



EXPEDITED REVIEW PROCESS OVERVIEW

Revised Effective July 7, 2025

Expedited Filing Review Program

The expedited review process allows companies to file on an expedited basis where time requirements for review are shorter than what is required for a non-expedited review. This review process will not sacrifice a detailed, quality review or diminish compliance requirements with the applicable Uniform Standards. The parameters for the companies and filings eligible for expedited review are intended to promote filings that are submitted in substantially compliant form and suited for rapid review. The parameters for the companies and filings eligible for expedited review are intended to promote filings that are submitted in substantially compliant form and suitable for rapid review.

The fee for expedited review is double the applicable Compact filing fee. State filing fees remain the same and are not subject to being doubled.

Filings must be authorized by the Insurance Compact Office for expedited review.

The Insurance Compact Office reserves the right to decline to perform an expedited review after it has given prior authorization to a filing company for any reason.

The Insurance Compact Office goals and service levels apply to product filings in the expedited review queue from the date the SERFF status reflects “Ready for Expedited Primary Review.” “Ready for Expedited Primary Review” means that all filing fees and intake compliance issues have been satisfied in order that form, and actuarial review can commence.

Eligible Filing Companies:

Generally, to be eligible to file for expedite review, the Insurance Compact Office will consider the following criteria:

1. Company must be registered;
2. Submitted at least two filings in each of the past three consecutive years;
3. Submitted at least one Compact-approved filing under the same Type of Insurance (TOI) as the expedited filing; and,

The Insurance Compact Office will base eligibility at the Company Code (CoCode) level. Eligibility will be determined at the time that the company requests an expedited review. The Insurance Compact reserves the right to waive one or more of the eligibility criteria if the filer meets the other eligibility

criteria. If the filer or consultant on behalf of the filer is uncertain that the company meets the criteria, it should contact the Insurance Compact Office.

Eligible Product Filings

Individual life insurance, individual annuity (except for ILVA) product filings, and group annuity product filings, along with long-term care advertising filings are eligible for expedited review. All other long-term care insurance, disability income insurance, and group life insurance product filings are not eligible for expedited review.

For individual life insurance and individual and group annuity product filings:

Any TOI in the allowed product lines can be utilized. Any Filing Type, including Supporting Documentation Update, may be utilized.

If documents are provided under the Form Schedule, all form types will be accepted – application, policy/contract, rider, endorsement, amendment, and/or specifications pages.

Eligible product filings for expedited review will have the following limitation:

1. No more than five (5) forms on the Form Schedule unless all forms in the filing are subject only to Uniform Standards for applications;

For long-term care advertising filings:

Either TOI in the allowed product line can be utilized. Only the Advertising Filing Type may be utilized.

Eligible product filings for expedited review will have the following limitation:

1. No more than four (4) forms on the Form Schedule;

Expedited Review Queue

A company must receive written acceptance from the Insurance Compact Office to enter the expedited review queue. There is no longer a specific limit on the number of filings per product line in the expedited review queue. The Insurance Compact Office dedicates sufficient resources to manage the expedited review queue across all product lines, enabling a single expedited review queue and, when necessary, a single waitlist. A company may have more than one (1) filing at a time in the expedited review queue and may submit a request for expedited review while another of the company's filings is in the waitlist and/or expedited review queue. There is no limit on the number of filings a company may have pending in the expedited review queue or waitlist at any time.

At any time, the Insurance Compact Office may have a waitlist for the expedited review queue. If a waitlist exists, the Insurance Compact Office will publish and keep updated on its website the number of companies on the waitlist. The identity of the companies on the waitlist will not be published. The

waitlist for expedited review will be based on a first-come, first-serve basis, based on the date and time (CT) of the company's expedited review email request.

When an opening in the queue becomes available, the Insurance Compact Office will notify the next filer on the waitlist of availability in the queue. If the company declines to enter the queue or does not submit the filing or the expedited Compact filing fee by the end of the first (1st) full business day after being notified, the next filer on the waitlist will be offered the spot in the queue. If the slot is reopened to another company, the filer will be offered the next available slot and must submit its filing and applicable fees by the end of the first (1st) full business day after being notified. If a company does not comply with the time requirements for an expedited submission after two opportunities, it must submit a new expedited review request if the company wishes for the filing to continue to be considered for expedited review.

A company that has submitted its filing and is on the expedited review queue waitlist will remain in the regular review queue process while preserving its place on the expedited waitlist. No expedited fee shall be paid until such time it is notified. If the product filing is still pending initial primary form and/or initial actuarial review when the company is next on the waitlist to enter the expedited review queue, it will be given the option to pay the additional fees associated with the expedited review and enter the expedited review queue.

All requests or inquiries with respect to the expedited review queue should be sent to expedited@insurancecompact.org. Requests should each carry a unique subject line for tracking purposes, referring to the date of the request or SERFF Tracking Number of the filing, for example. Alisha Williams, Intake Coordinator, will be the primary point of contact for the expedited review queue process.

Regular Queue for Product Filings

At all times, the Insurance Compact Office will ensure it is adequately resourced to manage an expedited review process and meet its turnaround-time obligations to all filers under the Product Filing Rule.

