SERFF Product Steering Committee Meeting

Wednesday, April 19

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

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Roll Call

- Roll was called for current PSC members

- Interested parties who called in and wish their attendance to be recorded can email lbandle@naic.org

SERFF Modernization Progress Updates

Phase 1

- SERFF 8.4 updates to Pilot Search
  - March 16
    - Ability to search by Primary Reviewer
    - Ability to search by Disposition Status
    - Ability to search for inactive TOI, Sub-TOI, Filing Type
    - Ability to search for confidentiality requests on full filings

Phase 2

- SERFF Data to Enterprise Data Warehouse
  - In production environment and monitoring performance
- Tableau Reports
  - Projecting end of April for Pilot Group Reviews
- Next Steps
  - State SnowSight POC – May/June Timeframe

Phase 3.1 Interstate Compact

- In Development
  - Amendment Workflow
  - Filing Assignment Rules Configuration
  - Hardening Sprint Items
    - Defects and Enhancements from the entire quarter
- Quarterly Planning Preparation

Industry Focus Group Survey

- Link: Focus Group Survey
- Only for industry users
  - State users are being contacted separately for focus group participation
- Focus groups will be spun up gradually during the project

SERFF Modernization Engagement Activity

- Used online tool – Slido
- About 100 PSC attendees participated
- Main topics covered: Form and Rate/Rule Schedule Reordering, Reopened Filings
- Questions from the activity are on pages 10-13
- Results from the Activity start on page 16
- **If you were not able to participate in the activity or would like to expand on your answers, feel free to email responses to the questions to Lauren (lbandle@naic.org) and Bridget (bkieras@naic.org)**
  - Please include what type of SERFF user you are (state, industry, or other) and how frequently you use SERFF (daily, weekly, once a month or less) with your answers.

Form Schedule Item Order

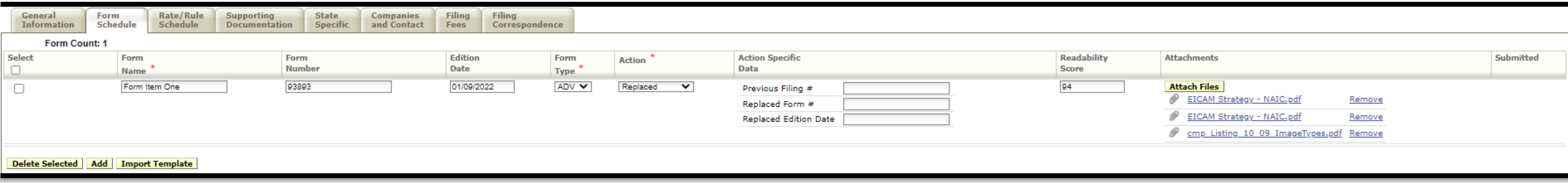
Feedback we have received:

- Can we add a form in the middle of the list?
- Can we reorder based on a column sort?
- Can we number the item order ourselves?
- The arrow up and down to reorder is too time-consuming.

Questions:

- Does the order of form schedule items matter? If so, why?
- When do you put the form schedule items in the correct order?
  - Before adding them
  - While adding them
  - After adding them
- Should there be a default order for form schedule items? If so, what?
- What is lead form number used for?
- How do you choose which form to use as the lead form number?

Form Schedule Item Processing



Current Workflow:

1. Enter data manually
2. Upload files

IDP Workflow:

IDP = Intelligent Document Processing

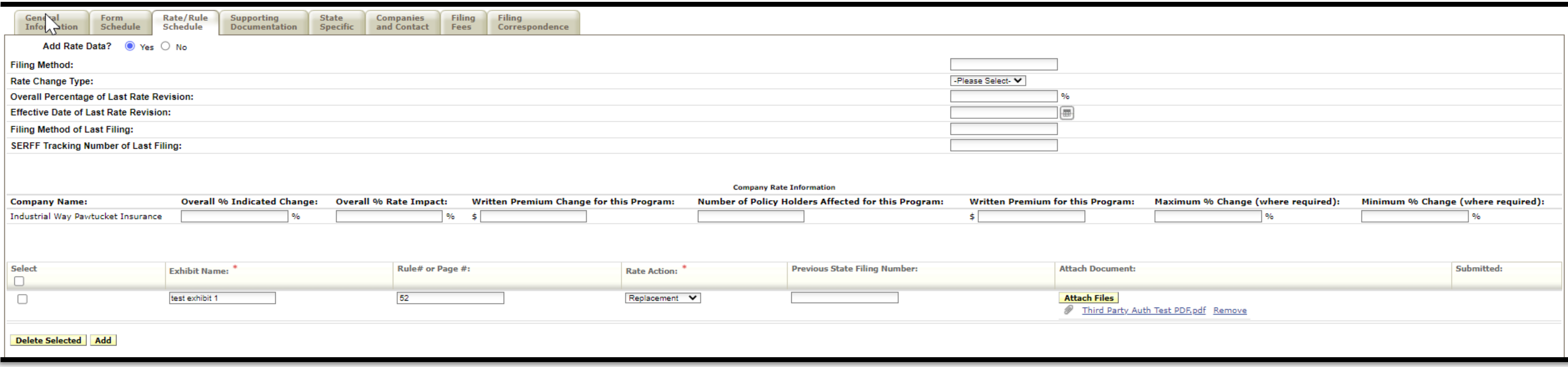
1. Upload file(s)
2. Classification – determine form type
3. Extraction – Identify form #, name, edition date
4. User review and correct

Training – initial will use compact/historical files, user correction will continue the training.

Questions:

- Are there any other form schedule data elements that should be added?
- What validations are needed for form items? (form number format, duplicate forms, etc.)
- Any feedback on the IDP process? Specifically, around scenarios where this might be difficult or not work.

Rate/Rule Schedule Tab



- Does the order of the rate/rule schedule items matter? If so, why?
- What should there be a default order for rate/rule schedule items? If so, what?
- Are there any rate/rule schedule item data elements that should be added?
- Are there any changes to the rate data needed?

