INSTRUCTIONS FOR MAKING A COMPACT FILING

Before you begin: To make a Compact filing, an industry user must have certain roles assigned to their SERFF profile. If you do not see the “Create Compact Filing” link in Step 1 and you have submitted and received approval on your Annual Registration Fee, contact the SERFF Help Desk at serffhelp@naic.org.

The Compact requires that all filing fees be paid via EFT. Please make sure the IIPRC is noted as an authorized debtor, otherwise the fees will not be transmitted to the Compact properly.

These instructions provide specific elements to assist with the submission of a product filing through SERFF to the Compact and are intended to be used with those that are applicable to SERFF filings as provided in the SERFF User Manual. Therefore, it is assumed that you already have a working knowledge of the SERFF application. If you don’t, or need additional help, we recommend you download and review the SERFF User Manual, available under “Help” in SERFF. Additional tutorials can be found on www.serff.com under the Support header on the right-hand side.

Please note, as you begin your work in SERFF, it is recommended that you check the General Instructions as there may have been recent updates. Also be sure to review the Insurance Compact’s website for the most up-to-date information on Uniform Standards, Filing Information Notices (FINs), and other resources available. Or use the links provided in the Submission Requirements and Filing Rules.

The Compact Filing Wizard

1. To create a Compact filing, click the “Create Compact Filing” button under the Filings tab.
2. The first step the Filing Wizard will display will look familiar except that the Business Type cannot be changed from “Life, Accident/Health, Annuity, Credit”. The Compact does not accept Property/Casualty filings.

3. Step 2 in the Filing Wizard is the selection of the Type of Insurance. The Compact has been pre-selected as the “state” for this filing – the ability to include participating states will come later.

The Types of Insurance (TOI), from the Product Coding Matrix (PCM), for the products that are currently accepted by the Compact will be available for selection.

Use the TOI Link, found on the Insurer Resources Page to match up your TOI and Sub-TOI with the appropriate Uniform Standard(s) for your product.

4. After selecting the TOI, click the “Next” button and select the appropriate Sub-TOI.

5. Step 3 in the Filing Wizard is to indicate whether the filing has additional benefit features. The filer only needs to indicate yes or no” and then enter a description into the description field. Note: if the filing is a combination product, meaning that it includes multiple TOIs, the information should be provided here. If the filing is a long-term care (LTC) or disability income (DI) combination product, it should be submitted under that TOI per FIN 2017-2.

6. Step 4 in the Filing Wizard is to select the Filing Type. All Filing Types that are accepted by the Compact for the selected TOI and Sub-TOI will be available. The Submission and
Product Requirements are particular to Filing Types; therefore, it is important to select the correct Filing Type.

7. Once a Filing Type has been selected, all available participating Compact states will be marked as included. **Uncheck any state(s) that should not be included in this filing.** Only States in which the company is licensed and for which the filing is intended to be effective should be checked. A Compact registration does not supersede the licensing requirements of the States.

8. Exclusions for the selected product (TOI/Sub-TOI/Filing Type) will be listed at the bottom of the page. There are two types of exclusions.
   - State opt-outs for IIPRC standards - In these cases, the state has passed legislation or issued a regulation to opt-out of a particular product. The product cannot be filed under the Compact for that state. **NOTE:** A current list of opt out states for LTC and DI can be found in the State Uniform Standards Participation document located on the Record and Insurer Resources pages of the Insurance Compact website. No states have opted out of the Life or Annuity product lines.
• SERFF instance exclusions – When a state has split their Life and Health business units into two SERFF instances, the system must be instructed as to the instance to which a filing should be directed. This is done by excluding the non-applicable instance. As an example, for a Life filing, the Georgia Health instance will be excluded, but Georgia will still be available for selection.

Exclusions:

Georgia:
Please note that the Health instance of this State does not include Life and Annuity products. Georgia does participate in Life and Annuity Products for the IIPRC.

Kansas:
Please note that the Health instance of this State does not include Life and Annuity products. Kansas does participate in Life and Annuity Products for the IIPRC.

