

TECHNICAL ITEMS – Noticed 8/13/2013

Technical Items

Technical items are proposed changes and corrections to the Uniform Standards to make formatting, typographical, and/or drafting corrections that would not change the meaning or effect of the provision, or the current application and interpretation of the provision or applicable Uniform Standards. Technical items would also encompass changes that would make the Uniform Standards consistent with one another where appropriate, in terms of formatting and wording. The IIPRC Office will insert and clearly distinguish technical items in the Uniform Standards. As has been the practice when making technical changes to the Uniform Standards during the rulemaking process, these technical items will not be specifically discussed unless there is a concern or question raised by members, regulators, or interested parties.

List of Technical Change Items

1. Inclusion of Table of Contents
2. Language Consistency
3. Mix and Match and Self-Certification Applicability
4. Formatting Consistency – Citation
5. Title Changes
6. Inclusion of “Nonforfeiture”
7. Typographical Change – “s”
8. Typographical Change – “.”
9. Formatting Consistency – Actuarial Submission Requirements
10. Typographical Change – “ $\frac{1}{2}$ ”
11. Typographical Clean-Up
12. Correct NAIC Model Reference

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1. INCLUSION OF TABLE OF CONENTS

APPLIES: All individual life insurance Uniform Standards subject to 5-year review as noticed on July 3, 2012.

CURRENT PROVISION: Currently, the individual life insurance Uniform Standards do not contain a Table of Contents.

COMMENTS:

IAC Comments: The IAC did not submit comments on this issue.

IIPRC Office Comment/Observation: The IIPRC Office received a suggestion through the website to include a Table of Contents in all Uniform Standards. Currently, the only Uniform Standards that do contain a Table of Contents is the Core Standards for Individual Long-Term Care Insurance Policies.

IIPRC Office Recommendation: The IIPRC Office would agree with this suggestion and will incorporate a Table of Contents to all individual life insurance Uniform Standards.

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2. LANGUAGE CONSISTENCY

APPLIES: All individual life insurance Uniform Standards subject to 5-year review as noticed on July 3, 2012.

CURRENT PROVISION:

1. Currently, there are some references that are exclusive of permitted benefits in the Scope Section of the individual life insurance Uniform Standards that were drafted early.

Deposit term plans, plans that provide joint and last to die survivorship coverage, plans sold in connection with pre-need funeral arrangements, plans providing early duration reduced benefits, or plans providing return of premium benefits shall not be submitted under these standards.

2. **Scope:** These standards are intended to apply to traditional forms of individual single premium whole life insurance.

Plans that are interest sensitive with an account value, plans that provide joint and last to die survivorship coverage, plans sold in connection with pre-need funeral arrangements, or plans providing early duration reduced benefits shall not be submitted under these standards.

3. **§1 (A)(2)** If a filing is submitted on behalf of a company, a letter or other document authorizing the firm to file on behalf of the company shall be included with the filing.

COMMENTS:

IAC Comments: The IAC submitted written comments in November 2012 requesting that the Additional Submission Requirements in all Uniform Standards be consistent.

IIPRC Office Comment/Observation: The IIPRC Office would agree that the Uniform Standards be consistent and not in the passive voice, but more directive as this is a filing requirement. The IIPRC Office has observed that some of the individual life insurance Uniform Standards have not been updated to be inclusive of permitted benefits. In 2010, the Individual Whole Life Insurance Policy Standards were amended to clarify the scope of the rule in connection with the adoption of additional standards for benefits specifically excluded from this rule. The aforementioned Uniform Standards were accidentally overlooked with regard to this amendment.

IIPRC Office Recommendation: The IIPRC would recommend that the ADDITIONAL SUBMISSION REQUIREMENTS provision be amended as follows. Additionally, the IIPRC Office would recommend that the Scope sections of all individual life insurance Uniform Standards be amended so to be consistent with the language used in indicating what other

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additional standards may be used with the Uniform Standard. The IIPRC Office would recommend that the applicable Uniform Standards be amended to reflect similar language found in the Individual Whole Life Insurance Policy Standards.

§1 (A)(2) If a filing is submitted on behalf of a company, include a letter or other document authorizing the firm to file on behalf of the company ~~shall be included~~ with the filing.