Reopened Filings

- **When are filings reopened for minor changes?**

- **When are filings reopened for major changes or a full review?**

Q&A

- Is automatic fee calculation included in the project?
  - Yes
- Is the Compare Attachments feature working?
  - Yes
- How soon will you be able to provide regulators with the templates for checklists for policy forms?
  - We are just starting to dig into this feature, so we do not have a timeline yet.
- Will machine learning compliance reviews be available for rates & rules as well as policy forms?
  - Yes
- Could the readability score section only populate if it is required by the state?
  - Yes, we are looking at this as a potential business rule. We are also looking at validating readability thresholds when applicable.
- Will you have the option to not use the IDP feature for form schedule items?
  - Probably not. Filers will be able to correct any data that is identified incorrectly, and we anticipate the regulators finding a lot of value in this process.

2023 Call Dates

- May 17
- June 21
- July 19
- August 23
- September 20
- October 18
- November 15
- December 13

April 2023 PSC Meeting

19 - 19 Apr 2023

Poll results

Multiple-choice poll

Participant Info (1/2)

101

What type of SERFF user are you?

Regulator

40 %

Industry

55 %

Other

5 %

slido

Multiple-choice poll

Participant Info (2/2)

1 0 1

How often do you use SERFF?

Daily

88 %

Weekly

7 %

Once a month or less

5 %

slido

Multiple-choice poll

NAIC

Does the order of the form schedule items matter?

0 9 3

Yes

54 %

No

46 %

slido

NAIC

Why does the order of the form schedule items matter?

(1/10)

0 6 7

- Easy to find forms when there ar a lot
- Also, PCF should always be first, and Dec would be next, then all endorsements should be in order (alpha/numeric).
- May like to reorder to look to see if there are any duplicate forms numbers as this is not acceptable at the state level.
- For ease of regulator review, it is nice but NOT necessary to have them presented in an "expected" order, especially when lots of items. For example, policy or coverage form near applicable dec then all applicable endorsements to that policy or coverage form , with state amendatory as last item.
- It's not uncommon for us to submit filings with over 100 forms, if the forms appear in order of the form number on the Forms Schedule, it's visually cleaner to review and it's also easier to identify if a form has been inadvertently missed. That's just one example.
- -

Open text poll

Why does the order of the form schedule items matter?

(2/10)

0 6 7

- I believe filers prefer to organize forms by type and significance and the order may also align with the order in other in-house tracking tools.
- defer to group
- For ease of reviewing to make sure all forms are attached and accounted for at time of submission.
- would make it easier to find required forms such as state amendatory endorsements if they are always last
- in a filing with a long listing of forms to easily be able to find one if they are ordered the way you are working with them outside of SERFF
- The order may only matter to the industry as they are setting up their filing for submission; so they may want to reorder prior to submission. It is not important to the state after submission. If it

slido

NAIC

Why does the order of the form schedule items matter?
(3/10)

067

were reordered it may cause issues with our back office system since the order is downloaded at submission but we would need to revamp our system to accept the same order as in the SERFF filing.

- Makes finding forms easier. Based either on form number or form type (PCF, DEC, ABE)
- Just like in the alphabet, we should starting out with small number; it is also easily to identify the form.
- We need to order to be by form number.

If we add a form number after the initial draft, we would like the new form to be in the correct number order.

- Some states object to the order of the forms if they do not match the forms list we attach as a document.
- We like to keep the form schedule in a particular order because it helps with our organization of the forms.
- When reviewing forms, it is important to review the main form before

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Why does the order of the form schedule items matter?

(4/10)

067

reviewing endorsements that modify that form. It is also helpful to have the state amendatory endorsements in a place that they can easily be located if there is a large number of forms.

- Order allows ease of viewing and comparing with other docs in the filing (i.e., Form Transmittal, memo, etc.). Also nice to have numerical order for larger forms filings to locate.
- Nice to have the filing outline and explanatory memorandum up front- then the granular details
- It might matter a little when regulators refer to schedule item numbers in their correspondence.
- It should be logical but no specific order as it will vary filing by filing.
- Our preference is for the forms schedule to match our internal documentation and our filing description. Sometimes these items change a bit before submission and it would be nice to easily reorder the forms on the schedule.
- ..

Open text poll

Why does the order of the form schedule items matter?

(5/10)

0 6 7

- 1. Research purposes 2. If excessive amount of forms, it can be used for validation
- For a policy/rider filing, we would want the policy first, followed by the riders. Keeping them in the same order between various states makes it easier to track that nothing was forgotten.
- Because certain states can be particular. The Forms Schedule might have to match the forms listing that's also submitted. The issue is state requirements vary and might even depend on the state reviewer.
- Like to keep the type of forms grouped together. Usually try to follow the same order as the Form Description.
- Teams think this is important that policies are listed first. then endorsements/riders.
- When having to revise a form it's easier to find if in order especially when you have a lot of forms entered.

Open text poll

Why does the order of the form schedule items matter?
(6/10)

0 6 7

- doesn't matter
- Organization purposes, to know if I'm missing attaching a form in the sequence, to easily spot a form for any reason.
- Should match the order of the form attachments. Easier to review, especially on large filings.
- It matters only for organizational and presentation purposes. In terms of review and approval it is not relevant.
- In CA it must match the order on the PARA. It also makes it easier to check that all the forms are there and the appropriate CW forms are replace with state specific forms when required
- when there are many forms, alfa, numeric is much easier to follow.
- An expected order can facilitate the regulator's review of the filing.
- When many forms are submitted it helps to keep the forms that go together next to each other.
- It can show which forms go together, i.e. policy, riders then app or enrollment

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Why does the order of the form schedule items matter?

(7/10)

067

form. Makes it more clear to the analyst the intent of the filing.

- Easier to keep track of attachments if we can load them in form number sequence order.
- For neatness and ease of view to ensure you have everything you need. I will say CA has objected to the order before.
- You can put more closely aligned form together.
- Needs to be alpha-numerically listed with the first form used as the lead form number.
- To match up with our review process on our side for filings. We like them to be in alpha-numeric order.
- Easy to locate. And also we correspond the order on how it is described/numbered on the Filing Description.
- The order in which the requirements listed, does not matter. Under each category, try to keep same order has form tabs order for reviewer.
- Sometimes state amendatory endorsements are listed last to

Why does the order of the form schedule items matter?

(8/10)

0 6 7

make them easier for the reviewer to find.

