



**TO: Insurance Compact Management Committee**

**FROM: Insurance Compact Rulemaking Committee**

**DATE: March 24, 2026**

**SUBJECT: Proposed Recommendation to Establish an Intermediate Review Process for Use During the Compact Product Filing Process.**

At the 2025 summer in-person meeting, the Management Committee requested the Rulemaking Committee develop a procedure for filers to use to request a second-level of review of the Compact Office interpretation of Uniform Standards from a body of Compacting States during the Compact Office review of a product filing.

The Rulemaking Committee brings forward a recommendation to establish an operating procedure for an intermediate review process for during the Compact product filing process. This process occurs when a filer requests intermediate review of the Compact Office application of the Uniform Standards or Operating Procedures during the review of a product filing submission. The insurance company 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 existing Operating Procedures do not contemplate the use of an appeals process until after final disposition of a filing submitted to the Compact for review. This proposal provides a new course of action by which a filer may obtain a second, authoritative opinion regarding interpretation of the Uniform Standards used to review the insurance company's product during Compact review.

The Rulemaking Committee held three member-only calls during which the members asked questions about the process and the effects of the decisions of the review board.

On January 14, 2026, the Rulemaking Committee received an email from ACLI asking several questions about the timing and details of the process. These questions were discussed by the Rulemaking Committee during its public call on January 21. As a result, the Compact Office made two clarifications; one to specify electronic means of transmitting a request for intermediate review, and the other to permit additional information to be provided after a member review report is issued only in the event of exigent or extraordinary circumstances.

The revised draft of the Intermediate Review Process is hereby recommended to the Management Committee for further notice and comment.

