



DATE: December 10, 2025

TO: Interstate Insurance Product Regulation Commission

FROM: Product Standards Committee(PSC)

RE: Report of the Product Standards Committee Activities for Joint Meeting of the Management Committee and Commission

The PSC is currently working on an amendment to the Individual Deferred Paid-Up Non-Variable Annuity Contract Standards and amendments to the Standards for Accidental Death Benefits and the Additional Standards for Accidental Death and Dismemberment Benefits.

Each year the Product Standards Committee reviews requests for new or amended uniform standards, prioritizes the requests, and submits the list to the Management Committee for consideration. The PSC held public calls on August 5, 2025, and October 7, 2025, to receive comments on requests for new or amended standards for 2026. The draft Uniform Standards Identification List for 2026 was referred to the Management Committee on October 30, 2025.

The PSC stands ready to respond to other requests from the Management Committee and the Commission regarding Uniform Standards development. Please contact Andria Seip of the Iowa Insurance Division, Chair of the Product Standards Committee, or Susan Ezalarab, the Compact Office's Regulatory Coordinator Consultant.



DATE: December 10, 2025

TO: Joint Management Committee & Commission

FROM: Rulemaking Committee (RMC)

RE: Report of the Rulemaking Committee for Joint Meeting of the Management Committee and the Commission

The Rulemaking Committee is working on the request from the Management Committee made during the in-person meeting of the joint Management Committee and Commission in August to develop procedures for appeal to a member-regulatory body of Compact Office application of the Uniform Standards during a filing review.

The Rulemaking Committee has outlined a process for intermediate review within the Compact product filing process. This process occurs when the filer requests review of the Compact Office application of the Uniform Standards or Operating Procedures during the review of a product filing submission. The filer may seek intermediate review by a member body appointed by the Management Committee. The purpose of this process is to promote fairness, efficiency, and transparency in decision-making by allowing a member body to address important issues of interpretation before final disposition of a product filing by the Compact Office.

The Rulemaking Committee has exposed draft procedures for public notice and comment and will hold a public call to discuss on Wednesday, January 21, 2026 at 3 pm ET. More information can be found on the Events Calendar of the Compact website.



DATE: December 10, 2025

TO: Joint Management Committee & Commission

FROM: Karen Schutter, Executive Director

RE: Operational Report of the Executive Director for December 10th Joint Meeting of the Management Committee and Commission

The 8th Compact Roundtable was held on Wednesday, November 5th at the Joslyn Museum in Omaha, Nebraska. Directors Deiter, Dunning, Dwyer, and Nelson and Commissioners Grant and Pike attended along with 14 regulators from 11 Compacting States. Laura Arp, Deb Darcy and Dick Weber of the Consumer Advisory Committee and Ashley Beaudry, Andrea Davey, Wayne Mehlman, and Amanda Herrington of the Industry Advisory Committee attended. In addition, twenty-seven (27) company representatives from 23 companies participated. The attendees viewed a series of vignettes outlining how the consultation and advisory initiative outlined by the Adjunct Services Committee would work. After each vignette, discussions were held in breakout groups and useful feedback was provided.

The Compact Office is reaching out to member states to gauge their interest in participating in a pilot of these services where it would facilitate a collaborative forum to hear from companies before they submit their product or forms state-by-state. The key advantages for member states is the efficiency this process can offer as states participate collectively rather than scheduling multiple one-on-one meetings with the company. It also gives states a chance to hear how others are approaching the product. And perhaps most importantly, states benefit from the Compact Office's expertise in product and actuarial support, along with access to detailed standards that help guide a thorough and consistent product analysis. An e-mail was sent to all Compacting State Commissioners and their designated representatives on December 2nd requesting interested states sign up by Friday, December 19th. The goal is to have at least 30 states participating in the pilot.

The Compact Office completed a training session for regulators regarding basic information to understand and review life insurance products. The after-session survey responses were very positive and the Compact Office is working with the NAIC to incorporate this content into NAIC Compass.

The Compact Office will send an email to Commissioners/Directors/Superintendents to appoint their designated representative(s) for the upcoming annual period. The Compact Bylaws describe a designated representative as *a person or persons to serve under the direction of the member as the member's designee with respect to Commission business, including attending Commission meetings, voting, and serving on one or more commission committees*. The Compact Office will also be sending annual surveys to committee members as we ask for your feedback as part of the Commission's governance program to improve the effectiveness of the processes.

Please contact Karen Schutter, Executive Director or Sara Dubsky, Chief of Staff for questions or further information.

INTERSTATE INSURANCE PRODUCT REGULATION COMMISSION (INSURANCE COMPACT)

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**JOINT MEETING OF THE MANAGEMENT COMMITTEE AND THE
INTERSTATE INSURANCE PRODUCT REGULATION COMMISSION**

Tuesday, August 12, 2025

**10:45 am ET / 9:45 am CT / 8:45 am MT / 7:45 am PT / 6:45 am AKT / 4:45 am HT
Minneapolis, MN**

AGENDA

1. **Roll Call**
2. **Welcome and Dialogue with the Members of the Legislative Committee**
3. **Management Committee and Commission Consideration of Adoption of the New and Amended Group Life and Group Annuity Uniform Standards:** Consider final action on proposed new and amended Group Life and Group Annuity Uniform Standards.