- Numerical order makes it easier to find a specific form in the list
- It matters if the carrier or regulator would like similar forms grouped together for ease of review.
- Easier to find a form when researching later and scanning the forms tab
- For CA, should match the forms tab 9 on the prior rate app
- We will hear from product team members that the forms

are easier to find if filed in their desired order.

- Policy forms should be listed first.
- It can be helpful to locate forms easier if forms in number order on large form schedules.
- Helps you know if you have added all the correct forms. Some states require they be entered numerically.
- some states require that we (industry) provide a Forms List document and it must match the Form Schedule tab.
- order of form schedule

Why does the order of the form schedule items matter?

(9/10)

067

matching up with memo makes it easier for reviewer

- I have a preference, but it does not ultimately matter to the review.
- I believe it should be in a logical order. policy, cert, rider, application, etc...
- easier to sort and view to ensure all forms being added for filing.
- N/A
- helpful to make sure you didn't miss a form.
- we want forms listed in numerical order
- It does not matter to me.
- Forms memorandum presents the forms in the same order as the form schedule making it easier for the review to complete their review. We generally provide the forms in form number order on the forms schedule.
- States have requested
- It assists in the review of the filing.
- n/a
- N/A

Open text poll

Why does the order of the form schedule items matter?

(10/10)

0 6 7

- n/a
- NA

slido

Multiple-choice poll

When are you putting the form schedule items in the correct order?

0 6 0

I add my form schedule items in the correct order.

80 %

I reorder as I'm adding form schedule items.

7 %

I reorder after I am finished adding form schedule items.

13 %

slido

Open text poll

NAIC

What should the default order be for form schedule items?

(1/7)

067

- Ahpha/numeric , but PCF, DEC, APP should be ordered first.
- ie refine or expand Form Type Legend to help sort
- Company specific
- policy, certificate, rider or endorsement, applications; or contract, 1st amendment 2nd amendment, 3rd amendment; or policy, dec pages, amendment or endorsement, application. This depends on the type of filing as out of state only has to submit certificates with nothing else
- Would be nice to have the option to select that before you start uploading.
- If there's a forms list on supporting doc tab, attach in same order. If there's not a forms list, then in an order that seems to make sense. Always odd when an "unrelated" endorsement is popped in the middle of a list.
- same types of forms together
- For a forms filing: policy, certificate, schedule pages(if separate), riders, amendments, endorsements then SOV's if required.

What should the default order be for form schedule items?

(2/7)

067

- DEC, PCF, ABE, Endt
- We typically do policy, application, specifications pages, rider/endorsement
- Depends on filing. If it was implementation filing (or big filing) I would say 1) Policy Forms, 2) Endorsements, 3)Decs, 4) Applications, 5) Other Forms
- For A&H filings - Policy, Certificate, Schedule Pages, Rider, Application/Enrollment Forms, Other Items
- In most cases, the default order would be by Form Number. Note: Depending on the number of forms and states where the filing will be submitted, we will utilize a template to add the forms to the Forms Schedule.
- Alphabetical / Numerical (Still providing option to customize.)
- It would depend on the types of Forms ie Policy, Endorsement, Notice, Dec Page so you may need additional categories to apply to the Form description to automatically sort appropratlly
- As long as all forms and

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What should the default order be for form schedule items?

(3/7)

067

explanatory memorandum are first- providing the general overview, it's fine. Second is the granular detail

- If multiple forms: Contracts, schedule pages, riders/endorsements/amendments, rider specs, applications.
- Coverage Form First, followed by other forms and coverages that are used with the product all within form number order.
- Policy forms, followed by state amendatory endorsement, general endorsements, decalarations/schedules/notices.
- Forms: PCF, DEC, ABE, END Rates/Rules: Rates then Rules
- For policy submissions, policy first, then riders, then any amendments. For other forms, usually the lowest number first (for example, L-12, L-13, L-14, etc.). Basically, what we consider the "main" form first.
- Default would be order entered which matches the order our team is provided the information.

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What should the default order be for form schedule items?
(4/7)

0 6 7

- Usually we like to see Policy first, then endorsement/rider. If just adding to a policy refer to that in your filing.
- For a policy filing with all the need forms: Policy Spec Pages Benefits/Amendments Applications Supplemental Applications
- It would depend on the type of filing and the types of forms. I do not think this should be automated for us.
- that's a tough one...as it can depend from filing to filing what forms you are submitting
- In form number order, such as 80-02-1000, 80-02-1001, 80-02-1002, etc....
- Base policy Endorsements State Amendatory Endorsements
- depends on forms list
- Depends on type of filing. Maybe by form type?
- Numerically in order by form number
- Contract/Policy Certificate of Coverage Riders Applications/Enrollment forms

What should the default order be for form schedule items?
(5/7)

0 6 7

- varies, sometimes title or form number, sometimes types of coverage.
- It would be nice that the policy form be first, followed by the declaration pages and schedules and then the endorsements. However, I defer to the industry on this one.
- -
- Alphabetical and numeric, low to high, based on form number
- Alphabetical
- alphabetical/numerical
- Alpha and numeric, most of the time, depends on type of filing.
- Primarily- Alphabetical Secondary- Numerical
- Required forms first, then endorsements
- base policy, endorsements, schedules
- Numerical or Alpha, depending on how your forms are labeled
- PCF, DEC, APP, END
- New, Amended, Withdrawn
- policy, cert, riders, applications, enrollment forms, other forms
- Would depend on type of filing

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What should the default order be for form schedule items?
(6/7)

0 6 7

- Alphabetical order
- Alpha-Numeric
- By Form Number
- Alphabetical, based on the name
- Policies forms and decs first, then endorsements in alphabetical numerical.
- policy/contract, certificate, riders, apps, disclosures
- ..
- It depends on the type of filing.
- Form number order.
- same as the form schedule order for the forms
- NA
- numerical
- form number prefix alpha
- Numerically by form number.
- The same order as the attached forms.
- Default should be the order forms are entered.
- Alpha-Numeric
- PCF, DEC, END, Other
- Number order
- ...
- By form number.
- by form number

Open text poll

What should the default order be for form schedule items?
(7/7)

067

- numerical
- form number

slido

Open text poll

What is the lead form number used for?
(1/3)

036

- While this is a L&H question, I do have a comment re: P&C in that we often will get endorsements & we don't know what policy that are applicable to & when the policy was filed. It would be nice to have some field or ability for insurer to provide them information without us having to send an obj. Only sometimes do insurers tell us in description these endorsements are used with form XXX filed in SERFF YYY
- When referring to a particular SERFF filing within company, document electronic filing or with reviewers (the MAIN policy, usually).
- It is clear by the responses that not many know what this is or its purpose.
- not sure
- To indicate the master policy number. On our rate filings, we use it to show the associated form series.
- We track the "lead form" as the primary form and track the status tied to that form in overall filing

slido

Open text poll

What is the lead form number used for?
(2/3)

036

project reporting. In a Life product filing, for example, we would flag the base policy form number as the lead form.

