development.	YES	HIGH In process. Referred to AWG for development of actuarial requirements.

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10. Individual Life	CARRYOVER REQUEST: New standard for Registered Indexed-Linked Variable Life and Adjustable Variable Life.	ACLI, several companies, and Compacting States	New Uniform Standard for Index-Linked Life products. These products are similar to their counterparts on the annuities side. Compact develop new Uniform Standards or Amend the existing “Additional Standards for Index-Linked Crediting Benefit Features for Individual Adjustable Life Policies,” to provide for registered Index-Linked Individual Universal Life Products.	Companies have been asking to file these products, but the current Uniform Standards restrict products to unit linked. Registered Indexed-Linked products are becoming more prominent in the Life Insurance and Annuity markets. These products have been approved in a majority of states, with Oregon being the exception. Compact standards would help companies provide uniform administration while enhancing speed-to-market.	YES	MEDIUM PSC has questions as there is no actuarial standard or guideline. The PSC is considering creating a subgroup to discuss further.

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11. Group Annuity	NEW: Variable Group Annuity Uniform Standard.	Standard	New standard that allows the Compact to review and approve Group Annuity Contracts that include BOTH a Fixed and Variable investments. The current Standard only allows for review and approval for Group Fixed Annuity Contracts for Employer Groups and Guaranteed Investment Contracts for Employer Groups under IIPRC-A-02-G and IIPRC-A-02-G-GIC.	This request is being submitted as a large portion of the Retirement Plan industry includes Group Annuity Contracts that offer both fixed and variable investment options, typically in the form of riders and schedules attached to a base contract. This type of contract and rider/schedule program has been approved in all Compact States.	NO	HIGH Draft at same time as group structured annuities with a subgroup approach.

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12. Group Annuity	NEW: Group Structured Settlement Annuity Uniform Standard.	ACLI	New Uniform Product Standards for Group Structured Settlement Annuities (SSAs). These new standards could be based on related language contained in the existing Individual Immediate Non-Variable Annuity Contract Standards.	Many of our members utilize Structured Settlement Annuities (SSAs) on the institutional side of their businesses and it would be beneficial for them to have uniform standards for consistency purposes and ease of filing.	NO	HIGH Draft at same time as variable group annuity with a subgroup approach.

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13. Group Life	CARRYOVER REQUEST: New Uniform Standards for Group Private Placement / Variable Universal (VUL) Products.	ACLI	We request that the Compact develop new Uniform Standards for Group Private Placement/Variable Universal Life (VUL) Products.	The adoption of these new standards would promote uniformity across all Compact member jurisdictions and provide consistency in the sales and administration of Group Private Placement/Variable Universal Life (VUL) Policies. It would also allow for improved speed-to-market since companies would only have to work with one entity (the Compact) in order to obtain approval in all of the Compact member jurisdictions, as opposed to having to work with each of those jurisdictions separately. In addition, new standards would greatly streamline the carriers' filing and forms maintenance process as it eliminates the need for special state versions.	NO	MEDIUM The PSC views this as a specialized product and is open to comments on whether this is a common product issued to Employer Groups Or Non-Employer Groups.

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14. Group Life	NEW Amend Group Term Life for Accidental Death and Dismemberment.	AFLAC	Expand the scope of citation IIPRC-L-04-G-EG-ADDB Uniform Standard to state an employee covered under a Group Term Life Policy providing employee and dependent AD&D Supplemental and/or Voluntary Benefits shall have the option to waive Dependent Life Insurance and elect Dependent AD&D benefits when employers allow such elections within their Group Term Life Benefit Plans and Enrollment platforms. We ask that the standard clarify such dependent benefit	Many large employer benefit platforms do not require dependent life benefits to be selected for an employee to elect dependent AD&D benefits within the policy. This is a common plan design in the National Account and large Group Market. It is standard practice for employers in this space to allow employees to freely elect dependent benefits within a Group Life Policy based on their personal preferences and needs.	NO	HIGH Start off with industry presentation of the large group market for Term Life Benefits and Dependent Coverage.