EXPLANATION: This is a roll call vote action item to consider final action on the noted new and amended Uniform Standards. The proposed Uniform Standards were published on June 9 and a public hearing was held on July 31, 2025. The specific Uniform Standards are as follows:

New Uniform Standards

- Uniform Standards for Riders, Endorsements or Amendments Used to Effect Group Annuity Contract Changes
- Uniform Standards for Riders, Endorsements or Amendments Used to Effect Group Annuity Certificate Changes
- Additional Standards for Forms Used to Provide Tax Qualified Plan Provisions for Group Annuity Contracts
- Additional Standards for Graded Death Benefit for Group Term Life Insurance Policies and Certificates
- Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events for Group Term Life Insurance Policies and Certificates
- Additional Standards for Forms Used to Provide Tax Qualified Plan Provisions for Group Life Insurance Policies

Amended Uniform Standards

- Group Fixed Annuity Contract Uniform Standards
- Uniform Standards for Group Guaranteed Interest Contracts for Non-Variable Annuities
- Group Annuity Certificate Uniform Standards

4. **Report and Recommendation of the Rulemaking Committee and Consideration by the Management Committee to Approve the Report and Recommendation**

EXPLANATION: The Rulemaking Committee expects to bring forward a recommendation to the Management Committee for an accelerated rulemaking option.

5. Report and Recommendation of the Adjunct Services Committee and Consideration by the Commission to Approve the Report and Recommendation

EXPLANATION: The Adjunct Services Committee expects to bring forward a recommendation to the Commission regarding piloting the Consultation and Advisory Services Office (CASO).

6. Consent Agenda: Joint Action Item by the Management Committee and Commission to Adopt the Reports of the Committees, Minutes of the April 1 Joint Meeting of the Management Committee, and the July 31 Management Committee Meeting.

EXPLANATION: The action item is to consider adoption of the following written reports by consent: the minutes of the Joint Meeting of the Commission and Management Committee on April 1, minutes of the Management Committee meeting on July 31, and reports from the Finance and Product Standards Committees.

7. Executive Director's Operational Report

EXPLANATION: The Executive Director will provide an update on the financial and operational activities of the organization.

8. Any Other Matters

9. Adjourn

Members of the Commission and Department Staff in Attendance:

Director Eric Dunning, Chair, Nebraska

Commissioner Allan McVey, Vice Chair, West Virginia

Commissioner Marie Grant, Maryland, Treasurer

Director Elizabeth Kelleher Dwyer, Past Chair, Rhode Island

Commissioner Mark Fowler, Alabama

Sara Bailey as a designated representative for Acting Director Heather Carpenter, Alaska

Gioconda (Gio) Espinosa as a designated representative for Interim Director Maria Ailor, Arizona

Barbara Richardson, Arizona

Kyla Hoskins as a designated representative for Commissioner Michael Conway, Colorado

Alexander Borkowski as a designated representative for Commissioner Andrew Mais, Connecticut

Jessica Luff as a designated representative for Commissioner Trinidad Navarro, Delaware

Howard Liebers as a designated representative for Commissioner Karima Woods, District of Columbia

Kathleen Nakasone as a designated representative for Commissioner Scott Saiki, Hawaii

Director Dean Cameron, Idaho

Director Ann Gillespie, Illinois

Commissioner Doug Ommen, Iowa

Andria Seip, Iowa

Victoria Hastings as a designated representative for Commissioner Holly W. Lambert

Julie Holmes as a designated representative for Commissioner Vicki Schmidt, Kansas

Commissioner Sharon P. Clark, Kentucky

Frank Opelka as a designated representative for Commissioner Tim Temple, Louisiana

Commissioner Michael T. Caljouw, Massachusetts

Julie Merriman as designated representative for Director Anita Fox, Michigan

Tammy Lohmann as a designated representative for Commissioner Grace Arnold, Minnesota

Bob Williams as a designated representative for Commissioner Mike Chaney, Mississippi

Jo DeLuc as a designated representative for Director Angela L. Nelson, Missouri

Commissioner James Brown, Montana

Martin Swanson, Nebraska

Interim Commissioner Ned Gaines, Nevada

Victoria Fowler as designated representative for Commissioner DJ Bettencourt, New Hampshire

Viara Ianakieva as designated representative for Superintendent Alice Kane, New Mexico

Chrystal Bartuska as a designated representative for Commissioner Jon Godfread, North Dakota

Director Judith French, Ohio

Brian Downs as designated representative for Commissioner Glen Mulready, Oklahoma

Acting Commissioner TK Keen, Oregon

Shannen Logue as a designated representative for Commissioner Michael Humphreys, Pennsylvania

Director Larry Deiter, South Dakota

Jill Kruger, South Dakota

Zachary Crandall as designated representative for Commissioner Carter Lawrence, Tennessee

Commissioner Cassie A. Brown, Texas

Commissioner Jonathan T. Pike, Utah

Commissioner Scott A. White, Virginia

Commissioner Kaj Samsom, Vermont

Todd Loveshin as a designated representative for Commissioner Patricia Kuderer, Washington

Commissioner Nathan Houdek, Wisconsin

Commissioner Jeff Rude, Wyoming

Legislative Committee:

Representative Ellen Hefner, Oklahoma
Representative David LaBeouf, Massachusetts
Representative Matt Lehman, Indiana
Representative Brian Patrick Kennedy, Rhode Island

Consumer Advisory Committee:

Laura Arp, Arp Insurance Law, LLC
Brendan Bridgeland, Center for Insurance Research
Deborah Darcy, American Kidney Fund
Anna Howard, Cancer Action Network
Dick Weber, Life Insurance Consumer Advocacy Center (LICAC)

Industry Advisory Committee:

Andrew Barron, Lincoln Financial
Ashley Beaudry, Brighthouse Financial
Andrea Davey, Protective Life Insurance Company
Wayne Mehlman, American Council of Life Insurers (ACLI)
Roger Moore, National Association of Insurance and Financial Advisors (NAIFA)
Sarah Wood, Insured Retirement Institute(IRI)
Eric Weinstein, Massachusetts Mutual Life Insurance Company

Insurance Compact Staff in Attendance:

Karen Schutter, Executive Director
Becky McElduff, Chief of Operations & Chief Counsel
Sara Dubsky, Chief of Staff
Sarah Neil, Communications and Outreach Coordinator
Dan Bradford, Director of Regulatory Affairs
Jenny Sieben, Product Reviewer II

Interested Parties

Carrie Haughawout, ACLI

Director Dunning called to order the meeting of the Commission. Director Dunning began the meeting with the announcement that Commissioner Marie Grant was appointed as Treasurer, continuing Maryland's service to the Compact.

Director Dunning asked Ms. Schutter to take a roll call of the Commission, Legislative, Industry Advisory and Consumer Advisory Committees. Ms. Schutter conducted a roll call for the Management Committee, the Commission, the Legislative Committee, the Consumer Advisory Committee, and the Industry Advisory Committee, confirming a quorum for both the Management Committee and the Commission.

Director Dunning moved to the second item on the agenda, welcome and dialogue with the members of the Legislative Committee. Director Dunning announced that the Legislative Committee was invited to participate in the discussion and acknowledged the presence of Indiana Representative Lehman, Rhode Island Speaker ProTem Kennedy, Massachusetts Representative LaBeouf, Oklahoma Representative Hefner, and other committee members joining virtually. The Compact depends on support from state legislators.

Director Dunning expressed appreciation to the members of the Legislative Committee for their dedicated service and active participation. Gratitude was also extended to the NCOIL and NCSL staffs for their valuable support. Director Dunning asked if any of the Legislative Committee members wished to make remarks before proceeding with the meeting agenda. Representative Lehman responded, expressing appreciation for hosting the event and thanking Director Dunning and the Commission. Representative Lehman noted that there are currently challenging issues, and emphasized NCOIL and its lawmakers are committed advocates for the long-term success of the Compact. The participation of Ms. Schutter at NCOIL meetings was recognized for maintaining ongoing dialogue and fostering a productive working relationship between the legislative branches and the Compact. Representative Lehman acknowledged that some complex issues on the horizon may fall outside the Compact's scope but affirmed a continued commitment to collaboration and open communication as these matters arise. The floor was then returned to Director Dunning. Director Dunning thanked Representative Lehman.

Director Dunning thanked both the Consumer Advisory Committee and the Industry Advisory Committee for their service. Director Dunning briefly welcomed Ms. Arp to her first meeting as a new member of the Consumer Advisory Committee.

Director Dunning asked Commissioner McVey to Chair the meeting for agenda items three and four. Director Dunning would like to make comments and have them separated from his role as Chair of the meeting.

Commissioner McVey moved to the third agenda item, Management Committee and Commission consideration of adoption of the new and amended Group Life and Group Annuity Uniform Standards. Commissioner McVey stated that the Product Standards Committee has presented new and revised Uniform Standards for review and possible adoption. These Uniform Standards have been subject to a strict rulemaking schedule and were published for a 60-day notice and comment period beginning in early June. No comments have been received regarding the new Uniform Standards listed on the agenda. ACLI submitted a comment letter pertaining to amendments of three Group Annuity Uniform Standards, specifically proposing their expansion for use by non-employer groups.

Commissioner McVey requested Ms. Schutter to elaborate on these Uniform Standards and the rulemaking process. Ms. Schutter stated that all nine Uniform Standards under review are included in the 2025 Uniform Standards Development Prioritization List. Of the six new Uniform Standards, each is derived from existing

Uniform Standards. Three Uniform Standards address gaps within Group Life: one concerning Graded Death Benefits, another for Waiver of Premium Benefits applicable to Group Term Life (for which similar standards exist for Group Whole Life), and one Uniform Standard for forms related to changes in annuity contracts and certificates. Additional Uniform Standards have been established for Group Life and Group Annuity plans relating to tax-qualified plan provisions. These standards, already implemented for individual products, offer clarification on form requirements for these provisions. Further, amendments to three current group annuity Uniform Standards are proposed to broaden their applicability beyond employer groups. With these modifications, the Group Annuity Uniform Standards will be fully amended to support non-employer group expansion. The Product Standards Committee began work early in the year, publishing new and amended Uniform Standards for public comment in April. After receiving no feedback, the Compact Office posted these Uniform Standards for an additional 60-day notice period in June. On July 31st, the Management Committee held a conference call to approve this action and conduct a public hearing. ACLI submitted written and oral comments concerning the Group Annuity Uniform Standards, specifically definitions related to employer and non-employer groups. Their concerns address how these definitions affect retirement plans.

Ms. Schutter concluded her report, offering to answer questions. Commissioner McVey invited further remarks, and turned to the ACLI to provide oral comments in addition to their written comments.

