SERFF Product Steering Committee Meeting

Wednesday, October 18

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

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Roll Call

- Roll was called for current PSC members

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

SERFF Modernization Progress Updates

Regulator Workshop – October 11 & 12

- Overall success!
- Attendees from 41 states and territories
  - Working on putting something together for the states that couldn't attend
- Activities:
  - Product Demo and Q&A
  - One-on-one consultations
  - Table topics
- Looking at March for a Compact Filer Workshop
- Currently budgeting for next year and anticipating additional opportunities
  - Will explore in-person, virtual, and hybrid options

Phase 2 – Tableau Dashboards

- More users are requesting access to Tableau
- Evaluating feedback and requests
- Will give a more in-depth presentation on Tableau at the November meeting
- If you would like access to the dashboards, email – serffuat@naic.org

Phase 3.1 - Interstate Compact

- In Progress Work:
  - Feature clean-up
- Upcoming Work:
  - Pre-submission check
  - Correspondence
  - State Fee Calculation
- Preparing for Quarterly Planning

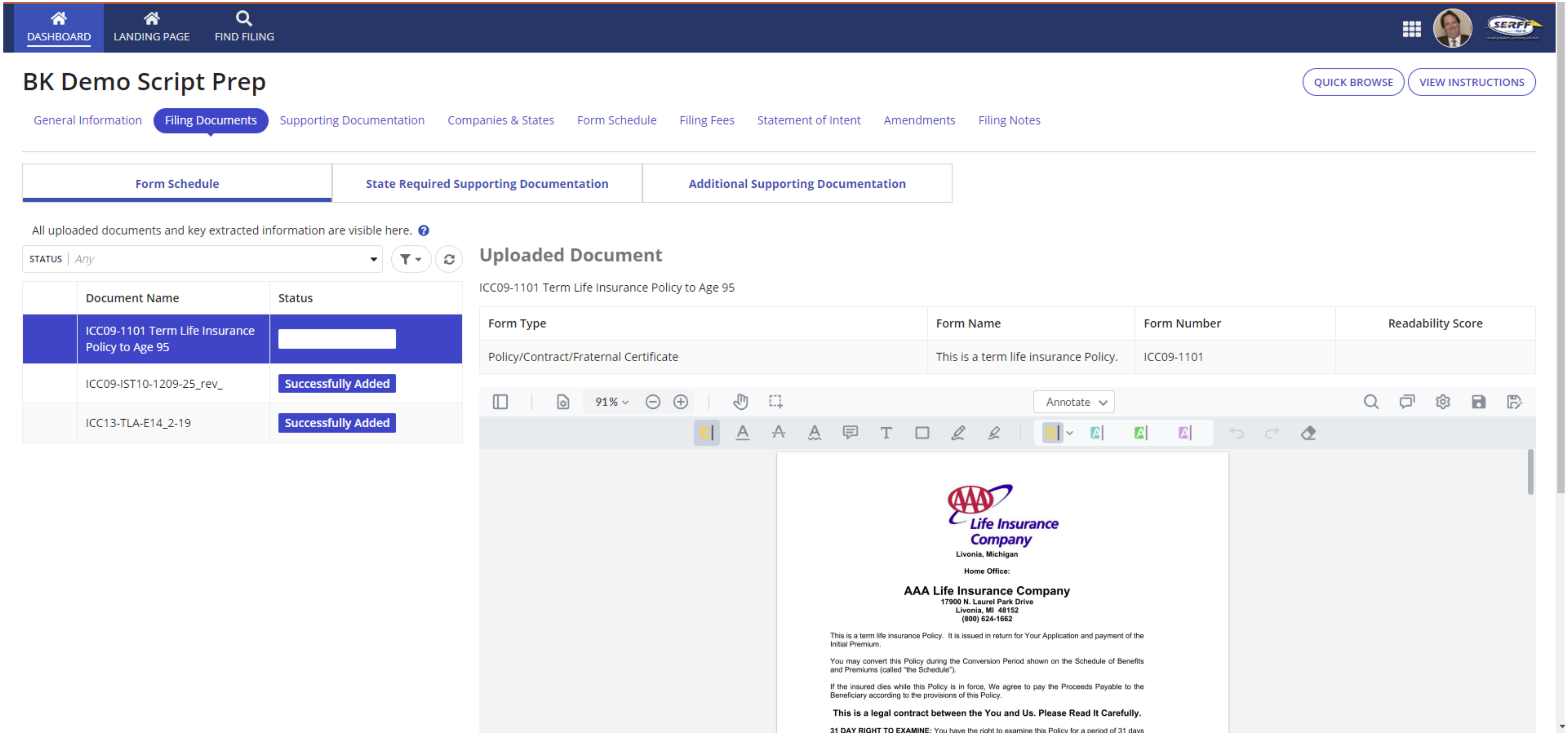
Industry Focus Group Survey

- 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 – Menti
- About 120 PSC attendees participated
- Main topics covered: Filing Documents, Pre-Submission Check, and Correspondence
- Questions from the activity are on pages 10-16
- Results from the Menti Activity start on page 18
- **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.

Filing Documents - Screenshot



Filing Documents - Questions

Description:

- We are currently discussing two possible formats for documents on a filing (Form, Rate/Rule, etc.). Both are shown in the screenshot on the previous slide.
- The first is like what exists in SERFF today, where each schedule item is its own tab on the filing.
- The second is highlighted in the screenshot, where there is one tab for 'Filing Documents' and each schedule item type is a sub-tab.

Questions:

- Which format do you prefer?
  - Separate Schedule Item tabs
  - The Filing Documents tab
  - I don't have a preference
  - I'm unsure and need to think about it more.

Pre-Submission Check

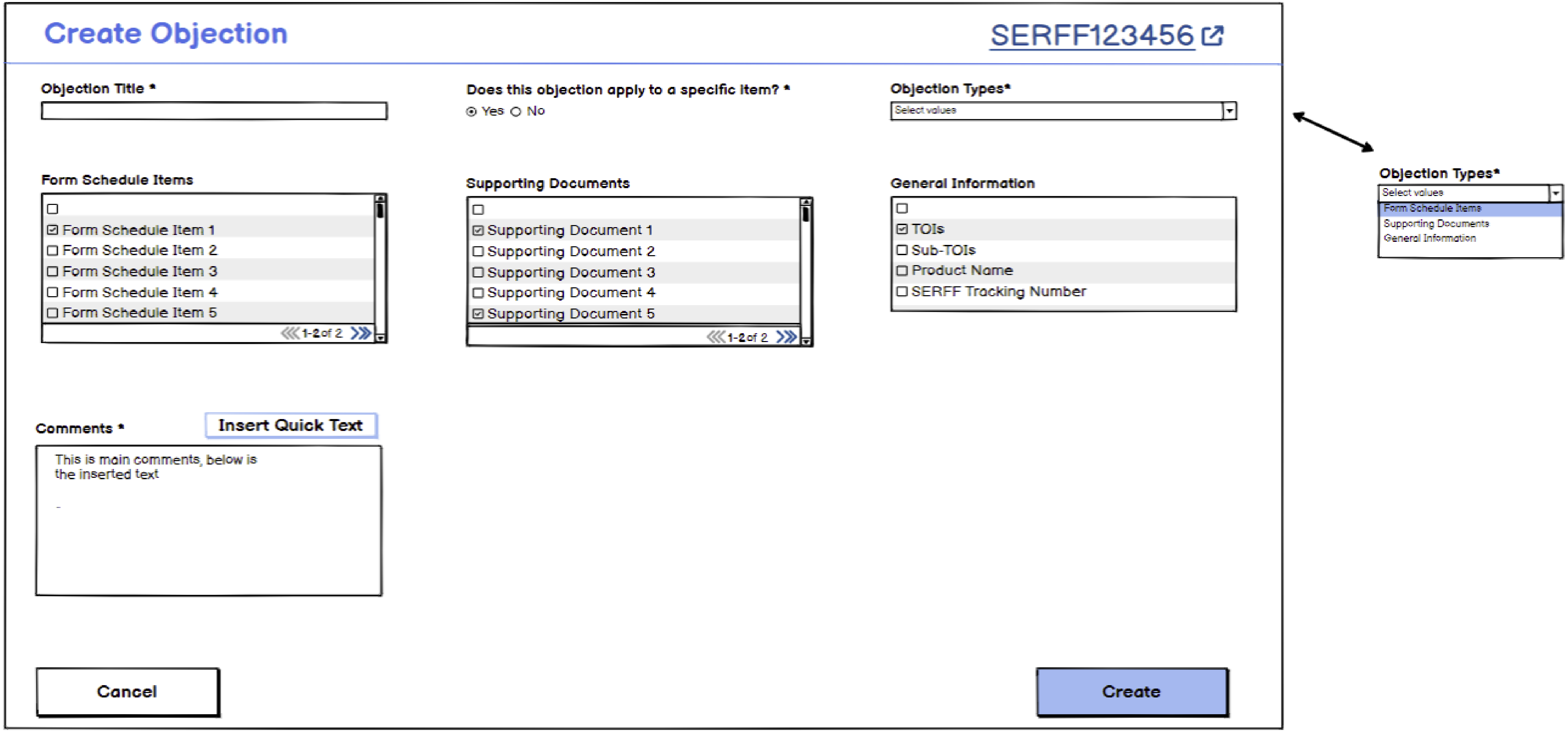
Description:

