

INTERSTATE INSURANCE
PRODUCT REGULATION COMMISSION



States, Strength & Speed Aligned

FILING INFORMATION NOTICE 2008-4

DATE: November 3, 2008

FROM: Frances Arricale
IIPRC Executive Director

RE: **Statement of Intent Filing Formats**

Statutory References: Articles II. (11), IV. (6), VII. (1), and X. (2) of the *Interstate Insurance Product Regulation Compact* as adopted by Member States.

Operating Procedure References: Sections 103 and 110 of the *Operating Procedure for the Filing and Approval of Product Filings*.

BACKGROUND:

The Interstate Insurance Product Regulation Commission (“IIPRC”) *Operating Procedure for the Filing and Approval of Product Filings*, or “Product Filing Rule” provides for an interim process that affords insurers the option to utilize a State Product Component with a Product Component filed for review and approval by the IIPRC. This has been termed the “Mix and Match” process and requires insurers to file a Statement of Intent with specificity of the State Product Components to be utilized with an IIPRC filing as well as a Certification that the “Mix and Match” of forms is appropriate.

The specificity for the Statement of Intent requires that insurers list for each State Product Component, the Member State approval date, form number and SERFF tracking number if applicable, or state file number if available.

In response to the need of our Member States for “Mix and Match” data that is more easily accessible, and the Insurers’ need for a Statement of Intent template that is easier to complete, we are implementing the use of new Statement of Intent and Certification templates to be completed and attached to SERFF filings that utilize the “Mix and Match” option. The templates may be accessed from the SERFF General Instructions and the “Mix and Match” Submission Requirement. The form is also available on our IIPRC web site at:

http://www.insurancecompact.org/compact_industry_resources.htm.

FILING PROCEDURE:

If an insurer wishes to make a filing with the IIPRC utilizing the “Mix and Match” option, the following procedures must be followed.

- There are two template forms that must be completed and attached to the Submission Requirement – a *Statement of Intent and Certification Form* in .pdf format, and an *Appendix 1: List of Forms* spreadsheet in Excel format.
- The *Statement of Intent and Certification Form* must be dated and signed by a company officer. An electronic signature may be used. Attach the completed *Statement of Intent and Certification Form* under the applicable Submission Requirement.
- Complete the *Appendix 1* spreadsheet to include the specific information for each State Component and Member State with which the IIPRC-approved forms in the filing will be used. Please group the State Product Components by state, so that forms to be used in each Member State are listed together.
- Specify the regulatory method under which each State Component was placed into effect: "Approved", "File and Use", "Use and File", "Informational" or "Exempt". Enter the date the form was legally implemented preceded by the applicable prefix (A, F, I, U, E). For State Components approved and implemented prior to 1970 for which there may not be tracking information, enter “P70”.
- State Components that are pending approval should not be included in the list. Only forms duly approved/accepted in Member states may be listed on the Statement of Intent
- After completing the spreadsheet as detailed above, convert the spreadsheet to .pdf format. Attach two (2) copies of the completed *Appendix 1* spreadsheet under the applicable Submission Requirement – one in Excel format and one in .pdf format.
- If the insurer intends to obtain additional approvals for forms from Member states either simultaneously or immediately after receiving an approval from the IIPRC for use of any State Product Components with an IIPRC-approved product (the so-called “Reverse Mix and Match” procedure), the insurer will need to follow the Supplemental Filing procedures detailed in Filing Information Notice 2008-1, in addition to these noted procedures. http://www.insurancecompact.org/compact_industry_resources.htm.
- The Certification Form and Statement of Intent Spreadsheet templates can be downloaded from the IIPRC web site “Industry Resource Page” and from links in the IIPRC SERFF General Instructions and the Submission Requirement screen.

APPLICABLE IIPRC FORMS:

STATEMENT OF INTENT SPREADSHEET CERTIFICATION FORM

<http://www.insurancecompact.org/fin.htm>

EFFECTIVE DATE:

This Filing Information Notice is effective immediately.

CONTACT INFORMATION:

Questions regarding this Notice should be directed to:

Interstate Insurance product Regulation Commission

444 North Capitol Street, NW

Hall of the States, Suite 701

Washington, DC 20001-1509

tel: (202) 471-3962

Fax: (816) 460-7476

comments@insurancecompact.org