Mr. Mehlman stated that ACLI had no comments regarding the new Uniform Standards. Commissioner McVey then asked if there were any comments on the amended standards.

Ms. Haughawout, Senior Vice President for Life and Regulatory Policy at the American Council of Life Insurers, noted that ACLI members identified an issue they felt warranted attention despite its emergence late in the process. The group standards have existed for many years but have been limited to employer groups, defined as either an employer or a trustee of an employer. This definition excludes pooled employer groups previously referenced and presents concerns for annuity carriers issuing group annuities to retirement plans, including those subject to ERISA. While these retirement plans are federally regulated, they often use state-regulated insurance and annuities to fund plan obligations. Ms. Haughawout indicated that the current definition may conflict with ERISA regulations, potentially restricting the ability to offer products filed through the Compact to these employers. ACLI's comment letter aimed to highlight this concern, and Ms. Haughawout expressed gratitude for the committee's willingness to examine the issue, even at the current stage of the process. She apologized for the late submission within the broader comment period but emphasized the importance of raising this matter. She concluded by thanking the committee for the opportunity to comment and offered to address any questions from the members.

Commissioner McVey stated that the Officers have reviewed this letter and believe the comments merit discussion prior to considering a motion to adopt. Commissioner McVey then invited Commission members to share any comments or questions regarding the ACLI's request to consider amendments to the definitions of "employer" and "non-employer group" in these Uniform Standards.

Director Dunning acknowledged that the ACLI raises a valid concern regarding the absence of state law definitions for pooled employer plans and multiple employer plans. He expressed understanding for the concerns raised about whether the group framework established by the Rulemaking Committee in 2021 had fully considered the implications for retirement plans. The proposed amendments clarify that, apart from single

employer groups, all other groups are classified as non-employer groups for annuity issuances. This classification creates issues, as it impacts issuances to single employer, multiple employer, and pooled employer groups. Director Dunning emphasized the importance of the Management Committee addressing this issue directly, as it involves the intersection of state and federal law and requires decision-making at the committee level rather than only by department staff. As chief insurance regulators, the Commission members are charged by statute with representing their states in such matters, especially when challenges arise at this stage of the process. He noted that, while the timing of this discussion is not ideal, it remains an important topic for consideration.

Director Dunning made a motion to adopt six new Uniform Standards and table amendments to the three group annuity Uniform Standards. Director Dunning asked the Compact Office to further brief these issues for the Management Committee to determine if changes or clarifications are needed regarding retirement plans, with a suggestion that the amendments return for consideration within 90 days. Ohio seconded the motion. Director Dwyer expressed support and emphasized the importance of offering diverse options to employers and careful study of the issue. Ms. Seip noted she supports the motion and study of the issue. As no further comments were made, a roll call vote was conducted, and the motion was adopted.

Ms. Schutter explained that the Compact Office will promulgate the six adopted Uniform Standards and they will be effective December 1st. An interim Management Committee call will be planned before the December in-person meeting.

Commissioner McVey moved to the fourth agenda item, the report and recommendation of the Rulemaking Committee and consideration by the Management Committee to approve the report and recommendation. Commissioner McVey asked Ms. Kruger to provide the report. Ms. Kruger reported the Rulemaking Committee recommends amending the Commission's Rule for Adoption, Amendment and Repeal of Rules for the Interstate Insurance Product Regulation Commission (Rulemaking Rule) to quickly address non-controversial changes. The Committee focused on updates to the Compact's Rulemaking Rule, holding several calls for feedback. The goal was to create a faster rulemaking approach, using a direct final rule method from the 2010 Model State Administrative Procedures Act. This allows new rules with broad support to be adopted within 60 days if there are no objections. Ms. Kruger provided an example of how the process would have worked in a previous rulemaking situation. For instance, a modification in the non-forfeiture interest rate reflecting updates to an NAIC model would qualify under this process. After evaluating additional amendments to the rulemaking procedures, the Committee determined that current mechanisms sufficiently address facilitation needs. These tools encompass the issuance of advanced notices of rulemaking, intended to gather preliminary standards through the use of subgroups and to initiate drafting efforts.

Ms. Kruger noted the Committee was tasked with creating written procedures for filers to appeal product filing decisions. After reviewing current procedures, the Committee found them likely adequate: notices and hearings can address appeals of disapprovals, while advisory and interpretive opinions cover challenges without formal disapproval. The Committee sought industry input at the May Roundtable and a July public call but received no feedback. As a result, the Committee recommends publishing the proposed direct final rule amendment for notice and comment, and welcomes further input from the Management Committee regarding these strategic plan items.

Ms. Kruger concluded her report.

Commissioner McVey asked if there were any questions or comments for the Rulemaking Committee. Director Dunning expressed appreciation to Ms. Kruger and acknowledged the Rulemaking Committee's diligent efforts on this matter under South Dakota's leadership. Director Dunning noted that many stakeholders have participated in the roundtable process. It is clear from company feedback that there is concern about the lack of recourse when the Compact Office's interpretation diverges from those of member states, or is perceived to be incorrect. He emphasized that significant discussion among the Officers has highlighted the need for the Compact Office not to serve as the final authority on challenges to its interpretation of adopted Uniform Standards without oversight from the Commission's members.