- We are implementing a new feature for industry filers called a 'Pre-Submission Check'. This will allow filers to check how ready their filing is for submission throughout the drafting process.
- The check will have two categories: errors and warnings.
- Errors exist today and are things that will stop a filing from being submitted. For example, a missing filing description.
- Warnings are new and are for things that are allowed in the system but seem wrong for the filing. Filings with warnings can still be submitted. The two warnings we are starting with are:
  - Missing forms – In the occasion that the filing type indicates forms are expected, but none have been added.
  - Excessive fees – In the occasion that any individual fee is above the threshold that seems standard for SERFF filings.

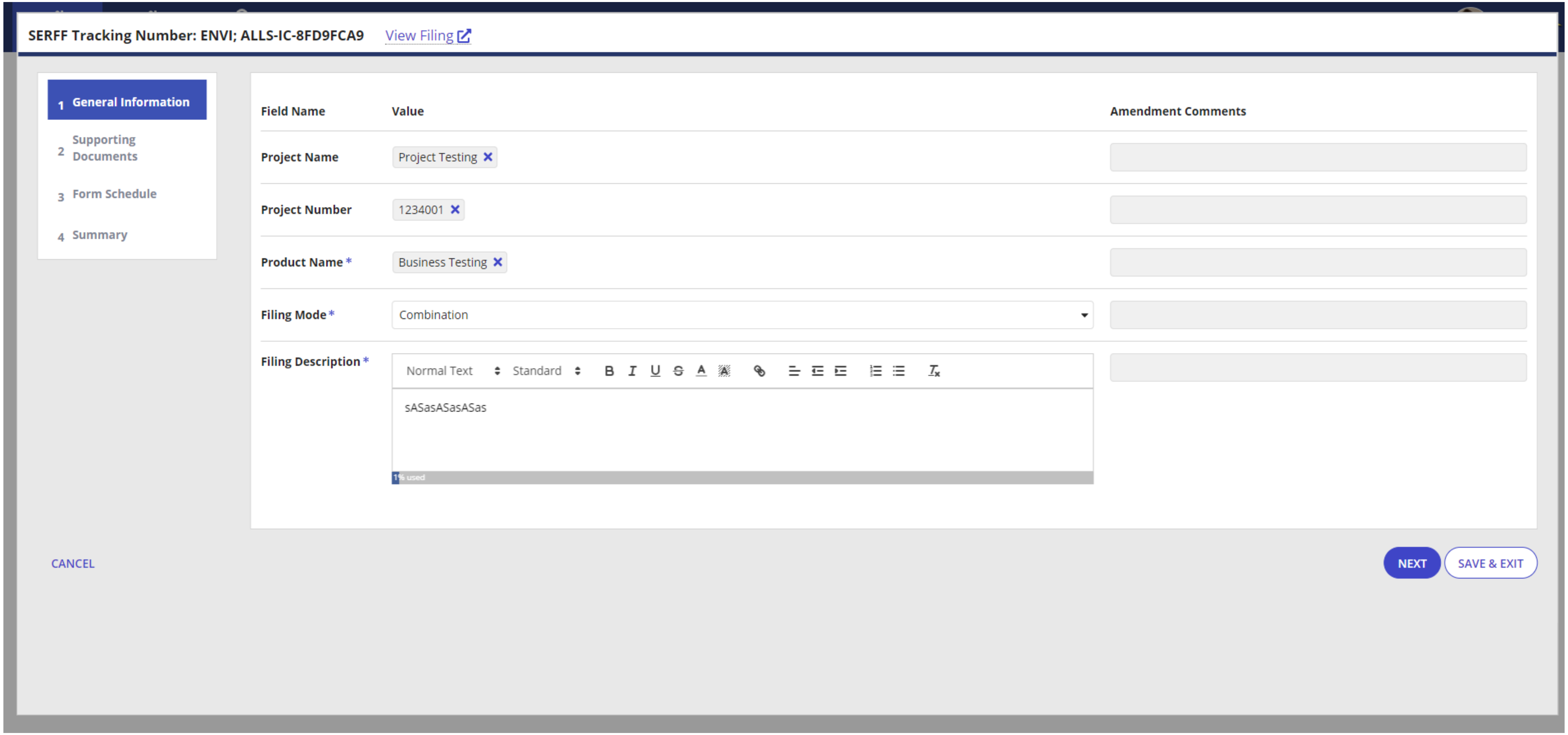
Questions:

- Besides existing SERFF submission errors, what other things should be added to the pre-submission check as an error?
- What other things should be added to the pre-submission check as a warning?

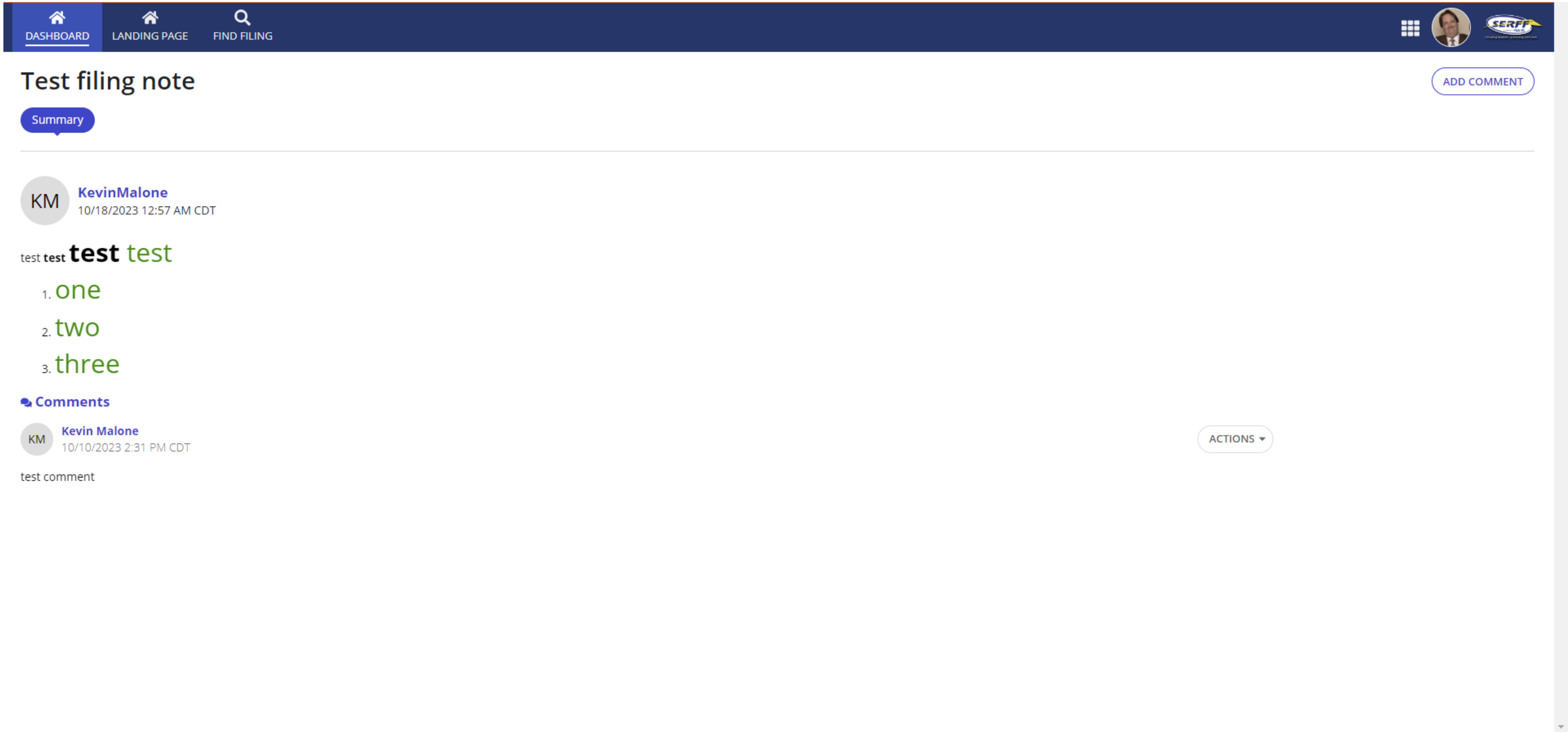
Correspondence: Objection- Mock-Up



Correspondence: Amendment- Screenshot



Correspondence: Internal Filing Note- Screenshot



Correspondence Changes - Description

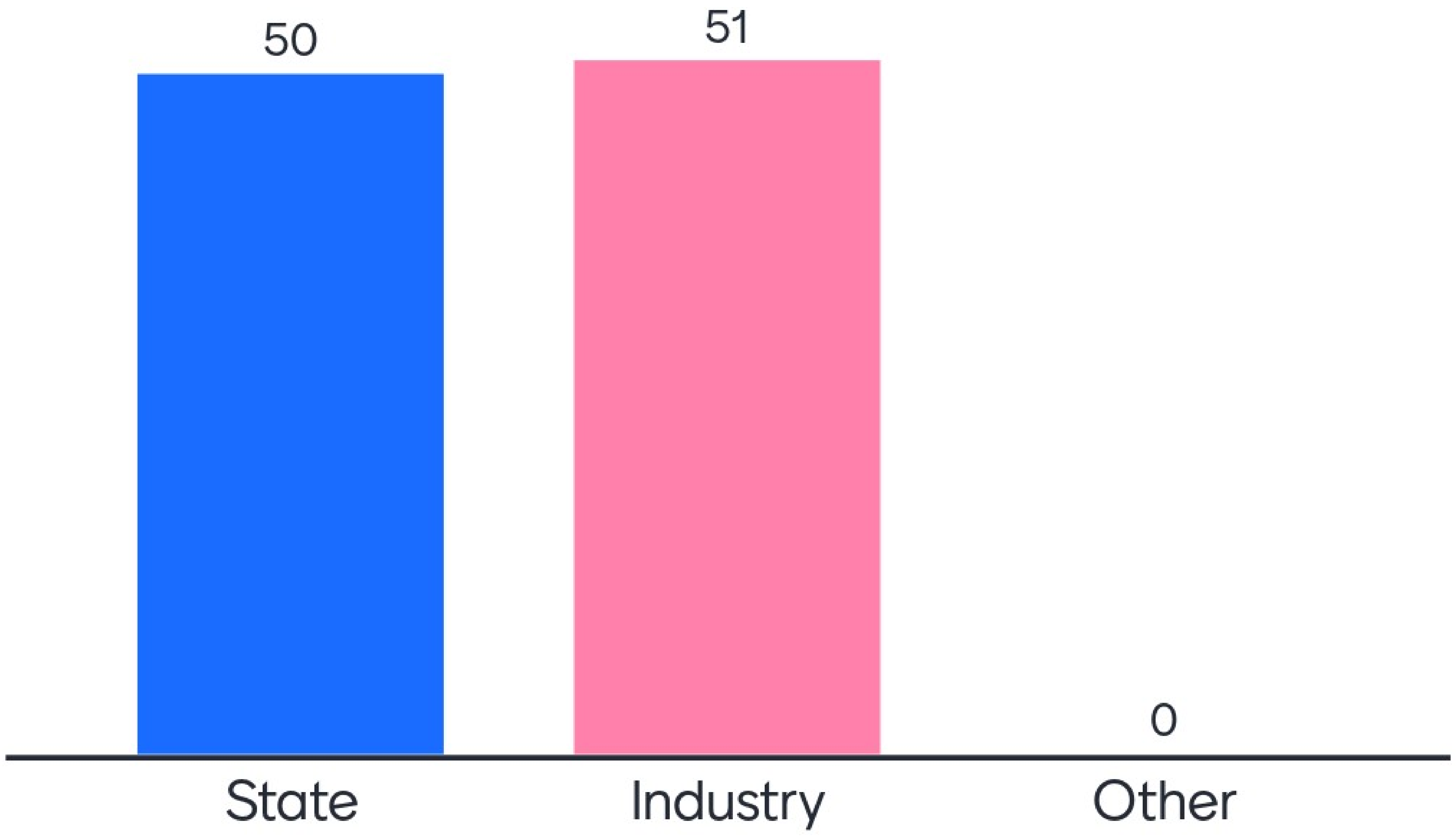
- **Objections:**
  - We are adding granularity to the objection workflow, so reviewers can indicate if an objection is related to General Information fields or fees, as well as schedule items.
- **Amendments:**
  - All filing changes post-submission will be made through an amendment workflow, rather than the 4 current workflows to make changes. (post submission update, additional EFT fees, amendment letter, and response letter)
  - Responding to an objection letter will also occur through this amendment workflow and will allow the filer to respond to objections individually, rather than requiring they respond to the entire objection letter at one time.
  - Regulators will be able to see the response status of objections on an objection letter and will be able to indicate whether a submitted change was a sufficient response to the objection without having to recreate the same objections multiple times.
- **Internal Filing Notes:**
  - Internal Filing Notes will now support richtext formatting (bold, font colors, bullet lists, etc.) and users will be able to comment on a note. We are supporting two levels of hierarchy for internal notes, so users will be able to add comments underneath a note but will not be able to thread comments underneath comments.
- **Question: What feedback or questions do you have about the correspondence changes?**