- N/A P&C only
- We don't really use it for anything. We just input something because the field is there.
- Depends on the filing but often it is the project name for company tracking.
- It mimics our internal tracking system.
- .
- We do not use the lead form number field.
- if we can affiliate it with a SERFF filing# but others say lead form number.
- For us, it is the main form in the project.
- For us, this is the "main" form being submitted. We use this to track our approvals after the fact.
- n/a to my use
- N/A
- We have no clue what this is used for; our state does not use it. New filers have no clue what to put in this field.

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What is the lead form number used for?

(3/3)

0 3 6

- I only do P&C
- Not familiar with this concept (P&C)
- N/A
- Line of business
- I don't know.
- I always use the policy number.
- not always used but could refer to the coverage form
- Coverage or Program.
- ?
- to identify the related policy
- Nothing.
- -
- Tracking, searching, reporting.
- N/A
- What is a Lead form number?
- Main policy form
- ..
- I have no idea.
- ...

Open text poll

NAIC

How do you choose which form to use as the lead form number?

(1/3)

0 3 4

- It depends what is being filed - For Example - Contract and rider etc. - I'll choose the contract as the lead form - Amendments & riders I'll leave the lead form blank.
- .
- It is the main form of a project. For example, a policy or part I application, both of which can be used with many different forms.
- Usually the main form number that describes the filing for us internally (or first on the list provided to us).
- Either the base policy being filed or the first number numerically in the group of forms being submitted.
- based on the main form of the filing.
- It's the primary or main form being filed that's critical to the project. In the case of a new life product, it would typically be the base policy form number.
- Policy (if filed), then dec, application, endorsements, notices
- Depends on the type of filing.

Open text poll

NAIC

How do you choose which form to use as the lead form number?

(2/3)

0 3 4

May be our internal partners, or the filers as the filing is created and set up.

- It's either the for number for the main policy or for advertising we put them in numerical order.
- If used, it may be the base policy/base certificate being filed. It may just be the first form uploaded. This field doesn't mean much to us internally.
- Policy/contract number if part of the filing or the first form listed in the Filing Description.
- NA
- Always is the policy number, if policy not included, the main form number of filing.
- What is the definition of a lead form number?
- ..
- Always the group policy form number, then et al. or the individual policy form number, then et al.
- That would be filers choice
- The master group policy number.
- Good question, don't know, and we don't know what to tell new filers when they ask.

Open text poll

How do you choose which form to use as the lead form number?

(3/3)

0 3 4

- N/A
- I only do P&C
- N/A
- Alpha-numerically
- The first form listed on the Form Schedule tab.
- .
- n/a
- N/A
- n/a
- Usually it is the base policy form.
- N/A
- -
- N/A
- ...

slido

Open text poll

Are there any form schedule data elements that should be added?

(1/4)

0 4 6

- Determine the difference between the full replacement or of a form and what is a revised form.
- if it's a policy form some link to the complete policy manual
- State Requirements for Readability Score.
- From a regulators perspective, we would like to be able to add instructions related to form filings on this tab. But that's not really new data to capture. More of functionality we would like to have. - Tina Nacy (MI)
- Great question, but, I need to think about this further and discuss with staff. Can we provide feedback to you at a later date?
- None that I can think of.
- Some states require more than one form to be attached meaning adding the comparison to that field so it needs to stay adaptable to more than one attachment
- some states also require redline mockups to be attached to form schedule as well.
- Some states want the first sentence or different

Are there any form schedule data elements that should be added?

(2/4)

0 4 6

things as the name of the doc.

- would like a withdrawal option.
- If it is able to read the form name, number and edition would it also be able to populate the most recent prior filing?
- .
- .
- Previous form number and edition date and previous SERFF tracking number.
- .
- new vs revision
- no
- allow only one form be attached to each item number
- Can the IDP also find the last time this form was approved and add that SERFF Tracking Number in the Previous Filing Number and Replaced Form Number fields?
- readability score?
- Action, Action Specific Data
- not that i can think of
- When the form number is extracted can the system search for that form number in that state in prior

Are there any form schedule data elements that should be added?

(3/4)

filings in an attempt to find the prior filing for that form that could be validated by the user?

- Information on Replacement of prior forms including edition dates
- mandatory/optional
- Previous Filing # to all action types should be required, not optional.
- Under the Action tab, is withdrawn one of the choices?
- I can't think of any.
- ..
- Alert on missing a form that should be attached.
- n/a
- I can't think of any at this time.
- can't think of any
- Is there a test version of SERFF that users are working on?
- No
- nothing comes to mind. Looks comprehensive
- No
- None I can think of.
- Don't believe so.
- previous State Tracking Numbers or SERFF Tracking Numbers

Open text poll

Are there any form schedule data elements that should be added?

(4/4)

0 4 6

- .
- no the necessary items are already on the form schedule
- Not at this time.
- final format vs mocked-up versions
- -
- No
- ?
- I can't think of any right now.
- Additional Form Types could be useful. I know we've run into situations where nothing really fit and we had to us "OTH."
- If possible, readability score
- No
- ...
- No

slido

Open text poll

Are there any additional validations needed for form schedule items?

(1/6)

050

- Make sure it has the right attachment
- Spelling and grammar review
- Just duplicate form number. we can't request specific format, because the format may vary by product and line of business. This is because of mergers and acquisitions our company has done, we have multiple formats. We typically don't change the format of an existing form for companies we've acquired.
- we accept alpha prefix for form which identify type of coverage, if the company does not include a type of coverage within the form/endorsement.
- Add an option to withdraw a form from review.
- Occassionally an insurer will have two schedule items with different form # typed but identical specimen. The IDP will be great to keep the # & specimen in sync. As an added check, could system confirm

slido

Are there any additional validations needed for form schedule items?