9. Step 5 is a summary screen. **Carefully review the information displayed, including the states listed, as the selections cannot be changed after they are saved.** If you are unsure whether a state should be included, it is best to exclude the state. Additional states can be added to the product filing submission during the product review process and/or following approval. Click the “Previous” button to navigate back through the Filing Wizard to make corrections. Click the “Save and Continue” button to lock in these selections.

<table>
<thead>
<tr>
<th>Step 5 - Confirm Selections</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>State</th>
<th>TOI</th>
<th>Sub-TOI</th>
<th>Filing Types</th>
<th>States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interstate</td>
<td>L071</td>
<td>L071.101</td>
<td>Policy Forms/Application</td>
<td>AK, AL, AR, AZ, CO, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, NE, NH, NJ, NM, NV, OH, OK, OR, PA, RI, SC, TN, TX, UT, VA, VT, WA, WI, WV, WY</td>
</tr>
<tr>
<td>Insurance</td>
<td>Individual</td>
<td>Fixed/Indeterminate Premium - Single Life</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compact</td>
<td>Life - Whole</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Step 6 is the selection of Companies and a Contact for the filing. All companies to be included in this filing should be selected here, regardless of the licensing status in various states as edits may be made in the next step. Only one contact may be selected.
11. Step 7 allows the filer to match companies with states, according to the proper company license for each state. Although the filing is being made to the Compact, the filer must still indicate which companies apply to the selected states. As in Step 4 the participating states appear as options for selection, only select those states in which the company is licensed.

12. Step 8 is the Default Filing Data page. These fields should be completed as appropriate or may be completed/changed on the filing prior to submission. The Filing Description field is the cover letter for the filing and should provide detailed information about your submission, including product information. Please do not upload a separate cover letter as an attachment to a new filing. Best practices for the Filing Description include:
   a. A concise, detailed description of the filing;
   b. A list of the forms identified by name and purpose;
   c. Identification of the Uniform Standard applicable to each form used to make the submission. Verify that the product(s) being submitted comply with the applicable uniform standard(s) which can be found on the Record on the Compact website.
d. Identify and explain any unique or innovative features of the product, including how those features comply with the applicable uniform standards.

13. Step 9, the last step of the Filing Wizard, is the Final Filing Summary. Review the information and click “Previous” to correct the companies listed or the states included. This information cannot be changed after clicking “Finish”. Clicking “Finish” will take the user into edit mode on the newly created Compact filing.

**Completing and Submitting a Compact Filing**

The process for completing and submitting a product filing to the Compact is similar to that of a single state filing, including the method for satisfying or bypassing Submission Requirements. However, there are some unique features in the tabs in SERFF for a Compact filing. Each is described below.

1. **Rate / Rate Schedule** – This tab should only be used for LTC and DI submissions. Life and Annuity submissions submit actuarial information under the Supporting Documentation tab. All rates and rating information submitted for either initial or revised rates for LTC or DI products, should be provided under the Rate/Rule Schedule tab. The information provided may be updated post-submission. Items to be included are the Actuarial Memorandum, Assumptions Excel worksheet (prepared using the sample available on the Insurer Resources page), rate schedules, and other rate data applicable to the filing. Any of these elements contained within the actuarial memorandum should also be broken out as separate rate data items by completing the steps described in the SERFF Submission Requirements.

   If you are filing a Rate Revision, the policy forms with which the revised rates will be used must be identified. Forms may not be necessarily included in these submissions. Rate revisions (increases) will be submitted in varying scenarios. A separate filing type is necessary to specify the filing elements requirements and information. This will help track revised rate filings and information contained therein, including percentages that exceed the rate increase threshold, Compact action levels and Member State actions. It will also provide easier access to rate revision information by member states and consumers. Select “Rates – Revised Rates” which has been added to the Compact SERFF instance.

2. **Supporting Documentation tab** – The requirements that are listed under the Supporting Documentation tab are unique to the Compact. The State submission requirements do not factor into a Compact filing and therefore are not provided. Each required element under the Supporting Documentation tab for the product(s) is contained within the applicable Uniform Standards. The examples provided below are just some of the applicable Submission
Requirements. Please review the applicable product line Uniform Standards for all required Submission Requirements. Additionally, the inclusion of the Submission Requirements is dependent on the selection of the TOI and Filing Type, please select the correct TOI and Filing Type. Questions regarding the Submission Requirements should be directed to the Insurance Compact Office.