The amendment to the ADDITIONAL SUBMISSION REQUIREMENTS would not affect the following Uniform Standards:

- Individual Whole Life Insurance Policy Standards;
- Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis;
- Standards for Additional Term Life Insurance Benefits;
- Standards for Waiver of Premium Benefits for Child Insurance in the Event of Payor's Total Disability or Death;
- Standards for Waiver of Monthly Deduction Benefits;
- Standards for Accidental Death Benefits;
- Standards for Accelerated Death Benefits;
- Standards for Accidental Death and Dismemberment Benefits; and
- Standards for Waiver of Premium Benefits.

Deposit term plans, plans that provide joint and last to die survivorship coverage, plans sold in connection with pre-need funeral arrangements, and plans providing early duration reduced benefits. Additional standards apply to,–_or plans providing return of premium benefits (intermediate period endowment benefits)-shall not be submitted under these standards.

These standards are intended to apply to traditional forms of individual single premium whole life insurance.

Plans that are interest sensitive with an account value, plans that provide joint and last to die survivorship coverage, plans sold in connection with pre-need funeral arrangements, or plans providing early duration reduced benefits shall not be submitted under these standards.

Additional standards apply to individual whole life policies that provide for graded death benefits (except for jumping juvenile policies, where the death benefits increase at a specified age) and plans providing return of premium benefits (intermediate period endowment benefits).

The Amendment to the Scope Section of the individual whole life insurance Uniform Standards specifically applies to the following:

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Individual Single Premium Whole Life Insurance Policy Standards;
Individual Joint Last to Die Survivorship Whole Life Insurance Policy Standards; and
Individual Single Premium Joint Last to Die Survivorship Whole Life Insurance Policy
Standards.

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3. INCLUSION OF MIX AND MATCH AND SELF-CERTIFICATION APPLICABILITY

APPLIES: All individual life insurance Uniform Standards subject to 5-year review as noticed on July 3, 2012. This change would not affect the Individual Term Life Insurance Policy Standards and the Individual Whole Life Insurance Policy Standards as the language was included when the Uniform Standards were amended in October 2010.

CURRENT PROVISION: Currently, if the Uniform Standards are silent with regard to Mix and Match, it is permitted. If the Uniform Standards are silent with regard to Self-Certification, it is not permitted.

COMMENTS:

IAC Comments: The IAC has suggested that each Uniform Standards include the Mix and Match and Self-Certification statements.

IIPRC Office Comment/Observation: During the initial drafting of these applicable Uniform Standards, there was a timeline in place regarding the duration of Mix and Match. That timeline was removed in December 2009. When the timeline was removed, it was stated that if the Uniform Standards were silent with regard to Mix and Match, then it was permitted. The development and adoption of the Rule for the Self-Certification of Product Components filed with the Interstate Insurance Product Regulation Commission took place after the development of the individual life Uniform Standards. The Self-Certification Rule states that a “self-certified product filing may be made for Product Components which have been designated for self-certification as expressly authorized by the applicable Uniform Standard.” (§102(a))

IIPRC Office Recommendation: The IIPRC Office would recommend that this would be the appropriate time to insert the language into the Uniform Standards.

Mix and Match: [These standards are available to be used in combination with State Product Components as described in Section 110\(b\) of the Operating Procedure for the Filing and Approval of Product Filings.](#)

Self-Certification: [These standards are not available to be filed using the Rule for the Self-Certification of Product Components Filed with the Interstate Insurance Product Regulation Commission.](#)

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4. FORMATTING CONSISTENCY

APPLIES:

Standards for Accelerated Death Benefits;
Standards for Accidental Death Benefits;
Standards for Accidental Death and Dismemberment Benefits;
Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis;
Standards for Additional Term Life Insurance Benefits;
Standards for Waiver of Premium Benefits;
Standards for Waiver of Monthly Deduction Benefits; and
Standards for Waiver of Premium Benefits for Child Insurance in The Event of Payor's Total Disability or Death;

CURRENT PROVISION: Currently there are no Section, item, and paragraph numberings in the aforementioned Uniform Standards.

COMMENTS:

Industry Advisory Committee (IAC) Comments: The IAC did not submit any comments on this issue.

IIPRC Office Comment/Observation: During the drafting of these Uniform Standards the Section, item, and paragraph numbering was overlooked. It makes it rather difficult to provide a proper citation in filing correspondence without these.