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			elections within the Certificate Holder's term life/AD&D policy do not constitute a standalone AD&D Benefit Plan. This standard and Standard IIPRC-L-104-G-EG are silent on the issue of employee and dependent elections of AD&D benefits. There is no prohibition in either standard regarding the employee's right to waive Dependent Life Insurance and elect Dependent AD&D Benefits.			
15. Group Life/ Disability Income	CARRYOVER REQUEST: Standalone Accidental Death and Accidental Death and Dismemberment	ACLI	We request that the Compact develop new Uniform Standards for Group Accidental Death and	The Compact does not currently have uniform product standards for Group Accidental Death Products, forcing companies to file with the states individually. Furthermore, some companies have had to file several versions of this product over time, which increases the amount of time and effort that has to be	NO	ON HOLD Pending Officer & Management Committee Discussion

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	Uniform Standards.		Dismemberment (AD&D) products.	expended by both insurers and the states. The individual state filings also increase the complexity of administration due to variations among the different jurisdictions.		
16. Individual Life/ Disability Income	CARRYOVER REQUEST: Standalone Individual Accidental Death Benefit and Accidental Death and Dismemberment Uniform Standard.	Compact Office	In consultation with the Compact Officers, the Compact Office requests the Commission develop a new Uniform Standard for Standalone Accidental Death Benefit.	During the Compact Roundtables, industry representatives as well as some Compacting States requested these Uniform Standards to cover products that are issued separately from an All-Cause Life Insurance or Disability Income Policy.	NO	ON HOLD Pending Officer & Management Committee Discussion
17. Disability Income	CARRYOVER REQUEST: Paid Family Leave (PFL) Uniform Standard for Group Disability Income.	ACLI	We request that the Compact develop new Uniform Standards for Paid Family Leave (PFL) insurance products, including riders.	Following the adoption of NCOIL's Paid Family Leave (PFL) Insurance Model, there has been increased state activity to adopt or recognize Paid Family Leave (PFL) as a new line of insurance in which any insurer licensed to transact Life Insurance or Disability Income Insurance may also provide coverage for Paid Family Leave (PFL). Similarly, many carriers are looking to provide this new coverage through either a standalone product or as a rider but cannot do so under current Uniform Standards. Several Compacting States already allow for Paid Family Leave (PFL) coverage.	NO	HIGH Compact Office will have informational sessions, and PSC may wish to survey states

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				We would recommend that the development of Paid Family Leave (PFL) standards be fashioned after the NCOIL Model.		
18. All product lines	CARRYOVER REQUEST: New Uniform Standard for Value-Added Services.	Compact Office and ACLI	Compact Office: In consultation with the Compact Officers, and discussed during Compact Roundtables, the Compact Office requests the Commission develop Uniform Standards for requirements for non-insurance benefits, commonly referred to as Value-Added Services to be added to an Individual Life Insurance Policy by Rider, Endorsement or Amendment or by incorporation into a policy form. Additional	During the Compact Roundtables, industry representatives raised the desire to file more specific Value-Added Services Benefits with the Compact to be used with their products. Having specific Uniform Standards for Value-Added Benefits—both those that do affect policy values like a credit or premium discount, and those that do not affect policy values—could reduce mix and match and the filing of basic life or annuity products with the states. ACLI: As the number of insurance policies being sold with Value-Added Services (VAS) increases, there is an increasing need for the development of a set of Uniform Standards for Value-Added Services (VAS). The NAIC's Uniform Unfair Trade Practices Act was recently amended to explicitly allow for Value-Added Services (VAS) to be offered without being disclosed in the policy, provided they fall into one of several enumerated buckets and also adherence to several other requirements.	NO	ON HOLD Pending Officer & Management Committee Discussion

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			Standards for All Benefit Features while recognizing the benefits are not insurance and are subject to unfair trade practices in states. ACLI: We request that the Compact develop new Uniform Standards for Value-Added Services (VAS), preferably as a stand-alone standard that could be applied to any product, including Life Insurance, Disability Income Insurance and Group Insurance.			

