

2027 UNIFORM STANDARD IDENTIFICATION REQUESTS LOG

This document provides a listing of identification requests submitted for 2027. Each request is assigned a unique identification number for reference. Entries are presented in no particular order and do not indicate prioritization, status, or Commission action.



USIR-2027-001: Deletion of Age-Based Waiver of Premium Provision in Disability Standards

Name of Person Requesting Change: American Council of Life Insurers (ACLI)

Affiliation: Industry Advisory Committee

Contact Email: waynemehlman@accli.com

Contact Phone Number: 202-624-2135

Request for: Amendment to Existing Standard

Section and subsection(s) of Uniform Standard if applicable: Subsection 3.A.(1)(e) of the Additional Standards for Waiver of Premium Benefits for Total Disability and Other Qualifying Events (IIPRC-L-08-LB-I-WPB), which reads as follows:

(e) The form may base the type of waiver benefit available on the insured's age on the date disability begins, but shall not do so on terms less favorable than the following:

(i) If the insured's total disability begins before the benefit anniversary on which the insured attains age 60, the form shall state that the company shall waive all premiums due for the insured under the policy for the period that the insured continues to be totally disabled. If such period extends to the benefit anniversary on which the insured attains age 65, the form shall state that the company shall waive all further premiums due for the insured under the policy; and

(ii) If the insured's total disability begins after the benefit anniversary on which the insured attains the age specified in item (i) for when total disability begins, the form shall state that the company shall waive all premiums due for the insured under the policy for the period that the insured continues to be totally disabled, but only up to the benefit anniversary on which the insured attains age 65;

Detailed description of the request, including the scope if a new Uniform Standard, and if appropriate also include proposed language for consideration: We request that Subsection 3.A.(1)(e) be deleted.

Detailed explanation of the reason for the request. If a new Uniform Standard, please provide support that this type of product has been filed and approved in Compacting States: If an amendment to an existing Uniform Standards, please provide support for how circumstances or underlying assumptions (whether in regulation, in the marketplace or otherwise) have changed. Subsection 3.A.(1)(e) should be deleted since it is not included in the uniform standards for either individual or group term disability income insurance policies. The practical effect of this subsection is that the cost to consumers to add a rider for the waiver of premium benefits (especially for term products) is quite high for older issue ages. Presumably, at age 65 many policyholders would begin receiving government benefits that could cover their insurance needs if it still remains. We, therefore, request that this subsection be deleted to allow for the rider to terminate at age 65 regardless of when the disability begins.

Is this change currently accepted in Compact states? Unknown

Would this change conflict with any NAIC Model laws or regulations? Unknown



USIR-2027-002: Addition of Repayment Plan Options to Waiver of Premium Standards

Name of Person Requesting Change: American Council of Life Insurers (ACLI)

Affiliation: Industry Advisory Committee

Contact Email: waynemehlman@acli.com

Contact Phone Number: 202-624-2135

Request for: Amendment to Existing Standard

Section and subsection(s) of Uniform Standard if applicable:

- * 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 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

Detailed description of the request, including the scope if a new Uniform Standard, and if appropriate also include proposed language for consideration: 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 policies and desire reinstatement.

Detailed explanation of the reason for the request. If a new Uniform Standard, please provide support that this type of product has been filed and approved in Compacting States. If an amendment to an existing Uniform Standards, please provide support for how circumstances or underlying

assumptions (whether in regulation, in the marketplace or otherwise) have changed. 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.

Is this change currently accepted in Compact states? Unknown

Would this change conflict with any NAIC Model laws or regulations? Unknown



USIR-2027-003: Establishment of a New Standard for In-Plan Lifetime Income Benefits (GLWB-Type Design)

Name of Person Requesting Change: Kimberly Martin

Affiliation: Other Interested Party

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Contact Phone Number: (336) 691-3064

Request for: New Standard

Detailed description of the request, including the scope if a new Uniform Standard, and if appropriate also include proposed language for consideration: The Company proposes the adoption of a new Uniform Standard to accommodate an innovative in-plan lifetime income benefit available under group fixed and variable annuity contracts.