A. Actuarial Memorandum - If the Life or Annuity product requires the submission of an actuarial memorandum, it should be attached here. The requirements are set forth in the Additional Submission Requirements section of every applicable Uniform Standards. For LTC and DI filings, the Actuarial Memorandum is included in the Rate/Rate schedule Tab.

B. Applicable Uniform Standards/Innovative Features/Checklists –Any unique or innovative features of the product, including how those features comply with the applicable Uniform Standards must be explained. Use this Submission
Requirement to explain unique product features and Uniform Standards applicability. If the information is NOT provided here, it MUST be provided in the Filing Description. Do not mark this Submission Requirement as “Bypassed”.

C. Application Use – The filer must provide a statement to how the application will be used and include a description of the process that will be used to verify the authenticity of the transaction. A John Doe sample should be included. The requirements to how the applications are to be used are found in the Additional Submission Requirements section of every applicable application Uniform Standards.

D. Associated Filings – This Requirement serves as a reminder that the Associated Filings for this Compact submission need to be made using the View Associated Filings in the Filing Wizard. Section 103(d) of the Operating Procedure for the Filing and Approval of Product Filings requires that at “the time a Product Filing is made, the Product Filer shall identify whether the Product Filing will be used with a Commission Product Component previously approved by or pending with the Commission.” Detailed directions regarding the completion of the Associated Filings is found on the Insurer Resources page.

E. Flesch Score – Unless specified otherwise, all Compact forms must have a minimum Flesch Score of 50. This requirement may be found within the Additional Submission Requirements section of the applicable Uniform Standards. A statement and a signed certification must be attached.

F. Sex Distinct or Unisex Policies – State whether the policy is sex-distinct or unisex. If sex-distinct, the company shall confirm that the policy will not be issued in any employer-employee plans that are subject to the Norris decision and/or Title VII of the Civil Rights Act of 1964.

G. Statement of Variability and Contract Specification Pages – The requirements for each are in the Additional Submission Requirements section of applicable Uniform Standards. Be careful to make these elements consistent with the actuarial memoranda and the forms. You must attach a detailed listing of all variable items and certify to it. The specifications page should be consistent with the rest of the filing.

H. Third Party Authorization – If a third-party filer is used to make the filing, a signed authorization on the company stationery must be attached.
3. Statement of Intent tab – The Compact has a unique tab called the Statement of Intent” (SOI). It is used to facilitate the filing of the required information regarding the mix & match process and for the Certification for these Non-Compact Forms. Please read the requirements set forth in the Insurance Compact SERFF General Instructions and Filing Rules carefully. Additional information may be found under the Filing Information Notices (FIN) on the website and in the step by step instructions provided on the Insurer Resources page, titled **Step-by-Step Instructions for Statement of Intent (SOI) Completion.** Please reference this and the **Preformatted SOI Excel Spreadsheet** located on the Insurer Resources page to complete the SOI Schedule.

If the filing does not contain a Mix & Match element, the filer will set the “SOI Schedule Required” to “No”. If you are using the template functionality to enter the data into the SOI Schedule, once the template has been uploaded into the filing, the “No” will automatically be switched to “Yes”.

The filer must select the “Filing Type” and attach the Statement of Intent and Certification form. The filer will then add rows as necessary to enter the detailed information for the SOI Schedule.

Filers must select the state. If mix and match is applicable, all states that are included in the filing should be included in the SOI. Additionally, as states are added, the SOI should be updated to reflect these states, if applicable.
Filers will then insert the information pertaining to the forms, specifically the form number. These must be unique.

The SERFF Tracking number or a state file number are then inserted.

The Regulatory Method of approval is indicated from the options provided in the drop-down.

The date that the form was legally implemented must be provided.
4. Companies and Contact tab - There are two differences on the Company/Contact tab with regard to a Compact filing.