(2/6)

050

no duplication of form # within the same filing, which might help user confirm they attached all they mean to attach. So if expect to attach 100 they did as opposed to 99 and one appeared twice.

- .
- I also would love to have it handle the readability score.
- No duplicate forms, form number in Form Schedule should match the form number in the lower left-hand corner of the first page of the form
- check for page number errors
- Unique form numbers Forms cannot have duplicate form numbers
- None that I can think of.
- Form number on every page, correct pagination, are there brackets or fillable items in the form that would require a statement of variability,
- Make sure it can identify the form form number and edition date. This information is not always located in the same areas of a form.
- Flag if your form number doesn't

NAIC

Are there any additional validations needed for form schedule items?

(3/6)

match the form number field.

- Not that I can think of right now
- (1) unique form number, (2) one attachment per schedule item, (3) form number is located in lower left-hand corner, (4) readability score is 45 or greater
- Whether duplicate form numbers exist in the Form number column; if action specific data information is provided of another SERFF filing it might need to be the same TOI/Sub-TOI as the current filing
- forms and edition date need to be combined. must be unique and not duplicate of another form on LAH side.
- Verification that the previous filing was approved, withdrawn, etc.
- ..
- .
- duplicate titles form numbers etc
- Duplicate forms form numbers
- form type compared to title on form document itself, meaning you used rider form type, does the form say life insurance policy instead?

Open text poll

NAIC

Are there any additional validations needed for form schedule items?

(4/6)

0 5 0

- no
- .
- some states require a unique way to enter form number and edition dates.
- I'm curious if it will calculate the Readability.
- Duplicates/unique form #
- readability score standards (by state) with ability to override...for example in KY, we accept no score for officer signed certification.
- Verification of Readability Score added for certain TOI/Sub-TOI combos related to P&C personal lines
- Duplicate form numbers.
- page number can help identify filing type for validating possibly
- Form number entered in the Form schedule must match exactly to the form number on the form.
- The ones you have mentioned are great. Can't think of any others.
- Format of Form name field does not actually match the form name for NY life filings - how would that work?

slido

Open text poll

Are there any additional validations needed for form schedule items?

(5/6)

050

- unique form number
- N/A
- NA
- Make sure the filing type is correct. Not all policy forms say they are a "policy form."
- Should there be an alert for filenames that do not work in SERFF? Current issue - states have indicated that they can not open filenames with commas in them.
- Unique forms numbers by line of business
- Correlated to Product Name
- Some require form number and page number on each page of document.
- ...
- none that you aren't aware of
- No
- .
- No
- Make sure no duplicate forms attached
- duplicates would be nice. Format of form number
- No
- form number field matches form number on form

Open text poll

Are there any additional validations needed for form schedule items?

(6/6)

0 5 0

- Duplicate forms would be good
- spell check
- -
- No.
- ...

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Open text poll

NAIC

Any other feedback for the IDP workflow?
(1/6)

0 5 0

- .
- If errors still get thru, such as user not correcting what IDP thought it read or saw, would appreciate cleaner, easier way to get corrections from industry, such as a PSU as opposed to an uglier looking superseding process.
- How will this work with Annual form filings?
- A state that requires the Ed. date in the form number field - is that something that we would just correct, or will it know that specific state requirement and enter it that way for us?
- How will it know its a replacement or new?
- Will this work in the Templates tab as well?
- We spend time checking form numbers on the schedule item versus the attachment so that extraction would be helpful. Our current back office system

Any other feedback for the IDP workflow?

(2/6)

050

flags when they do not match but it runs into issues with spacing differences. The extra validations would save time on intake for regulators.

- If there's a way for the previous filing # to be automatically identified based on the Form Number, that would be helpful.
- Limit the attachment of forms to one PDF per form count item.
- I think the upload process will be extremely helpful, especially for filings with a large number of forms. Also, I'm hoping this feature will be available with Forms Templates.
- Will it show a previous version like the current SERFF?
- None at this time. I think this feature will be beneficial especially if we can batch everything without having to create templates.
- Not sure if mentioned, but can it provide the prior form number filed and approved
- Can the results of the IDP workflow be added to templates?

Open text poll

Any other feedback for the IDP workflow?

(3/6)

050

- Determining the classification type of form for P&C would be difficult as some endorsements are coverage endorsements which are similar style as policies
- Could there be a plugin which showed redline of changes?
- For those users (or states that require) comparisons attached to form schedule, will IDP know which one to read to fill in fields? Don't want it reading the old/redline version & populating incorrect info
- I would want to see it in action first to see how and what it pulls from where before determining when scenarios may be problematic.
- No
- .
- Not at this time.
- flesch scoring application would be nice along with minimum score required by state
- Another concern is if the system uploads a form as incorrect filing type.
- The intelligent document processing may cause more work for the industry to

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Any other feedback for the IDP workflow?

(4/6)

0 5 0

review and correct if the IDP does not identify elements properly.

- No concerns right now. I could see this being very helpful especially if we can make corrections afterwards if needed.
- Will the IDP workflow work across file types or is it limited still to only PDF?
- Would like the ability to delete a from completely from schedule when it is determined later that it will not apply after a state objection.
- Will the uploaded file(s) need to be a PDF copy for the IDP to work?
- We don't use edition date but use a type of filing number in that field that states accept. Will the IDP be able to adapt to that or would that generate errors if it doesn't find an actual date. Our date is in the copyright section.
- Being able to hide fields for which there is no state requirement
- we try and use ISO form standards to apply for independent forms
- No
- No

Open text poll

Any other feedback for the IDP workflow?

(5/6)

0 5 0

- .
- Emphasis on user review and correct
- None here.
- Curious to see a demo of loading forms, machines reading form numbers and edition dates, etc.
- no
- There are exceptions to every rule. This is okay as long as the user can override and make corrections without the system having a breakdown.
- OR and WA deviate as to how the form schedule is completed.
- Will it show if it was approved or disapproved in a previous filing?
- I can great benefit on some filings, for us, advertisements might be a bit more challenging.
- No concerns.
- A drag and drop feature may be nice.
- NA
- I think as long as we can still edit the fields, I have no concerns.
- no issue as long as there is flexibility for industry users to edit the populated info
- Not at this time.

