



INSTRUCTIONS FOR UPDATED FORM SUBMISSION PROCESS FOR INDIVIDUAL LONG-TERM CARE ADVERTISING FILINGS

Starting March 22, 2022, the Interstate Insurance Product Regulation Commission (Compact) will require filers to make a single filing for each individual long-term care insurance (LTC) advertising submission.

BACKGROUND

The Compact's long-standing approach for submission of long-term care advertising forms is for all advertising material to be submitted and reviewed in a single SERFF submission per Compact-approved LTC product. Once approved, the single filing was reopened for submission and review of any new advertising forms. While the filing was open, additional advertising forms could be submitted at any time, with each time new advertising forms were submitted being considered a new submission with Compact and state fees due.

To end the previous approach of bulky and uniquely organized filings, and in connection with the anticipated withdrawal of South Carolina as a Compacting State, the Compact is implementing a pilot project to change the method for filing new advertising material. In developing its approach, the Compact Office surveyed the filers most often submitting new advertising material about aspects of the change and its impact.

The Insurance Compact Office expects great benefit for its reviewers, member states and filers as a per-submission filing process will bring the filing process in line with how other products are filed and flatten the learning curve for working with the legacy advertising filings. This new process will avoid the voluminous material contained within the legacy filings, which makes moving through the legacy filings time consuming. The filing fees would also be easier to view and audit for both the Insurance Compact and the member states.

The modified process will be implemented on a pilot basis from March 22nd to October 1st, 2022, at which time the Insurance Compact Office will assess whether further changes to the submission process are needed. Advertising forms approved in a legacy filing will remain approved with no further action needed going forward, and they will remain accessible to the included states, filer and Compact Office in SERFF and available through SERFF Filing Access.

INSTRUCTIONS

Each submission of one or more advertising forms will be made in a new, distinct SERFF filing. The form(s) and supporting material will continue to be reviewed through the normal correspondence process in the order filed unless an exception to the order filed is requested by the filer. The disposition date will be the date of approval for the forms in the filing. Forms will only be approved once review is complete and all forms in the submission are determined to be compliant with *Standards for Individual Long-Term Care Insurance Advertising Material*, [IIPRC-LTC-I-3-ADV](#).

As part of this change, the Compact will accept long-term care advertising submissions under the Insurance Compact's Expedited Review Process. Additional detail will be addressed in the materials for the Expedited Review Process.

FILING PROCEDURES FOR LONG-TERM CARE ADVERTISING FORMS

The Insurance Compact requests that filers follow these steps when submitting new advertising forms:

1. The filer will submit a single SERFF filing for each LTC advertising submission using the same Type of Insurance as the approved LTC product and the filing type of Advertising Material.
2. One or more forms may be submitted for review on the Form Schedule of the filing.
3. A new submission requirement will appear on the Supporting Documentation tab of filings under the Advertising Material filing type requiring the filer to submit pertinent information for each form included in the submission in table format. By submitting this information in a table format, it does not need to be stated anywhere else in the filing. The table may be attached in a format other than PDF. An example table is provided in Appendix 1. The table must include the information required in Section 1(A) Additional Submission Requirements, General, including but not limited to:
 - a. Form Name
 - b. Form Number
 - c. The type of advertisement of each form: either institutional, invitation to inquire, or invitation to contract (**NOTE:** This is the most common, repeated objection and is always required to be identified before review can proceed per §1(A)(6))
 - d. The method or media of dissemination for each form: brochure, letter, illustration distributed electronically, printed, internet, etc.
 - e. The SERFF Tracking Number of the product(s) with which the advertisement form will be used
4. The filer will use the Associated Filings feature to identify the Compact-approved individual long-term care product(s) with which the advertisement will be used.
5. The filer will submit applicable Compact and state filing fees. There are no changes to the Compact Filing Fee Schedule with this process change.
6. Companies are strongly encouraged to review objections to previously approved forms and ensure the new forms address compliance with all applicable provisions of the *Standards for Individual Long-Term Care Insurance Advertising Material* (**NOTE:** The Insurance Compact commonly issues repeat objections when changes made in previously submitted forms are not carried forward to subsequently submitted forms).

Appendix 1. Sample Advertising Form Detail Table

Form Schedule Line	Form Number	Form Name	Type of Advertisement	Method of Dissemination	Approved Product SERFF Tracking No.
1	ICC22LTCAD55592	Presentation-Sales Force	Institutional	Producer presentation	ABCD-429888100
2	ICC22LTCAD54192	Brochure-What is LTC	Invitation to Inquire	Print brochure	ABCD-429888100
3	ICC22LTCAD54193	Learn More About LTC	Invitation to Inquire	Online banner ad	ABCD-429888100
4	ICC22LTCAD541110	LTC Benefit Illustration	Invitation to contract	Print and electronic delivery	ABCD-429101003