Product filings that are not in the active expedited review queue will remain in the normal queue process and handled on a first-come, first-serve manner, with the desired goal of performing an initial primary form review within thirty (30) business days of the product filing being marked "Ready for Primary Review," which may be less or greater than thirty (30) business days, depending on filing volumes. The SERFF status "Ready for Primary Review" means that all filing fees and intake objections have been satisfied in order that form and actuarial review can commence.

Filers are strongly encouraged to disclose their realistic internal deadline or goal for a desired disposition date, provided it is at least sixty (60) days or more after submission for filings that are not within the expedited review process.

As a matter of prudence, all filers are strongly encouraged to plan and submit their filing to the Insurance Compact Office well in advance of their internal deadlines, preferably at least ninety (90) and no fewer than sixty (60) days, in order to allow time to work through unforeseen issues in the compliance review.



INSTRUCTIONS FOR USING EXPEDITED REVIEW PROCESS

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Submitting a Request for Expedited Review:

A company must receive written acceptance from the Insurance Compact Office to enter the expedited review queue.

For a product filing to be considered for expedited review, a company must submit an e-mail to expedited@insurancecompact.org with a specific request to be in the expedited review queue. The specific email request must include the following information:

1. Filing company name or names with its CoCode
2. Applicable TOI for the filing
3. Number and type of forms in the filing
4. List of Uniform Standards used for this filing
5. SERFF tracking information if the filing has already been submitted in the regular queue or there is a draft under construction
6. Identification by name of third-party filer or consultant service, if any
7. Identification by SERFF tracking number of the last 3 approved Compact filings in the applicable TOI being used for the expedited filing. If fewer than 3 approved Compact filings in the applicable TOI, identify up to 3 approved filings in comparable TOI within the last 2 years.
8. Unique Subject Line on the request email with the SERFF Tracking No. (i.e., *Expedited Review Request SERFF Tracking No.*)

The following is an example of an expedited review email request:

To: expedited@insurancecompact.org

Subject: Expedited Review Request – #ABCL-555555555

We are requesting expedited review for ABC Life Insurance Company (CoCode #xxxxx) under TOI L071 Individual Life-Whole. The filing will contain 4 forms consisting of one individual life application, one single premium whole life policy, one specification page and one accelerated death benefit for terminal illness rider. The Uniform Standards used for this filing are as follows:

IIPRC-L-I-APP

IIPRC-L-04-I

The last three approved Compact filings in TOI LO7I are:

ABCL-12345

ABCL-67890

ABCL-09876

If the request is approved, the companies will be put into the queue on a first-come, first-serve basis based on the date and time (CST) of the e-mail request, and the company will be notified via e-mail that the request was approved.

Note: The Expedited Review fee should not be submitted until the Compact has specifically informed the filer that the Expedited Review fee is due.

A company will have one (1) business day after the date it receives written authorization to submit the product filing and expedited Compact filing fee. If the filing and/or fees are not submitted at the end of the first (1st) full business day after the date of written authorization, the Insurance Compact Office will reopen the slot to another company requesting expedited review. If the slot is reopened to another company, a company will be offered the next available slot and must submit its filing and applicable fees by the end of the first (1st) full business day after being notified. If a company does not comply with the time requirements for an expedited submission after two opportunities, it must submit a new expedited review request if the company wishes for the filing to continue to be considered for expedited review.

The Expedited Review Process and Service Levels:

Upon satisfying expedited review filing fees and intake objections, the SERFF status on the filing will be changed to “Ready for Expedited Primary Review.”

Generally, the initial primary form review will be completed by the end of five (5) business days after the date the filing is marked “Ready for Expedited Primary Review” with primary actuarial review (if applicable) completed by the end of five (5) business days after the date the filing is marked “Pending Expedited Actuarial Review.” For filings containing universal life forms, including indexed universal life and variable universal life as well as filings containing annuity guaranteed living benefit forms, actuarial review will be completed within ten (10) business days after the date the filing is marked “Ready for Expedited Actuarial Review”.

Companies must respond to all Insurance Compact compliance issues by the end of three (3) business days after the date the compliance issues are submitted. Failure of the company to respond by the end of three (3) business days after receiving a compliance issue will extend the time for the Insurance Compact Office to review and respond to the company’s response to ten (10) business days. Compliance issues sent after 5:00 p.m. CST will be considered “received” on the following business day.

All company responses to compliance issues will be reviewed by the Insurance Compact by the end of three (3) business days after the date the response is received unless extended to 10 days as noted above. Compliance issue responses received later than 5:00 p.m. CST will be considered “received” on the following business day.

The Insurance Compact Office reserves the right to extend its time goals and service levels and/or removal of the filing from the expedited review queue if the product filing submission or responses to objections are not substantially compliant with the applicable Uniform Standards.

If a filing is removed from the expedited review queue due to compliance issues, expedited filing fees will not be returned or credited. If a specific filing that entered the active expedited review queue is removed from the expedited review queue by the Compact, the company will not be able to request expedited review on future filings until after the company has received approval on two (2) Compact filings after the date of expedited review removal.

If the Insurance Compact removes a pending filing from the expedited review process, the pending filing will enter the regular queue and will retain the original date it was marked “Ready for Primary Expedited Review.”