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Any other feedback for the IDP workflow?
(6/6)

0 5 0

- if it get 90% of the info correct it will be worth it
- A concern is uploading various forms in one Item number. We require one attachment per item number.
- Will this process be able to compute the flesch score?
- none
- ...
- .
- No
- .
- -------------

Multiple-choice poll

NAIC

Does the order of the rate/rule schedule items matter?

0 7 6

Yes

30 %

No

70 %

Open text poll

Why does the order of the rate/rule schedule items matter?

(1/4)

0 4 5

- NA
- Much easier to track forms, it's logical, it's consistent with all of the same filings.
- Just a logical order is best. Sometimes companies submit individual pages for revisions, and it would be nice that they are ordered the way they appear in the manual.
- .
- If multiple companies like we get in pc....as long as the rates are filed the same and we can idenitfy them by company name.
- The rates and rules need to flow in the correct order. Typically by rule number.
- It matters so the filing manual pages we submit are in order of section of the manual and easier for review. If filing combination lines, some sections have similar titles.
- Only if there are many and that would make it easier.
- Because rating must be done according to a certain order, and the rates/rules need to be

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Why does the order of the rate/rule schedule items matter?

(2/4)

045

uploaded in that same order in cases where they are not all contained within on document.

- Typically, we list the Rates first, followed by Rules
- Max change : Min change should show Min : Max ideally to match how most spreads are presented. All fields should be required and not by-passable.
- Organization of pages/ease of locating on the R/R tab for larger filings
- We would want the rates to be listed in the same order as the policies on the Form Schedule tab. If this is just a rate filing without forms, we would like them to be listed in alphabetical order by form number.
- Actuarial memo first is a nice to have
- it doesn't
- no reason, what to see answers
- It matters when filing exception pages to countrywide rules to list the C/W rule first then the applicable exception page.
- It is nice when

NAIC

Why does the order of the rate/rule schedule items matter?

(3/4)

0 4 5

order appears logical....Countrywide, then Ohio or in rule # order

- .
- Benefit in ease of locating certain exhibits
- It matters for tracking purposes and research post filing. Much easier to find the manual rate/rule page if they are in order. It would be a nightmare if they are all mixed up for us.
- Prefer to see the Rule# or Page # first then The Exhibit Name
- Should have countrywide rules, then state rules, in order to make sense.
- Same as why the Form Schedule should be alpha-numeric.
- na
- We prefer to keep our rate pages together and rule pages together when submitting
- We prefer that the schedule show the same order as our filing description.
- Some team members prefer the main rating plan first, exceptions following that document.
- makes it easy to peer

Open text poll

NAIC

Why does the order of the rate/rule schedule items matter?

(4/4)

0 4 5

review items before submission

- For states that require us to file each rule independently on the RR Schedule, when attached to the RR schedule they should be in order of the rules, i.e. Rule 1, Rule 2 .....
- .
- ..
- n/a
- .
- .
- N/A
- .
- N/A
- N/A
- N/A
- n/a
- .
- it doesnt.
- -----
- ...

Open text poll

What should the default order be for rate/rule schedule items?

(1/3)

0 3 3

- Rates, followed by rules/exceptions, and when required to file each rule separately, rule number order, when Rule numbers are assigned.
- Can the information from the prior filing, be automatically populated based on the company and line of business?
- It should be the same as the numbering of the rates/rules themselves.
- I agree with no mandated default order for manual pages.
- .
- Schedule items should only accept pdf
- Full manuals, Countrywide rules, additional rules, state specific exception pages.
- I would not be in favor of a default order being mandated
- as is now
- Life company: we usually only file rates with our initial policy filing. If we could check "initial" then skip everything about previous revisions and so on, it would be much less frustrating.
- alphabetical

Open text poll

What should the default order be for rate/rule schedule items?

(2/3)

033

- Same response as my last one. If being filed with policies - would want them in same order as policy. If just rates are being filed, would like them in alphabetic order by form number.
- We need them to be in the numeric order in which they appear in the manual. Some of our numbers start with a letter so we would want to keep each section together and then by numeric order in that section.
- N/A
- main manual first followed by any exception pages
- Rates then rules All in one manual is preferred
- .
- n/a
- No default order.
- Ordered by manual page number
- Rule number first, then Exhibit name
- Rate/Rule Manual, State Exception Pages
- I don't know.
- n/a
- alpha-numeric

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Open text poll

What should the default order be for rate/rule schedule items?

(3/3)

0 3 3

- no order for me
- Alphabetical
- ??
- .
- n/a
- n/a
- .
- ---------
- N/a
- ...

Are there any rate/rule schedule item data elements that should be added?

(1/3)

0 3 7

- %Change by Coverage (for PPA BI, PD, Coll etc) for other lines by peril. Permisible Losss Ratio, Profit, ROI. Second Rosemary's request for 6mo or Annual premium.
- usually they add rate data explanations in supporting docs.
- For the fielded data elements to be different if the filing contains an initial rate schedule vs rate change. Most of the fields are geared toward rate changes only. I don't know what options are under Rate Change Type, such as initial rate or no change?
- It's not always a rate change, so label should read Rate Filing Type or something similar. We very rarely change rates.
- some states require the prior tracking number while others do not. it would be nice if that field only showed for the states where it is required to be entered
- Again, as a regulator, we would like to

Open text poll

NAIC

Are there any rate/rule schedule item data elements that should be added?

(2/3)

037

be able to add instructions to this tab.

- A way for insurer to indicate this is a complete manual. Not always easy to determine based on page numbering convention or lack of page numbering, etc.
- An indicator if the rule being filed is an individual rule or rule page versus a full manual.
- previous rule # or page#
- some states want redlines under the schedule it would be nice to be able to call that out automatically
- ...
- Can the filing methods be a drop down by available methods for the state in question?
- no
- n/a
- .
- .
- The number of lives covered as well as the number of the policyholders.
- .
- Type of attachment perhaps? (Rate, rule...)