- First, companies cannot be added as they can on a single state filing. The company information set in the Filing Wizard cannot be changed.
- Second, each company has a list of associated states. Once approved, the individual states viewing the filing will only see the companies to which they are matched.
5. Filing Fees tab – Filing to the Compact requires the use of EFT. The information on this tab must be completed before the filing can be submitted. There are two sections for the Compact and for each state that may require a fee. The “Overall” information includes: an indication of whether a fee is required; whether the basis of the fee is retaliatory; the amount of the fee required; and a text description to explain how the fee was calculated. Note: “Overall” does not mean the total amount of the fees associated with the product filing; just for that particular field – either the state or the Compact filing fee.

<table>
<thead>
<tr>
<th>Interstate Insurance Compact</th>
<th>Fee Required</th>
<th>Not Retaliatory</th>
<th>Amount</th>
<th>Fee Calculation Explanation</th>
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</thead>
<tbody>
<tr>
<td>EFT Information for Interstate Compacts</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Company</td>
<td>Amount</td>
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</tr>
<tr>
<td>SHEEP Test</td>
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</tr>
<tr>
<td>Test Group Rate</td>
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</table>

<table>
<thead>
<tr>
<th>Overall</th>
<th>Fee Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pennsylvania</td>
<td>No</td>
</tr>
<tr>
<td>West Virginia</td>
<td>No</td>
</tr>
<tr>
<td>Georgia</td>
<td>No</td>
</tr>
</tbody>
</table>

The EFT information controls the EFT transactions and the amount paid to the Compact and the states.

- Compact Per Product Filing Fee - The Compact collects a Per Product Filing Fee. The amount that is due is based on three factors – (1) whether the filing submission requires an actuarial review and (2) the premium volume as reported in Schedule T Part 2 of the Annual Report filed with the NAIC and (3) if the company is licensed in 12 or less Compact states and therefore considered regional. More specific information may be found on the Insurer Resources page, specifically the Schedule of Fees. The Per Filing Fee is required per product per company as defined in the Interstate Insurance Product Regulation (IIPRC) Terms and Procedures for IIPRC Filing Fees excerpted below.

  - A product is a policy or contract, including any application endorsement, or related form which is attached to and made part of the policy or contract for an individual or group annuity, life insurance, DI or LTC product that an Insurer is authorized to issue as detailed in the Compact Model Statute.

  - A product is also a Product component filed under the Mix and Match submission process detailed in §111 of the Operating Procedure for the Filing and Approval of Product Filings.
To complete the information for each state:

- For each state where a fee is required, check the box next to “Fee Required”. This will expand the Fee Information area for that state.
- Complete the Overall Fee section as it would be if the filing were being made directly to that state.
- All state fees for a Compact filing must be paid at the time of submission.
- Any additional fees due to the states determined upon intake will need to be remitted before your filing is assigned to the review team. All fees must be satisfied before a final disposition is received in SERFF.
- To add additional fees, click on “Submit Additional EFT Fees” and then select the proper state from the drop-down menu.
Additional information regarding individual state filing fees is located on the Insurer Resources page of the Insurance Compact website.

Complete the EFT information for the state, remitting the fees the state would normally require for this filing. Depending on the state set up, fees may be remitted in one of two ways:

1. **Per company:** For multicompany submissions in which each company is listed under the state fee section, a fee must be remitted for each company listed on the filing. Enter the correct amount next to each company. If a fee is not owed for a listed company, check the Bypassed box for that company.

<table>
<thead>
<tr>
<th>Company</th>
<th>Amount</th>
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</thead>
<tbody>
<tr>
<td>SERFF Test</td>
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<td></td>
</tr>
<tr>
<td>Test Group Name</td>
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<td></td>
</tr>
</tbody>
</table>

2. **Per company:** For multicompany submissions in which only one company is an option state fee section, the fee must be remitted equal to all fees due for the entire filing. Select a company from the list and enter the appropriate amount.

Once the Fees have been paid, the filing is ready to be submitted. Click “Submit Filing” in order to complete the filing submission and send to the Compact for review and approval.