IIPRC Office Recommendation: The IIPRC Office would recommend that the aforementioned Uniform Standards are amended to include Section, item, and paragraph numbering consistent with other Uniform Standards.

§ 1 ADDITIONAL SUBMISSION REQUIREMENTS

A. GENERAL

The following additional filing submission requirements shall apply:

- (1) A statement of the types of policy forms with which this benefit will be offered, any underwriting restrictions involving face amount or age, and whether the benefit is intended for use with new issues and/or in force business.
- (2) ...

§ 2 BENEFIT PROVISIONS

A. BENEFIT

5. CHANGES TO TITLE

APPLIES:

Individual Flexible Premium Adjustable Life Insurance Policy Standards;
Individual Joint Last to Die Survivorship Flexible Premium Adjustable Life Insurance Policy Standards;
Individual Flexible Premium Variable Adjustable Life Insurance Policy Standards;
Individual Joint Last to Die Survivorship Flexible Premium Variable Adjustable Life Insurance Policy Standards; and
Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis.

CURRENT PROVISION: Currently there are no references to whether or not the Uniform Standards provide for lapse guarantee or paid-up additions benefits in the title of the Uniform Standards.

COMMENTS:

IAC Comments: The IAC submitted comments on this issue during the development of the life core standards. The intent was to provide more clarification as to what can be filed using these Uniform Standards.

Individual Flexible Premium Adjustable Life Insurance Policy Standards ([including no lapse guarantee benefit feature](#));
Individual Joint Last to Die Survivorship Flexible Premium Adjustable Life Insurance Policy Standards ([including no lapse guarantee benefit feature](#));
Individual Flexible Premium Variable Adjustable Life Insurance Policy Standards ([including no lapse guarantee benefit feature](#));
Individual Joint Last to Die Survivorship Flexible Premium Variable Adjustable Life Insurance Policy Standards ([including no lapse guarantee benefit feature](#)); and
Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis ([including Paid-Up Additions Benefit Feature](#)).

IIPRC Office Comment/Observation: The IIPRC Office has not observed any confusion with the titles of the Uniform Standards and what is permitted under these Uniform Standards.

IIPRC Office Recommendation: The IIPRC Office would recommend that the Scope Sections of the aforementioned Uniform Standards be amended to reflect whether or not no lapse guarantee benefit features are included in the Uniform Standards and not amend the titles of the aforementioned Uniform Standards.

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6. INCLUSION OF “NONFORFEITURE”

APPLIES: All individual life insurance Uniform Standards subject to 5-year review as noticed on July 3, 2012. This change would not affect the following Uniform Standards:

- Standards for Individual Life Application Change Form;
- Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis;
- Standards for Waiver of Premium Benefits for Child Insurance in the Event of Payor’s Total Disability or Death;
- Standards for Waiver of Monthly Deduction Benefits;
- Standards for Accidental Death Benefits;
- Standards for Accelerated Death Benefits;
- Standards for Accidental Death and Dismemberment Benefits;
- Standards for Waiver of Premium Benefits; and
- Individual Life Insurance Application Standards.

CURRENT PROVISION:

B. ACTUARIAL MEMORANDUM REQUIREMENTS

(1)(a) A demonstration that the values of the policy comply with the minimums required by Section 6.B. of the NAIC Universal Life Insurance Regulation...

C. VARIABILITY OF INFORMATION

(4) In addition to the items listed in Paragraph (3) above, a change or modification to any other item not specifically listed that may affect the derivation and compliance of policy values with any required minimum nonforfeiture values...

COMMENTS:

IAC Comments: The IAC submitted written comments in November 2012 requesting that the word “nonforfeiture” be included in the two aforementioned provisions in the individual life insurance Uniform Standards.

IIPRC Office Comment/Observation:

IIPRC Office Recommendation:

B. ACTUARIAL MEMORANDUM REQUIREMENTS

(1)(a) A demonstration that the [nonforfeiture](#) values of the policy comply with the minimums required by Section 6.B. of the NAIC Universal Life Insurance Regulation...

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C. VARIABILITY OF INFORMATION

- (4) In addition to the items listed in Paragraph (3) above, a change or modification to any other item not specifically listed that may affect the derivation and compliance of policy [nonforfeiture](#) values with any required minimum nonforfeiture values...