Referencing earlier comments, Director Dunning reiterated that Commissioners should be involved when the Compact Office's actions on their behalf are contested. He observed that, both in individual states and within the Compact, few insurers pursue filings to the point of denial due to the substantial consequences associated with denials, making such cases rare. This infrequency suggests that current appeal procedures may not be as effective as intended especially for challenging Compact Office interpretations prior to outright disapproval. To address this, Director Dunning has requested the Rulemaking Committee work with the Compact Office to outline steps for managing such appeals, welcoming additional suggestions to enhance these processes. He clarified that an interpretive inquiry could originate from any party, including Member States seeking a secondary opinion on the Compact Office's interpretation. Director Dunning then moved that the Management Committee accept the Rulemaking Committee's report, adopt the recommendation to publish the direct final rule provision for notice and comment, but refer the appeals procedure issue back to the Rulemaking Committee for further development. Commissioner McVey thanked Director Dunning and stated the comments accurately reflect the discussions held among the officers.

Commissioner McVey invited comments on Director Dunning's suggestion. Director Dwyer expressed support, noting that many issues reach the Compact Office without Commissioners' awareness. Roundtable discussions often raise questions about filings that do not meet Uniform Standards. These matters should be brought to the Management Committee and Commissioners, where authority resides. Commissioner McVey thanked Director Dwyer for her input. Commissioner McVey asked for a second to the motion. Commissioner Zimmerman made the motion. Commissioner McVey asked for comments from the Legislative and Rulemaking Committees; hearing none, he proceeded with a voice vote; the motion carried.

Director Dunning moved to the fifth agenda item, report and recommendation of the Adjunct Services Committee and consideration by the Commission to approve the report and recommendation. Director Dunning invited Ms. Richardson to present the Adjunct Services Committee report. Ms. Richardson reported that the Adjunct Services Committee has been focused on revising its framework for the consultative office at the Compact. At the Commission's meeting last November in Denver, there was a valuable discussion regarding the proposed framework's parameters. In the intervening months, the Committee has refined the framework to incorporate feedback from members, stakeholders, and in particular, state legislators. State legislators raised concerns about the potential for this framework to exceed the authority granted to the Commission. In response, the Committee clarified that the service is consultative and advisory in nature, offered voluntarily to states and companies who wish to utilize the Compact's expertise and information-sharing resources. It was further emphasized that eligible products must fall strictly within the Compact's authority, and only states retain the power to approve products presented through the consultative office. The updated framework outlines several benefits for states, companies,

and other stakeholders. These include providing states with access to expert advice from the Compact at no cost; offering companies a centralized venue during pre-filing where states can receive uniform information; enabling states to engage in peer-to-peer questions and discussions; and allowing companies to address multi-state concerns efficiently before proceeding with individual state filings.

This updated framework significantly improves the efficiency of the state review process for both companies and states, facilitating faster market delivery and broader distribution of a uniform product that benefits consumers nationwide. The framework is now referred to as the Consultation Advisory Services Office. The Committee proposes a pilot program to guide select product or benefit features and concepts through the process. This initiative would include products currently not reviewed by the Compact due to nonconformity with Uniform Standards. Eligible products may include those that are on the prioritization list for new Uniform Standards development, those previously identified by the Compact Office as outside current scope, or those being filed in various states using a mix-and-match approach. Feedback at the May Compact Roundtable was positive, and no concerns were raised during the July 24th public call regarding the finalized draft framework. The Legislative Committee also reviewed this framework prior to last month's NCOIL meeting. The Committee, in collaboration with the Compact Office, will assess the viability of the framework through a pilot program commencing on or after September 1, 2025, with the aim to present final recommendations at the annual meeting in December. Appreciation is extended to all involved parties particularly state legislators, consumer representatives, company representatives, and regulators for their commitment and constructive contributions throughout this collaborative process.

Ms. Richardson concluded her report.

Director Dunning asked if there were comments. Representative Lehman thanked the Commission for their progress. He noted previous concerns about the innovation office but expressed optimism about the new Consultation Advisory Services Office and looks forward to continued collaboration. Director Dunning thanked Representative Lehman for his remarks. Director Dunning stated that seeing no other questions or comments and as this is a report, a vote is not required.

Director Dunning noted that this is another example of ideas generated through the Compact roundtable process, which has been useful in several cases. The Compact will hold another roundtable on November 5th in Omaha in conjunction with the Insurtech on the Silicon Prairie event, taking place November 3rd and November 4th in Omaha, Nebraska. The Insurtech event will feature a diverse group of speakers, including Director Dwyer. Attention was also drawn to the Compact's Value of Services Report available at the table. The report outlines the value to member states, provided at no charge and in a revenue neutral manner to the states, of the services including thorough and qualified reviews of insurance products, supporting effective and efficient regulatory practices.

Director Dunning moved to the sixth agenda item, Consent Agenda. Director Dunning stated this is to adopt the consent agenda items. The items on the consent agenda include the minutes from the joint meeting of the Commission and Management Committee which took place on April 1st, as well as the Management Committee call on July 31st, and the reports of the Product Standards and Finance Committees. Director Dunning asked for a motion and a second by a member of the Management Committee to adopt the consent agenda items. West

Virginia made the motion and Texas seconded. A voice vote of the full Commission was conducted; the motion carried.

Director Dunning moved to the seventh agenda item, the Executive Director's Operational Report. Ms. Schutter reported the Compact roundtable is scheduled for the morning of November 5th. A save-the-date will be sent soon.