Are there any rate/rule schedule item data elements that should be added?

(3/3)

0 3 7

- na
- Looks fine at this time.
- .
- no
- Number of pages
- None I can think of.
- not that I can think of
- I don't believe so.
- Not that I can think of.
- None that I can think of.
- ??
- No
- .
- n/a
- .
- None
- --------
- ...

Open text poll

Are there any changes to the rate data needed?

(1/4)

0 4 1

- n/a
- .
- Add business rules for states that require the Rate Data to be mandatory for all rule only, rate/rule and rate filings.
- Add annualized written premium and annualized written premium impact.
- Number of Policies and Number of Affected Policies in the Product
- Colorado allows multiple companies in one filing. Under the Overall Rate Information for Multiple Company Filings, please allow SERFF to automatically calculate all fields including Overall Percentage Rate Indicated and the Overall Percentage Rate Impact for this filing.
- If a state doesn't want all of the info, can the sections they don't need be grayed out.
- .
- Only display the top section Filing Method, Rate Change, Etc for the states that actually require this to be completed. A lot of the

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Are there any changes to the rate data needed?

(2/4)

041

states I work w/for my LOB do not require this and it would be nice if it just was not there for those states.

- sometimes the previous filing number is a link and sometimes it is not. Why is that?
- Remove the word "Affected" form "Number of Policy Holders Affected for this Program:" Filers have different interpretations of this particular Rate Information
- clarity on when/which states require the info
- add zeros as default
- Add a place to indicate if impacts are on a capped or uncapped basis, and indicate if information is annualized or on 6 month basis.
- My prior answer was for the Rate Data Information
- Again, there isn't always a change, so asking for all of those percentages is difficult when it's an initial product filing.
- Regarding the Rate Data section - I find it very confusing. Don't know if this information is always needed. Usually have to ask the actuary for the answers to these questions.

Are there any changes to the rate data needed? (3/4)

0 4 1

- If the information appears in the actuarial memo why do filers need to fill in the premium fields? May be unnecessary.
- nothing comes to mind
- Only show Maximum and Minimum for states that require them.
- # of Policy Holders Affected for this program and # of Policy Holder Total would be ideal to see if there is a difference between those affected and those not affected.
- indicator of whether the maximum and minimum % changes are impacted by a premium capping rule
- The information from the prior filing can hopefully be auto-populated.
- no
- Only show Maximum and Minimum for states that require them.
- none
- .
- Ability to pull data from prior filing.
- The ability to put in "N/a" if that is the correct answer.

Open text poll

NAIC

Are there any changes to the rate data needed?

(4/4)

0 4 1

- .
- .
- not sure
- N/A
- Automatically pull in prior filing data
- no
- No
- no
- N/A
- No
- no
- No
- No
- -------
- none
- ...

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What are some scenarios of filings reopened for minor changes?

(1/9)

0 7 0

- Effective Dates
- Reviewer made an error on the disposition, such as incorrect form status or disposition wording
- If the filing was recently approved and the company states they have not used the forms.
- need to amend the effective date
- Changes in Statement of Variability or Actuarial Memorandum; Replacement of Disposition if original Disposition was missing something; Incorrect information provided on the Form Schedule and noted after the filing was closed
- Major change would be an additional provision or benefit added or removed based on business decisions. Minor change may be a range in an SOV change,
- Minor error found ie spelling, missing information SOV/Actuarial Memo update
- New filing was submitted but it appears to be additional information to an already

What are some scenarios of filings reopened for minor changes?

(2/9)

0 7 0

approved filing; therefore the previous filing would be re-opened and corrections made there.

- Minor changes are reopened on request. The only time we reopen for a full review is if we dispositioned the filing withdrawn awaiting model review.
- We normally do not reopen filings.
- Editorial updates to manual pages or forms. Corrections on rate/rule schedule.
- When the filing has not yet been implemented, we will request a reopen for a minor change.
- Typo corrections that do not impact the intent of the filed material, i.e. incorrect form number used on a submitted form, form content did not change, just the form number. Minor rule changes, pointing to an incorrect form for example, rule content unchanged, just the form number in which in points to...
- We do not re-open if

Open text poll

What are some scenarios of filings reopened for minor changes?

(3/9)

070

the effective has passed

- A typo was discovered in the form after approval
- Any number of reasons. If the effective dates have not passed then filing can be re-opened for changes but once the effective date is passed that would not be permissible.
- some states don't allow amendments or post submission updates. If filing needs changes to description or effective dates, we would ask to reopen filing to make these changes when amendments are not allowed.
- We are not normally reopen for full review. we also not reopen when the effective date of the filing already pass.
- When a form number has a typo, the Sub-TOI is incorrect, etc.
- spelling errors, minor editorial changes
- Typos
- We may re-open a filing if a company needs to

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Open text poll

What are some scenarios of filings reopened for minor changes?

(4/9)

070

submit forms, rates or rules with minor editorial corrections.

- correction on a rate or rule page
- minor: typographical errors Formatting errors major: Language changes
- We have a 90 day post-approval and not issue/marketed limit on reopenings in general. True typos are allowed outside of that.
- Typo discovered in form; effective date change.
- To add a document that is required to be included due to action taken on a corresponding filing that is still open. To revise a form due to a change in the form number
- Error in Form Schedule tab, i.e. form number incorrect. Typo in an approved form. Correction of a form number on the actual form. Correction to SOV. Something forgotten on the Supporting Documentation tab.
- minor correction of incorrect data or incorrect form attachment
- Typo, SOI updates, need to slightly modify a statement.

What are some scenarios of filings reopened for minor changes?
(5/9)

0 7 0

- Co has discovered typos after filing was closed. We will also reopen any closed filing for any requested reason if not yet effective.
- Changing effective dates on final printed pages, editorial corrections.
- When we realize we left a small item out in error or we discover an error that needs to be corrected=minor
- Corrections to manual pages. For example, the filer meant to file a base rate of $100 and supported a base rate of $100 in the exhibits, but accidentally filed $101 in the manual page.
- For typographical errors or other administrative issue
- To correct a manual page or form
- Something is missing from certificate of coverage or a group has requested a change that was not incorporated into the original submission for a file and use product.
- change a form number in the rules, correct and edition of a rule, grammatical errors. etc.