2023 Call Dates

- November 15
- December 13

October SERFF PSC

What type of user are you?



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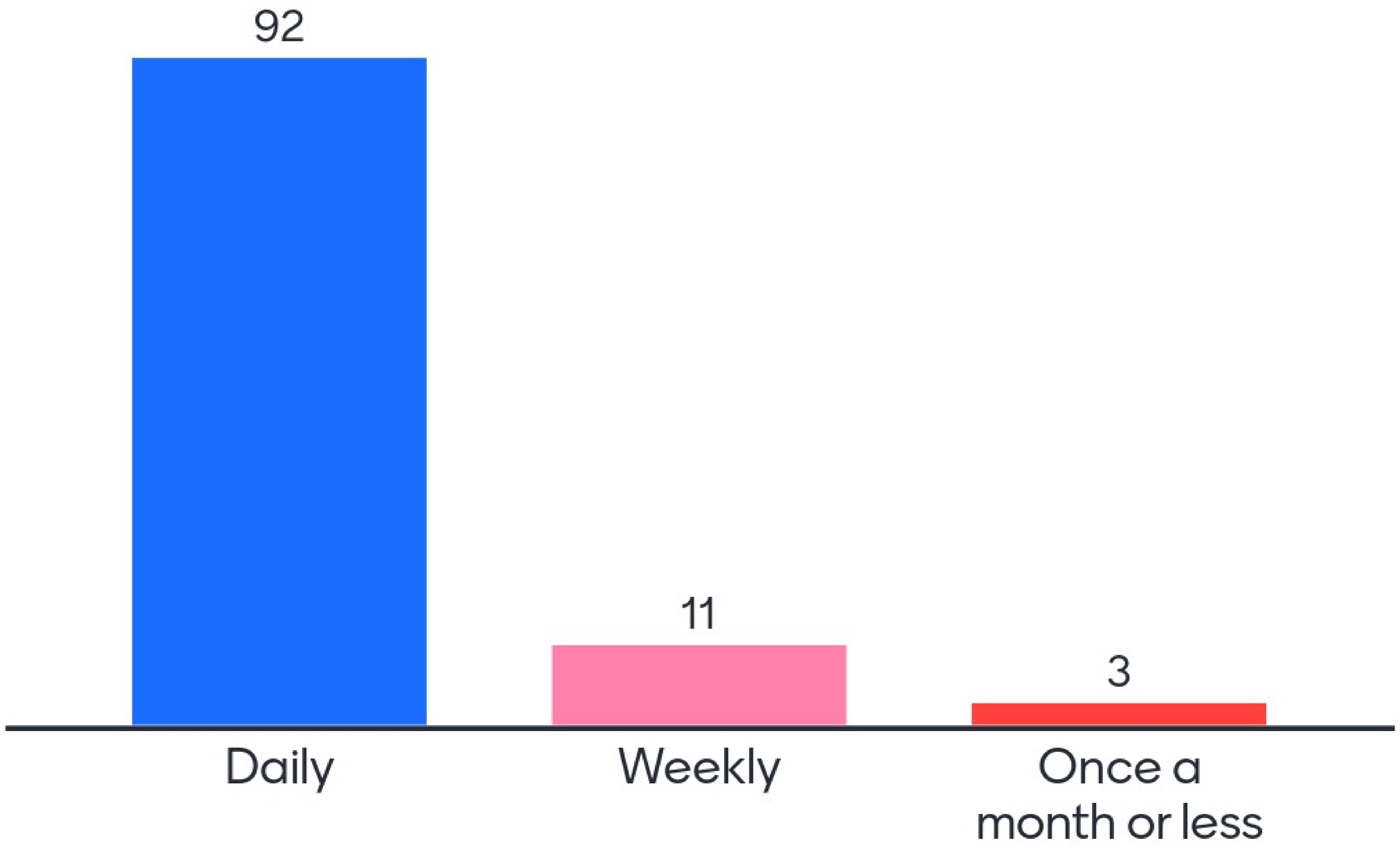
How often do you use SERFF?