On July 7th, the Compact Office made several staff changes. Dan Bradford joins as the new Director of Regulatory Affairs, leading a team focused on committee support, communications, and training. Team members Sarah Neil (Rhode Island), Sue Ezalarab (Wisconsin), and Cara Shackelford (North Carolina) are all former regulators. Ms. Schutter reported there were other staff promotions including Sara Dubsky to Chief of Staff, Becky McElduff to Chief of Operations and Chief Counsel, and Karen Givens to Director of Product Operations. The Compact Office remains committed to responsive and service-oriented support for all stakeholders.

Ms. Schutter concluded her report.

Director Dunning asked if there were any questions for Ms. Schutter; seeing none, he thanked her for the report.

Director Dunning noted that before addressing additional matters, there are extension requests from two member states regarding their opt out stays. Oregon has requested a six-month extension, and North Dakota seeks a stay until May 1, 2026. The discussion will begin with Oregon's request, with Ms. Schutter providing background on Oregon's opt out. Ms. Schutter reported that Oregon gave timely notice last year of its intent to opt out by regulation from the ILVA or RILA Uniform Standards and a benefit feature Uniform Standard. Oregon initially requested a six-month stay, which was extended for another six months in February, and is now seeking a further extension as the current stay expires today. Oregon requires more time to complete state procedures. Although the statute specifies 90-day stays, regulatory processes often take longer, and six-month or year-long stays are common. Oregon's extension request letter is available on the event calendar; and no comments were provided.

Director Dunning thanked Ms. Schutter for the report and noted that the administrative rules process can be lengthy. Director Dunning requested a motion and a second from Commission members to approve a six-month extension of the Oregon stay, specifically for the Uniform Standards for Individual Deferred Index Linked Variable Annuities, and the amended Additional Standard for Market Value Adjustment features for Modified Guaranteed Annuities. Commissioner Clark made the motion, and Commissioner Pike seconded. Director Dunning asked for questions or comments from the Commission, legislative committee, and advisory committees; none were raised. With no abstentions, the motion was adopted.

Director Dunning addressed North Dakota's request, with Ms. Schutter reporting that after joining the Compact in August 2023, North Dakota requested a stay of the Disability Income Uniform Standards to consider an opt out. Their current extension request is to move the deadline from May 1, 2025, to May 1, 2026, allowing additional time for internal review and work with the Compact Office on their concerns. The letter regarding this request is posted on the events calendar. North Dakota acknowledged they meet many Uniform Standards but need more time to address outstanding issues before deciding on an opt out or proposing changes to the Commission. Director Dunning requested a motion and a second from Commission members to approve a stay effective from May 1, 2025, to May 1, 2026, for the Individual and Group Disability Income Insurance Uniform Standards. The purpose is to allow North Dakota time to work with the Compact Office on developing a solution to present to the

Commission for consideration. Director Deiter made the motion, and Ms. Logue seconded. Director Dunning requested questions or comments from the Commission, Legislative Committee, or Advisory Committees. With none raised and no abstentions, the motion passed.

Before adjourning, Director Dunning asked if there were any other matters for discussion. Arizona expressed gratitude to the Compact staff for their assistance in drafting legislation that allows the state to rejoin the Compact for Long Term Care products, which was recently passed by legislators. Director Dunning thanked Arizona for the update and, seeing no further comments, moved for a motion to adjourn the meeting. Director Deiter presented the motion, which was duly seconded by Acting Commissioner Keen.

Director Dunning concluded the meeting of the Commission.



**MEETING OF THE MANAGEMENT COMMITTEE OF THE
INTERSTATE INSURANCE PRODUCT REGULATION COMMISSION**

**Tuesday, December 2, 2025
3 pm ET / 2 pm CT / 1 pm MT / 12 pm PT**

AGENDA

1. **Roll Call**
2. **Discussion of ACLI Comment Letter and Compact Office Memorandum regarding the Proposed Amendments to the Group Annuity Uniform Standards:** The Management Committee will receive comments on and discuss both the ACLI comment letter and the Compact Office memo.

EXPLANATION: At the August in-person meeting, the Management Committee requested the Compact Office brief the issues raised in the American Council of Life Insurers (ACLI) comment letter regarding the proposed amendments to the Group Annuity Certificate Uniform Standards, Uniform Standards for Group Guaranteed Interest Contracts for Non-Variable Annuities, and Group Fixed Annuity Contract Uniform Standards. The Commission is expected to consider for adoption these amendments during the December 10th in-person meeting.
3. **Public Hearing on the Proposed Amendments to the Rule for Adoption, Amendment and Repeal of Rules of the Interstate Insurance Product Regulation Commission:** Conduct a public hearing to receive oral comments on the amendments proposed to the Rulemaking published for public comment on August 27th, 2025.

EXPLANATION: At the August in-person meeting, the Management Committee initiated the rulemaking process to consider the Rulemaking Committee recommendation to amend the *Rulemaking Rule* to add a provision titled “Direct Final Rule” to accelerate the rulemaking process for non-controversial new and amended rules. Written comments were due on October 27th and no comments were received. The Management Committee will hold a public hearing to receive oral comments. The Commission is expected to consider for adoption this amendment during the December 10th in-person meeting.
4. **Public Hearing on the Proposed 2026 Annual Budget and the Proposed 2026 Uniform Standards Development Prioritization List:** Conduct a public hearing to receive oral comments on the 2026 annual budget package as recommended by the Finance Committee and the 2026 Uniform Standards Development Prioritization List as recommended by the Product Standards Committee.