Open text poll

What are some scenarios of filings reopened for minor changes?

(6/9)

0 7 0

- typos
- Corrections to typos or updated effective dates that are included in the "printed" rate/rule manuals.
- typographical or punctuation errors in a document. Change of effective dates.
- typo on a form and need to correct
- When we realize a mistake was made on a form, such as a typo. For rates, similarly, we sometimes realize there's a mistake after the filing was closed that appears during testing.
- We've noticed typos after the filing is already submitted and approved.
- .
- Change in effective date
- Reopening of files is usually for minor issues - wrong cost-sharing amount entered, typo in forms, that kind of issue. We typically don't reopen files for major issues.

Open text poll

What are some scenarios of filings reopened for minor changes?

(7/9)

0 7 0

- typographical error on forms or SOV
- change effective date
- to correct like a duplicate sentence, typos, etc.
- Typos or formatting issues in filing documents.
- If filings have not been issued yet. Extension of effective date.
- You discover that an error was made on something that you submitted in a filing ie forms spelling error, date error, rate page errors, rule page errors, etc
- .
- When an Analyst hits a wrong button but also hit the submit button.
- typos in forms or rules
- effective date changes needed. Correction for typos
- To add/update filing documentation requested by the DOI.
- To correct minor typos.
- To withdraw previously approved form or forms.
- form typo
- State regulator challenges a current filing

Open text poll

What are some scenarios of filings reopened for minor changes?

(8/9)

0 7 0

- typos
- Forgot to attach a variable memo, minor variability correction, form number correction, etc.
- Company has discovered a typographical error or similar minor error, prior to implementation of form
- Effective date changes
- Typographical errors
- typos, change eff date
- ...
- .
- wrong form number
- Possible typo in form/rate/rule page
- We will reopen for typographical errors
- No experience with reopened filings.
- To change the effective date.
- The disposition letter had to be corrected.
- typographical error
- Change effective date where a few states require re-opening.
- .

Open text poll

What are some scenarios of filings reopened for minor changes?

(9/9)

0 7 0

- Typos on forms; missing endorsements.
- -
- ...

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Open text poll

What are some scenarios of filings being reopened for major changes/full review?

(1/6)

0 6 2

- Some states do not allow you to reopen.
- If there were forms that were mislabeled or misfiled under TOI/Sub-TOI. May also be the result of a filing being withdrawn altogether.
- We will reopen a submission for full review if we dispositioned it Closed - Awaiting Model Review after approval of model.
- A number of reasons. An additional benefit being added prior to effective date.

Statute change prior to effective date that may impact the product.

- N/A
- We normally do not reopen for major changes. The company would have to resubmit the filing and reference the incorrect filing. In extreme cases, we will reopen a filing to correct rates that the company stated was incorrect or for incomplete information. We rarely reopen filings.
- Company forgot a form, but still

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What are some scenarios of filings being reopened for major changes/full review?

(2/6)

062

prior to implementation of program

- Re-opening of filings for major changes is rare
- they usually aren't. Resubmissions are needed for major issues
- A design change or major correction that alters the design/mechanics.
- Filer uploaded the wrong form or rate pages. Incorrect company selected.
- .
- We don't reopen files for major issues. or full review. We would ask them to send a new file with replacement forms.
- change rate premiums in manuals or revise forms in form schedule that have incorrect info. or add actuarial support or replace support that was incorrect in original filing.
- Company withdraws the previously approved filing
- Major changes usually mean refiling. I've not heard where DOIs will reopen a filing for major changes.

Open text poll

What are some scenarios of filings being reopened for major changes/full review?

(3/6)

0 6 2

- Filing support initially provided changes the filing substantially and requires the reviewer to look at the filing again.
- We almost never re-open filings for major changes. We would require the filer to submit a new filing.
- Filing Type
- for major changes that require a full review the company is asked to file a new filing.
- Late legislation requiring regulatory updates
- Incorrect TOI, version date of policy attachment, deleting states.
- We don't allow filings to be reopened for major or even minor revisions to rates or rules; only corrections.
- Rate errors/corrections, policy language corrections, etc.
- Need to replace documents with errors on them. We must ask a state to re-open a filing and some states will refuse.
- Changes in state or federal law that requires

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What are some scenarios of filings being reopened for major changes/full review?

(4/6)

0 6 2

updates to approved filings that state has okayed.

- sometimes, they will reopen if it has been disapproved
- Usually requires a new filing, not a reopen.
- n/a ~ we refile for major changes
- Withdrawal of an approved rule/form prior to the effective date.
- If filing not yet effective, we have to reopen for amendments when asked. On occassion, the amendment is so significant it might require us sending objs.
- When actuarial data has changed since the filing was submitted.
- Change in rates that were initially filed
- Filings re-opened for outside actuarial exam.
- ...
- Removal of coverage which was not intended
- typically for major we do a new submission
- Adding additional forms that were omitted
- Major changes would probably require a new filing.

Open text poll

What are some scenarios of filings being reopened for major changes/full review?

(5/6)

- State will reopen if a filing was approved in error. We will also reopen within a week or two of approval if company requests.
- They would need to w/d first filing and refile it.
- Original filing rejected and company satisfies issues that caused the rejection. This is only done sometimes
- If we discover that a form number was incorrect on the Form Schedule tab or if a wrong PDF was uploaded to the Form Schedule Tab.
- We do not request a filing to be reopened for major changes. We would submit a new filing.
- N/A
- Disposition challenged
- We would usually submit a new filing.
- re-review by regulator
- Adding manuals to filings that we were not aware of initially
- Regulator request
- language changes
- Change in rates post submission: Add missing forms and or rules,

Open text poll

What are some scenarios of filings being reopened for major changes/full review?

(6/6)

0 6 2

- Filings accidentally approved/acknowledged by the DOI.
- Incorrect manual pages attached.
- Typos, attached wrong materials/support
- Major changes usually warrant a new filing.
- Never reopened for major changes or full review.
- This would usually require a new submission.
- We would not reopen for major changes - we would do a new filing with an updated form number.
- incorrect document attached
- States may find items that are non-compliant upon audit review.
- .
- We've never requested this.
- .
- No experience with reopened filings.
- .
- ---

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