



*States, Strength & Speed Aligned*

## MEMORANDUM

**TO: IIPRC Management Committee**

**FROM: Product Standards Committee**

**DATE: November 20, 2012**

**SUBJECT: Uniform Standards for Group Term Life Insurance Enrollment Forms and Statement of Insurability Forms and Change Form**

---

The Product Standards Committee (“PSC”) of the Interstate Insurance Product Regulation Commission (“IIPRC”) is charged with developing proposed drafts of uniform standards. In carrying out its charge, the PSC has finalized the following proposed uniform standards and recommends the Management Committee initiate the rulemaking procedure<sup>1</sup> with respect to:

- **Uniform Standards for Group Term Life Insurance Enrollment Forms and Statement of Insurability Forms and**
- **Uniform Standards for Group Term Life Insurance Statement of Insurability Change Form.**

The PSC has thoroughly reviewed the recommended drafts, including comparison to the corresponding individual life insurance uniform standards. With regard to the first bullet point, the NAIC National Standards (EX) Working Group developed and transmitted to the PSC initial drafts of the proposed uniform standards as separate uniform standards for enrollment forms and statement of insurability forms. However, the PSC is recommending combining the uniform standards for enrollment forms and statement of insurability forms into one set of uniform standards.

The PSC believes combining the Uniform Standards for Group Term Life Insurance Enrollment Forms and Statement of Insurability Forms as proposed will avoid confusion about the uniform standards applicable to forms used to collect information about group life insurance enrollees. The framework of these proposed uniform standards requires filing and approval of any form where evidence of insurability is required and underwriting questions are included. Enrollment forms meeting the definition in the uniform standards are not required to be filed for prior approval. The uniform standards narrowly define enrollment forms as those used for the sole purposes of requesting census data for the administration of the Policyholder’s plan, authorizing

---

<sup>1</sup> The rulemaking procedure is set forth in the Rule for Adoption, Amendment and Repeal of Rules for the IIPRC.

payroll deduction or both. Forms containing any further information are subject to detailed uniform standards and shall be filed for prior approval.

The PSC added required customary language about mix-and-match and self-certification to both proposed uniform standards. The PSC recommends the proposed uniform standards be available for mix and match to be used in combination with state-approved group life insurance forms in accordance with §111 of the IIPRC Operating Procedure for the Filing and Approval of Product Filings. The PSC recommends product filings submitted under the proposed uniform standards be subject to prior review and approval and not subject to self-certification.

The proposed uniform standards were subject to public participation by written comment and teleconference meetings on August 28. The PSC convened a second round of public participation, which concluded on November 16, for the Uniform Standards for Group Term Life Insurance Enrollment Forms and Statement of Insurability Forms. The PSC received written comments from the Industry Advisory Committee on the Uniform Standards for Group Term Life Insurance Enrollment Forms and Statement of Insurability Forms and implemented most of the suggestions. No written or oral comments were received on the Uniform Standards for Group Term Life Insurance Statement of Insurability Change Form.

The PSC is available to respond to any questions or requests for information to assist the Management Committee during its rulemaking process.