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7. TYPOGRAPHICAL CHANGES – “s”

APPLIES: All individual life Uniform Standards subject to 5-year review as noticed on July 3, 2012. This change would not affect the following Uniform Standards:

- Standards for Additional Term Life Insurance Benefits;
- Standards for Individual Life Application Change Form;
- Standards for Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis;
- Standards for Waiver of Premium Benefits for Child Insurance in the Event of Payor’s Total Disability or Death;
- Standards for Waiver of Monthly Deduction Benefits;
- Standards for Accidental Death Benefits;
- Standards for Accelerated Death Benefits;
- Standards for Accidental Death and Dismemberment Benefits;
- Standards for Waiver of Premium Benefits; and
- Individual Life Insurance Application Standards.

CURRENT PROVISION:

D. READABILITY REQUIREMENTS

- (2) The policy shall be presented, except for specification pages, schedules and tables, in not less than ten point type, one point leaded.

§2 GENERAL FORM REQUIREMENTS

A. COVER PAGE

- (8) For any policy that is convertible, the cover page shall include the conversion period unless it is shown on the specification page.

COMMENTS:

IAC Comments: The IAC submitted written comments in November 2012 requesting that the letter “s” be added to “specification” in the aforementioned provisions within the individual life Uniform Standards.

IIPRC Office Comment/Observation:

IIPRC Office Recommendation:

D. READABILITY REQUIREMENTS

- (2) The policy shall be presented, except for specifications pages, schedules and tables, in not less than ten point type, one point leaded.

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§2 GENERAL FORM REQUIREMENTS

A. COVER PAGE

- (8) For any policy that is convertible, the cover page shall include the conversion period unless it is shown on the specifications page.

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8. TYPOGRAPHICAL CHANGES – “. ”

APPLIES:

Individual Modified Single Premium Adjustable Life Insurance Policy Standards

CURRENT PROVISION:

B. ACTUARIAL MEMORANDUM REQUIREMENTS

(1)(d) The guaranteed maximum cost of insurance rates for all ages, male and female, unisex, if applicable, smoker and nonsmoker, and all underwriting classes Any formula...

COMMENTS:

IAC Comments: The IAC submitted written comments in November 2012 requesting that the period be added to the end of the first sentence in the aforementioned provision.

IIPRC Office Comment/Observation: The IIPRC Office has not observed any confusion among filers about this provision. The IIPRC Office agrees the provision is missing punctuation.

IIPRC Office Recommendation: The IIPRC Office agrees with the suggestion to insert a period before “Any”.

B. ACTUARIAL MEMORANDUM REQUIREMENTS

(1)(d) The guaranteed maximum cost of insurance rates for all ages, male and female, unisex, if applicable, smoker and nonsmoker, and all underwriting classes. Any formula...

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9. FORMATTING CONSISTENCY

APPLIES: Standards for Additional Term Life Insurance Benefits and Standards for Accelerated Death Benefits

CURRENT PROVISION:

The following additional filing submission requirements shall apply:

A. GENERAL

- (1) A statement of the types of policy forms with which this benefit will be offered, any underwriting restrictions involving benefit amount or age, and whether the benefit is intended for use with new issues and/or in force business.
- (2) A description of the benefit for all types of forms with which the benefit will be used.
- (3) The formulae, if any, used to determine the benefit, including any limitations on the amount of the benefit and sample calculations for representative issue ages, including issue age 35 if within the issue age range.
- (4) Include an actuarial memorandum prepared, dated and signed by the member of the American Academy of Actuaries who provides the following information for all available guarantee periods concerning the determination of the nonforfeiture values or cost of insurance rates:
 - (a) A demonstration that nonforfeiture values of the form comply with the standards of the NAIC Standard Nonforfeiture Law for Life Insurance, model #808. The smoker/nonsmoker mortality tables in the NAIC Model Rule (Regulation) Permitting Smoker/Nonsmoker Mortality Tables For Use In Determining Minimum Reserve Liabilities And Nonforfeiture Benefits, or the mortality rates which are a blend of the male and female rates in the NAIC Procedure For Permitting Same Minimum Nonforfeiture Standards For Men and Women Insured Under 1980 CSO And 1980 CET Mortality Tables, or any other mortality tables approved for use by the NAIC in determining minimum nonforfeiture values may be used in determining minimum nonforfeiture values. The company shall use the composite mortality table for issue ages at which there is no distinction between smoker and nonsmoker mortality rates and continue to use the table for all future attained ages;
 - (b) A description of the form provisions which affect any nonforfeiture values;
 - (c) Identification and description of the source of the applicable mortality tables that are the basis of any guaranteed maximum cost of the insurance rates;
 - (d) For benefits with identifiable charges that are subject to change:

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- (i) A certification that the same initial rating classes will apply whenever identifiable charges change;
 - (ii) Guaranteed maximum identifiable charges for all ages, male and female, unisex, if applicable, smoker and nonsmoker, and all underwriting classes; and
 - (iii) The guaranteed periods, if any, for the current identifiable charges;
- (e) For benefits with identifiable charges in the form of cost of insurance rates, a description of the source of the applicable mortality tables that are the basis of the guaranteed identifiable charges. Any formula consistent with generally accepted actuarial methodologies and applicable Actuarial Standards of Practice may be used to convert the guaranteed maximum identifiable charges to their equivalent modal guaranteed maximum identifiable charges provided such modal rates do not exceed the lesser of:

$$\{1-(1-qx)^{(1/n)}\} / \{(1-qx)^{(1/n)}\} \quad \text{or} \quad 1/n$$

where n equals the number of cost of insurance deductions from the account value per year and qx is the annual mortality rate from the applicable table;

- (f) The formulae, assumptions and methodology used for determining any nonforfeiture values;
- (g) Sample calculations for any nonforfeiture values at representative issue ages including issue age 35 if within the issue age range;
- (h) Certification as to compliance with the NAIC Standard Nonforfeiture Law for Life Insurance, model #808, if the form provides nonforfeiture values; and
- (i) The range of issue ages and the minimum benefit amount for which the form will be issued.

COMMENTS:

(IAC Comments: The IAC did not submit any comments on this issue.

IIPRC Office Comment/Observation: During the drafting of these Uniform Standards the Actuarial Memorandum requirements were included in the same provision with all General Additional Submission Requirements.

IIPRC Office Recommendation: The IIPRC Office would recommend that the aforementioned Uniform Standards are amended to include a separate Actuarial Memorandum Requirements provision to be consistent with all other Uniform Standards.

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~~The following additional filing submission requirements shall apply:~~

A. GENERAL

The following additional filing submission requirements shall apply:

- (1) A statement of the types of policy forms with which this benefit will be offered, any underwriting restrictions involving benefit amount or age, and whether the benefit is intended for use with new issues and/or in force business.
- (2) A description of the benefit for all types of forms with which the benefit will be used.
- (3) The formulae, if any, used to determine the benefit, including any limitations on the amount of the benefit and sample calculations for representative issue ages, including issue age 35 if within the issue age range.

B. ACTUARIAL MEMORANDUM REQUIREMENTS

- (1) Include an actuarial memorandum prepared, dated and signed by the member of the American Academy of Actuaries who provides the following information for all available guarantee periods concerning the determination of the nonforfeiture values or cost of insurance rates:
 - (a) A demonstration that nonforfeiture values of the form comply with the standards of the NAIC Standard Nonforfeiture Law for Life Insurance, model #808. The smoker/nonsmoker mortality tables in the NAIC Model Rule (Regulation) Permitting Smoker/Nonsmoker Mortality Tables For Use In Determining Minimum Reserve Liabilities And Nonforfeiture Benefits, or the mortality rates which are a blend of the male and female rates in the NAIC Procedure For Permitting Same Minimum Nonforfeiture Standards For Men and Women Insured Under 1980 CSO And 1980 CET Mortality Tables, or any other mortality tables approved for use by the NAIC in determining minimum nonforfeiture values may be used in determining minimum nonforfeiture values. The company shall use the composite mortality table for issue ages at which there is no distinction between smoker and nonsmoker mortality rates and continue to use the table for all future attained ages;
 - (b) A description of the form provisions which affect any nonforfeiture values;
 - (c) Identification and description of the source of the applicable mortality tables that are the basis of any guaranteed maximum cost of the insurance rates;
 - (d) For benefits with identifiable charges that are subject to change:

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- (i) A certification that the same initial rating classes will apply whenever identifiable charges change;
 - (ii) Guaranteed maximum identifiable charges for all ages, male and female, unisex, if applicable, smoker and nonsmoker, and all underwriting classes; and
 - (iii) The guaranteed periods, if any, for the current identifiable charges;
- (e) For benefits with identifiable charges in the form of cost of insurance rates, a description of the source of the applicable mortality tables that are the basis of the guaranteed identifiable charges. Any formula consistent with generally accepted actuarial methodologies and applicable Actuarial Standards of Practice may be used to convert the guaranteed maximum identifiable charges to their equivalent modal guaranteed maximum identifiable charges provided such modal rates do not exceed the lesser of:

$$\{1-(1-qx)^{(1/n)}\} / \{(1-qx)^{(1/n)}\} \quad \text{or} \quad 1/n$$

where n equals the number of cost of insurance deductions from the account value per year and qx is the annual mortality rate from the applicable table;

- (f) The formulae, assumptions and methodology used for determining any nonforfeiture values;
- (g) Sample calculations for any nonforfeiture values at representative issue ages including issue age 35 if within the issue age range;
- (h) Certification as to compliance with the NAIC Standard Nonforfeiture Law for Life Insurance, model #808, if the form provides nonforfeiture values; and
- (i) The range of issue ages and the minimum benefit amount for which the form will be issued.

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10. TYPOGRAPHICAL CHANGES – “;”

APPLIES: Individual Life Insurance Application Standards

CURRENT PROVISION:

B. VARIABILITY OF INFORMATION

(1) The company may identify items that will be considered variable in the application, but such variability shall be limited to:

- (a) The company, address and other contact information;

COMMENTS:

IAC Comments: The IAC did not submit any comments on this issue.

IIPRC Office Comment/Observation: The comma provides the impression that the Company name may be variable.

IIPRC Office Recommendation: The IIPRC Office would recommend that the comma be removed from the aforementioned provision in the Uniform Standards.

B. VARIABILITY OF INFORMATION

(1) The company may identify items that will be considered variable in the application, but such variability shall be limited to:

- (a) The company; address and other contact information;

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11. TYPOGRAPHICAL CLEAN-UP

APPLIES: Individual Life Insurance Application Standards

CURRENT PROVISION: Entire Uniform Standards

§1 A.(4) If the application will be used for multiple purposes:

- (a) The intended purpose shall appear at the top of the first or cover page of the application, and a means of designating the intended ~~use~~ purpose shall be available, such as a checkbox in front of each ~~use~~ purpose. A “blank space write in” format is not acceptable.

COMMENTS:

IAC Comments: The IAC did not submit any comments on this issue.

IIPRC Office Comment/Observation: During the work required for this document, the IIPRC Office noticed that previous “red-line” changes were not properly deleted from the aforementioned Uniform Standards. These changes were not “track changed”, but were rather hard-keyed.

IIPRC Office Recommendation: The IIPRC Office would recommend that the previous changes be removed from the aforementioned Uniform Standards.

§1 A.(4) If the application will be used for multiple purposes:

- (a) The intended purpose shall appear at the top of the first or cover page of the application, and a means of designating the intended ~~use~~ purpose shall be available, such as a checkbox in front of each ~~use~~ purpose. A “blank space write in” format is not acceptable.

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12. CORRECT NAIC MODEL REFERENCE

APPLIES: Individual Flexible Premium Variable Adjustable Life Insurance Policy Standards

CURRENT PROVISION:

Appendix C

In my opinion, the nonforfeiture values available under this policy equal or exceed the minimums required under Section 6A of the NAIC Universal Life Insurance Regulation, Model #585 for all ages, rate classes, and durations at which the policy is available.

COMMENTS:

IAC Comments: The IAC submitted written comments in November 2012 indicating that the reference in the current version of the Uniform Standards was incorrect and it should be in fact “Section 6A of the NAIC Variable Life Insurance Regulation, Model #270 using Actuarial Guideline XXIV”.

IIPRC Office Comment/Observation: The IIPRC Office agrees with this proposed change as it is consistent with the citation used in the Actuarial Requirements (1)(h) which refers to Appendix C.

IIPRC Office Recommendation: The IIPRC Office would recommend that the suggested edits are made to the aforementioned Uniform Standards.

Appendix C

In my opinion, the nonforfeiture values available under this policy equal or exceed the minimums required under Section 6A of the NAIC [Universal-Variable](#) Life Insurance Regulation, Model [#585-270 using Actuarial Guideline XXIV](#) for all ages, rate classes, and durations at which the policy is available.