This benefit is designed to provide lifetime retirement income protection for plan participants through a structured withdrawal and insurance framework. The benefit operates as a guaranteed lifetime withdrawal benefit (GLWB)-type design, with a distinct payment structure in which the source of payments transitions from participant account value to insurer payments upon depletion, rather than initiating annuitization.

Benefit Structure (Three-Phase Design)

The proposed benefit operates through three sequential phases:

Phase 1 – Accumulation Phase (Pre-Retirement)

Participants make contributions through an employer-sponsored retirement plan.

Contributions are invested in:

Fixed options supported by the insurer's general account; and/or
Variable investment options (where applicable).

The participant's account value grows based on contributions and investment performance.
An income base is established and may grow during this phase, in accordance with contract terms.

Key Feature:

Income Base is accumulated and established. No income guarantee or insurance payments are provided during this phase.

Phase 2 – Withdrawal Phase (Participant-Funded Income)

At retirement (or election of income), the participant begins taking withdrawals.
Withdrawals are paid from the participant's account value.
The participant continues withdrawals until their account value is fully exhausted.

Key Features:

The insurance component of the benefit does not provide payments during this phase

Phase 3 – Lifetime Income Phase (Post-Depletion Insurance Payments)

Once the participant's account value reaches zero the insurance guarantee is triggered.
The insurer begins making guaranteed lifetime income payments.

Key Features:

Payments continue for the life of the participant (or joint lives, if applicable)
The amount of lifetime income is based on a percentage of the income base (i.e., a locked-in income base)

4. Distinguishing Characteristics

This benefit includes the following distinguishing features:

A. Not a Traditional Annuitization

- Payments are not initiated through a formal annuitization election
- The guarantee is triggered automatically upon depletion of account value

B. GLWB-Based Structure with Modified Payment Source

Withdrawals can be taken once the guarantee is triggered.
No insurer payments during the withdrawal phase
Insurance payments begins only after depletion

C. Distinct Risk Structure

Participant bears investment risk in phase 1 and income base is established before withdrawal starts in Phase 2
Insurance guarantee starts when withdrawals begin and Insurer assumes longevity risk in Phase 3.

Detailed explanation of the reason for the request. If a new Uniform Standard, please provide support that this type of product has been filed and approved in Compacting States. If an amendment to an existing Uniform Standards, please provide support for how circumstances or underlying assumptions (whether in regulation, in the marketplace or otherwise) have changed.

This new Uniform Standard is necessary to support modern in-plan retirement income solutions that are increasingly being developed and implemented in the marketplace.

Rationale:

Emerging Product Design

This structure reflects newer in-plan income solutions that:

Provide lifetime income without annuitization

Align with participant demand for liquidity and flexibility

Regulatory Gap

Existing Uniform Standards do not clearly address:

Income-base-driven benefits in group annuities

Payment structures where insurer obligations are contingent on account depletion

Market Adoption

Similar GLWB-type income benefit structures have been:

Filed and approved in multiple states for both individual and group annuities

Used in retirement plan markets as accumulation-to-income solutions

Consumer Benefit

Provides participants with:

Predictable lifetime income

Continued access to account value

Protection against longevity risk

Consistency Across Compact States

Adoption of a Uniform Standard would:

Promote regulatory consistency

Reduce filing complexity

Support innovation in retirement income solutions

Is this change currently accepted in Compact states? Accepted in Most Compact Member States

If accepted in the majority of Compact states, indicate states that do not permit this provision:

Variations exist by state, particularly in jurisdictions with more prescriptive requirements (e.g., New York), though similar structures are generally permitted subject to state-specific filing requirements.

Would this change conflict with any NAIC Model laws or regulations? No