EXPLANATION: Upon receipt of the recommendations from the Finance Committee and Product Standards Committee, respectively, Director Dunning as Compact Chair pursuant to Article IV, Section 2(a) of the Bylaws authorized that each recommendation be published for public notice in advance of the December 2nd meeting. The Management Committee will consider a motion to ratify this action and will

hold a public hearing to receive comments from members and any interested parties on these items. The Commission is expected to consider these items for adoption during the December 10th in-person meeting.

- 2026 Annual Budget as published on November 10th
- 2026 Budget Memo as published on November 10th
- 2026 Schedule of Fees as published on November 10th
- 2026 Uniform Standards Development Prioritization Recommendation as published on November 10th

5. Management Committee Consideration of Appointments to the Industry Advisory

Explanation: The action item is to consider the recommendation of the Compact Officers for appointments to four expiring seats on the Industry Advisory Committee. A more detailed memo will be sent to Management Committee members in advance of the meeting

6. Any Other Matters & Adjourn

Members of the Management Committee and Department Staff in Attendance:

Director Eric Dunning, Chair, Nebraska

Commissioner Allan McVey, Vice Chair, West Virginia

Commissioner Marie Grant, Treasurer, Maryland

Lori Munn as a designated representative for Interim Director Maria Ailor, Arizona

Director Ann Gillespie, Illinois

Sheri Cullen as designated representative for Acting Commissioner Michael Caljouw, Massachusetts

Julie Merriman as a designated representative for Director Anita Fox, Michigan

Michael Fahncke as a designated representative for Commissioner Justin Zimmerman, New Jersey

Bobby Croom as a designated representative for Commissioner Mike Causey, North Carolina

Laura Miller as designated representative for Director Judith French, Ohio

Latif Almazan as designated representative for Commissioner Cassie A. Brown, Texas

Mary Ashby Brown as a designated representative for Commissioner Scott White, Virginia

Members of the Commission and Department Staff in Attendance:

Mark Fowler, Alabama

Sarah Bailey, Alaska

Tricia Dave, Connecticut

Jessica Luff, Delaware

Karla Padilla-Rodas, Georgia

Shannon Hohl, Idaho

Kasey Lytell, Louisiana

Tim Schott, Maine

Candace Gergen, Minnesota

Bob Williams, Mississippi

Jo LeDuc, Missouri

Erin Snyder, Montana

Maggie Reinert, Nebraska

Victoria Fowler, New Hampshire

Dianne Simmons, New Mexico

John Arnold, North Dakota

Joshua Blakely, Oregon

Matt Gendron, Rhode Island

Jill Kruger, South Dakota

Legislative Committee:

Representative James Dunnigan, Utah

Delegate Dean Jeffries, West Virginia

Representative David LeBoeuf, Massachusetts

Consumer Advisory Committee:

Laura Arp

Industry Advisory Committee:

Amanda Herrington, AHIP

Wayne Mehlman, ACLI

Sarah Wood, IRI

Insurance Compact Staff in Attendance:

Karen Schutter, Executive Director

Becky McElduff, Chief of Operations & Chief Counsel

Sara Dubsky, Chief of Staff

Dan Bradford, Director of Regulatory Affairs & Counsel

Joe Bonfitto, Product Reviewer II

Mindy Bradford, Senior Product Reviewer and Trainer

Sue Ezalarab, Regulatory Consultant

Karen Givens, Assistant Director of Product Review Operations

Aimee Lawson, Product Review

Sarah Neil, Communications and Outreach Coordinator

Cara Shackelford, Regulatory Research Specialist

Director Dunning called to order the joint virtual meeting of the Management Committee. Ms. Schutter took the roll call of the Management Committee, the members of the Commission, Legislative Committee, and Industry and Consumer Advisory Committees.

Director Dunning proceeded to the next item on the agenda, discussion of ACLI comment letter and Compact Office memorandum regarding the proposed amendments to the Group Annuity Uniform Standards. Director Dunning reported the ACLI brought comments to the Management Committee during the August in-person meeting about the proposed amendments to the Group Annuity Standards. Director Dunning asked Ms. Schutter to provide a summary of the concerns raised by the ACLI and the process. Ms. Schutter noted the ACLI brought comments to the Management Committee pertaining to the term “non-employer group” and its relationship to “pooled employer plans” and “multiple employer plans”. Ms. Schutter noted the in response to the request from the Management Committee, the Compact Office prepared a briefing memo to explain the non-employer group framework, the types of retirement plans under ERISA and suggested language to clarify the language in the proposed amendments. Ms. Schutter reported that the ACLI submitted written comments dated November 20th indicating the proposed amendments were satisfactory and addressed the concerns raised.

Director Dunning asked if there were any comments or questions about the briefing Ms. Schutter had provided. Hearing none, Director Dunning asked ACLI if there were any additional comments. Mr. Mehlman noted the ACLI appreciated the flexibility the Management Committee provided and the proposed amendments addressed the concerns raised. Director Dunning asked if there were any other comments or questions. There were none.

Director Dunning turned to the next item on the agenda, the public hearing on the proposed amendments to the Compact’s Rulemaking Rule. Director Dunning asked Ms. Schutter to provide a summary pertaining to the proposed amendments to the Rule for Adoption, Amendment and Repeal of Rules of the Interstate Insurance Product Regulation Commission. Ms. Schutter noted the Rulemaking Committee published the amendments to the Rulemaking Rule in August for a 60-day comment period. No comments were submitted during the comment period. The amendments to the Rule will add a new Section 110 which will be a provision

for a rulemaking process for noncontroversial new and amended rules. The proposed language is modeled after the Model State Administrative Procedure Act of 1981, specifically Section 310, Direct Final Rule.