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19. All lines	NEW: Long Term Care Wellness Rider Uniform Standard.	Equitrust	Develop Uniform Standards and requirements for a Wellness Benefit and the corresponding services to be added to an Individual Annuity/LTC combo product contract by Rider, Endorsement, Amendment or by incorporation into.	The Wellness Rider would be a voluntary program which rewards contract holders for taking proactive steps to improve their health and aging experience. The expectation is by participating in the wellness program that they will experience lower incidence rates and improve their life-expectancy. If certain milestones are attained in the program; the contract holder may earn additional long-term care benefits. Second, this Value-Added Wellness Rider would be used in conjunction with the Long-Term Care Riders and reduces the mix and match instances for companies when filing annuities with Long-Term Care Riders. Having this as a standard in the Compact would encourage companies to rely on the Compact and reduce the dependency on individual state filing for approvals. This would simplify the filing experience for the companies.	NO	ON HOLD Pending Officer & Management Committee Discussion on question of standard for Value-Added Services and /or Ancillary or Incidental Benefits.
20. All product lines	CARRYOVER REQUEST: New Uniform Standard for Ancillary/Incidental Benefits.	ACLI	We request that the Compact develop new Uniform Standards for Ancillary/ Incidental Benefits. These benefits do not include	As the number of insurance policies being sold with ancillary and incidental benefits increases, along with the number of states that are allowing them to be filed, there is an increasing need for the development of a set of Uniform Standards for Ancillary and Incidental Benefits.	NO	HIGH PSC suggests a survey of the states on their laws and types of benefits allowed and getting

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			HIPAA-excepted supplemental benefits such as specified disease, hospital indemnity, accident-only, dental, vision and Medicare supplement.			guidance from the Mgmt. Committee.
21.	NEW: New uniform standard for Critical Illness.	Western Southern	New Uniform Standards for individual Critical Illness insurance policies. These standards would provide a consistent regulatory framework for a product type that has become increasingly important in meeting consumers' needs for financial protection in the event of serious health conditions, such as cancer, heart attack, stroke,	There are Critical Illness Insurance Policies on the market today, however carriers are required to file these policies with Compact member states individually. Due to the lack of existing Compact standards, carriers are unable to take advantage of the efficiencies offered by the Compact for this product line. The creation of new standards would promote regulatory uniformity, streamline product filing processes, and ultimately enhance speed to market, while ensuring strong consumer protections.	NO	REMOVE Compacting States do not consider stand-alone critical illness to fall within Compact product lines.

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			and other specified illnesses. Critical Illness policies provide fixed benefits upon diagnosis of covered condition and often supplement traditional health and disability coverage.			
Life	Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events Additional Standards for Waiver of Premium Benefits for Child Insurance in the Event of	ACLI	We request that the above-listed standards for waiver of premium benefits be amended to also allow for insurers to offer repayment plans to those policyholders who are behind on their premiums and are either (a) at risk of lapsing their policies or (b) have already lapsed their	Amending these standards to allow for repayment plans, in addition to the waiver of premium, would give both insurers and policyholders additional flexibility during financially challenging times. State insurance departments have encouraged carriers to offer repayment plan options for financial hardship under certain circumstances. During the pandemic, many states required insurers to offer repayment plans to their policyholders after their Do Not Lapse (DNL) periods expired. Additionally, some states require insurers to offer repayment plan options in their premium grace period bulletins after a natural disaster.		

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	Payor's Total Disability or Death Group Term Life Insurance Uniform Standards for Waiver of Premium While the Employee is Totally Disabled Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events for Whole Life Insurance Policies and Certificates		policies and desire reinstatement.			