



REQUEST FOR COMMENTS ON FRAMEWORK FOR UNIFORM STANDARDS ON GROUP DISABILITY INCOME PRODUCTS

I. Background

The Interstate Insurance Product Regulation Commission (IIPRC) is authorized to establish reasonable Uniform Standards for group disability income products. In accordance with its authority and applicable procedures, the Commission seeks comments from its Members, Legislative Committee, Consumer Advisory Committee, Industry Advisory Committee, interested regulators, filers, interested parties and the public about the framework, scope and definitions that should be used in the development of group disability income Uniform Standards.

Statutory References: Articles II (11) and (15) and IV (2) of the *Interstate Insurance Product Regulation Compact* as adopted by Compacting States.

Operating Procedure References: Section 103 of the *Rule for Adoption, Amendment and Repeal of Rules for the Interstate Insurance Product Regulation Commission*.

II. Request for Comments

Commenters are invited to submit views and proposed language on any or all of the following topics:

- 1) The variety of Uniform Standards needed for group disability income products and the interaction between multiple standards (if any). For example,
 - a. Should the standards be structured in a similar manner as the Individual Disability Income standards where there is a core standard for each type of product within the disability income product line and separate uniform standards for rate filings, rate revisions, outline of coverage, etc.? Should the standards be structured in a similar manner to the Group Term Life Standards in terms of the treatment of policy vs. certificate requirements?
 - b. What types of product designs should be addressed? Renewability? Conversion? Continuation? Portability? Integration with Social Insurance Benefits? Incidental Benefits? Maternity Coverage? Benefit period and elimination period?
 - c. Should there be separate standards for particular group disability income benefit riders such as Catastrophic Disability Rider; COBRA Premium Rider; workplace modification rider; pension contribution rider, etc.?
- 2) The scope of each of the Uniform Standards suggested in items 1) above.
- 3) Definitions for use in the Uniform Standards. Identify definitions for and applicable to group disability income insurance products especially ones that would be new or different than the definitions in the Uniform Standards for Individual Disability Income Insurance product lines.

- 4) Key policy provisions in the Uniform Standards. Identify policy provisions for group disability income insurance products especially ones that are new or different than the provisions in the Uniform Standards for Individual Disability Income Insurance product lines.
- 5) Rate and Actuarial submission requirements. Identify rate and actuarial requirements for group disability income insurance products and explain new or different requirements than those found in the Standards for Initial Rate Filings for Individual Disability Income Insurance and Standards for Filing Revisions to Rate Filing Schedules in Individual Disability Income Insurance Policies.
- 6) General submission requirements, such as readability scores, statements of variability, various certifications from officers.
- 7) The IIPRC process for review of products, or components thereof, under the group disability income Uniform Standards. Commenters should provide information on the current state-by-state filing process across the Compacting States including how product submission, regulatory review and implementation processes are impacted based on the type of state review process for group disability income products (ranging from prior approval to exemption) and the advantages and disadvantages to each type of state review process.
- 8) Any other pertinent information or issues, including specific federal or state legislative, administrative or regulatory references, regarding product design and product content requirements as well as current product filing regulations, processes and requirements for group disability income products that may assist the Commission as it considers the framework, scope and definitions that should be used in the development of group disability income Uniform Standards.

III. How to Submit Comments

Comments Due Date: June 27, 2014. Early submissions are encouraged.

Interested persons may submit comments by electronic mail to the Interstate Insurance Product Regulation Commission at comments@insurancecompact.org. Comments may also be mailed to the Interstate Insurance Product Regulation Commission, 444 North Capitol Street, Suite 700, Washington DC 20001. Comments will be posted to the IIPRC Rulemaking Docket as received.

FOR FURTHER INFORMATION CONTACT:

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