Director Dunning asked if there were any comments or questions about the briefing Ms. Schutter had provided. Hearing none, Director Dunning asked if there were any comments. Mr. Blakely asked if the items subject to the Direct Final Rule process would be published on the website. Ms. Schutter responded that the Compact Office would follow current rulemaking procedures for the items subject to the Direct Final Rule process and items would be published to the website for a designated comment period. There were no other comments.

Director Dunning proceeded to the next item on the agenda, the public hearing on the proposed 2026 annual budget and the 2026 Uniform Standards Prioritization Development list. Ms. Schutter provided an overview of the current financials and the proposed 2026 budget. It was noted that there would be no increase to the Schedule of Fees for 2026. Two additional resources were being recommended with the budget for 2026. Director Dunning asked if there were any questions or comments. Hearing none, Director Dunning asked Ms. Block to provide a report on the development of the Uniform Standards Development Prioritization list for 2026.

Ms. Block reported that Uniform Standards prioritization is an annual process open to anyone to request a new or amended standard. Ms. Block noted there were eight requests for new or amended standards in addition to requests carried over from 2025. The Product Standards Committee made the recommendation to the Management Committee in early November. The Commission will then consider final action during the annual meeting. Director Dunning asked if there were any questions or comments for Ms. Block.

Hearing none, Director Dunning asked if there were any questions or comments pertaining to these two items. Hearing no comments, Director Dunning closed the public hearing for the annual budget and the Uniform Standards Development Prioritization list.

Director Dunning proceeded to the next item on the Agenda, the Management Committee's consideration of the appointments to the Industry Advisory Committee. Per the Bylaws, the Industry Advisory Committee has eight seats with alternating two-year terms. This year, there are four seats open for appointment. They are three seats for industry trade representatives and one seat for a company trade representative. The Compact Officers are recommending the three industry trade representative seats be filled by Wayne Mehlman with ACLI, Amanda Herrington with AHIP, and Roger Moore with NAIFA. The fourth seat would be filled by Peter Diggins with The Guardian Life Insurance Company of America. Director Dunning thanked Ms. Davey with Protective Life Insurance for her tenure on the Industry Advisory Committee for the past four years. There were no comments or questions. Commissioner McVey made a motion to appoint the named representatives to the Industry Advisory Committee. Commissioner Grant seconded the motion. The motion was carried by voice vote.

Director Dunning reminded all in attendance about the Compact's upcoming meetings in Florida tied to the NAIC Fall National Meeting. Hearing no other matters, Director Dunning asked for a motion to adjourn the meeting. Commissioner McVey made the motion, and Commissioner Grant seconded the motion to adjourn.



MEMORANDUM

TO: Members of the Interstate Insurance Product Regulation Commission

FROM: Commissioner Marie Grant, Treasurer

DATE: December 10, 2025

SUBJECT: **Report of the Insurance Compact Treasurer (*As of October 31, 2025)**

- To date, the Insurance Compact has collected a total of \$6,268,215 in both Compact fees and state filing fees in 2025.
- Of this total amount, the Insurance Compact received \$3,635,215 in its self-generated revenue since January 1, 2025. This amount is 36% over 2024 actuals. Actual 2025 revenues year-to-date are approximately \$346,677 or 9.09% below the 2025 budget. More specifically, the Insurance Compact has earned:
 - \$2,062,783 in Compact Per Filing Fees – 2,887 products have been submitted.
 - \$1,526,250 in Annual Registration Fees – 285 companies have registered.
- The Compact adopted a new filing fee for forms submitted which has generated approximately \$597,000 more in revenue as a result. The Compact has limited the number of filings in the expedited review program queue due to workload and staffing which is the primary reason for the revenue variance.
- The remainder of the fees collected by the Insurance Compact represents state filing fees of \$2,633,000, which are remitted directly to the Member States. This is 20% over the amount as of October 31, 2024.
- The Insurance Compact is currently operating approximately 13.6% or \$458,224 under budgeted expenses. Actuals related to salaries, travel and expenses related to meetings are the drivers of the expense savings. There has been an opening since May due to attrition.
- The Insurance Compact has a change in net assets of \$718,905, which is approximately \$93,547 over the budgeted change in net assets. The Insurance Compact has a cash balance of \$935,186, which is \$99,558 over the cash balance as of October 31, 2024.
- The Compact made its fifth annual payment to the NAIC under the restructured debt arrangement. Under this 2020 agreement, repayment will be made on the principal balance of \$2,740,134 in ten equal annual installments. If the organization's cash balance is less than \$250,000 as reflected in the annual audited financial statements, the required repayment for the following year will be deferred and the repayment period extended accordingly. Upon the final payment on the principal, the accrued interest of \$712,733 will be treated as a contribution to the Commission. The current balance of the outstanding debt to the NAIC as of October 31st is \$1,534,776.
- The Insurance Compact Office monitors the performance of its revenues to budget and keeps the Officers, Management Committee, and Finance & Audit Committees regularly informed of its financial condition.

INTERSTATE INSURANCE PRODUCT REGULATION COMMISSION (INSURANCE COMPACT)

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