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Filing Document Format

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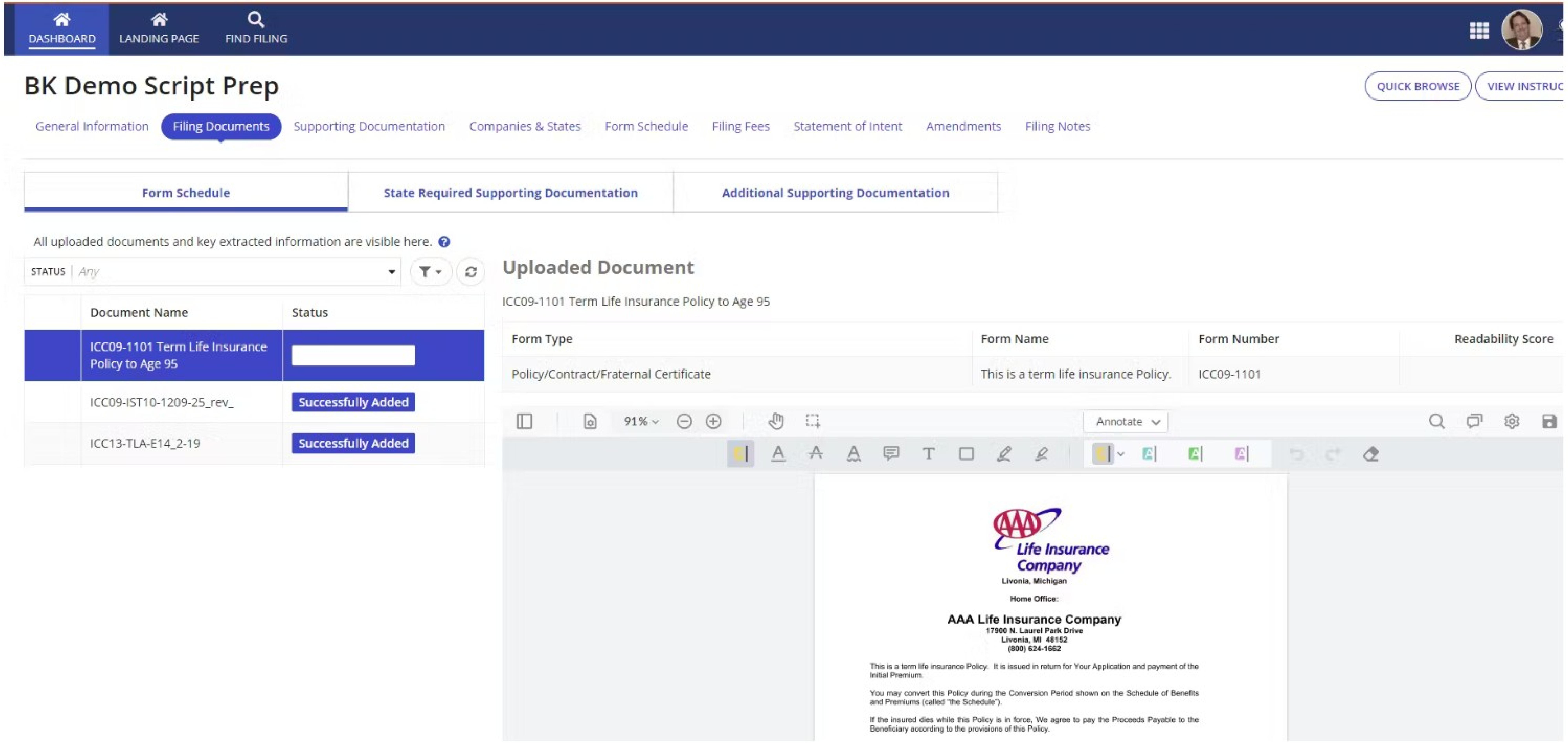

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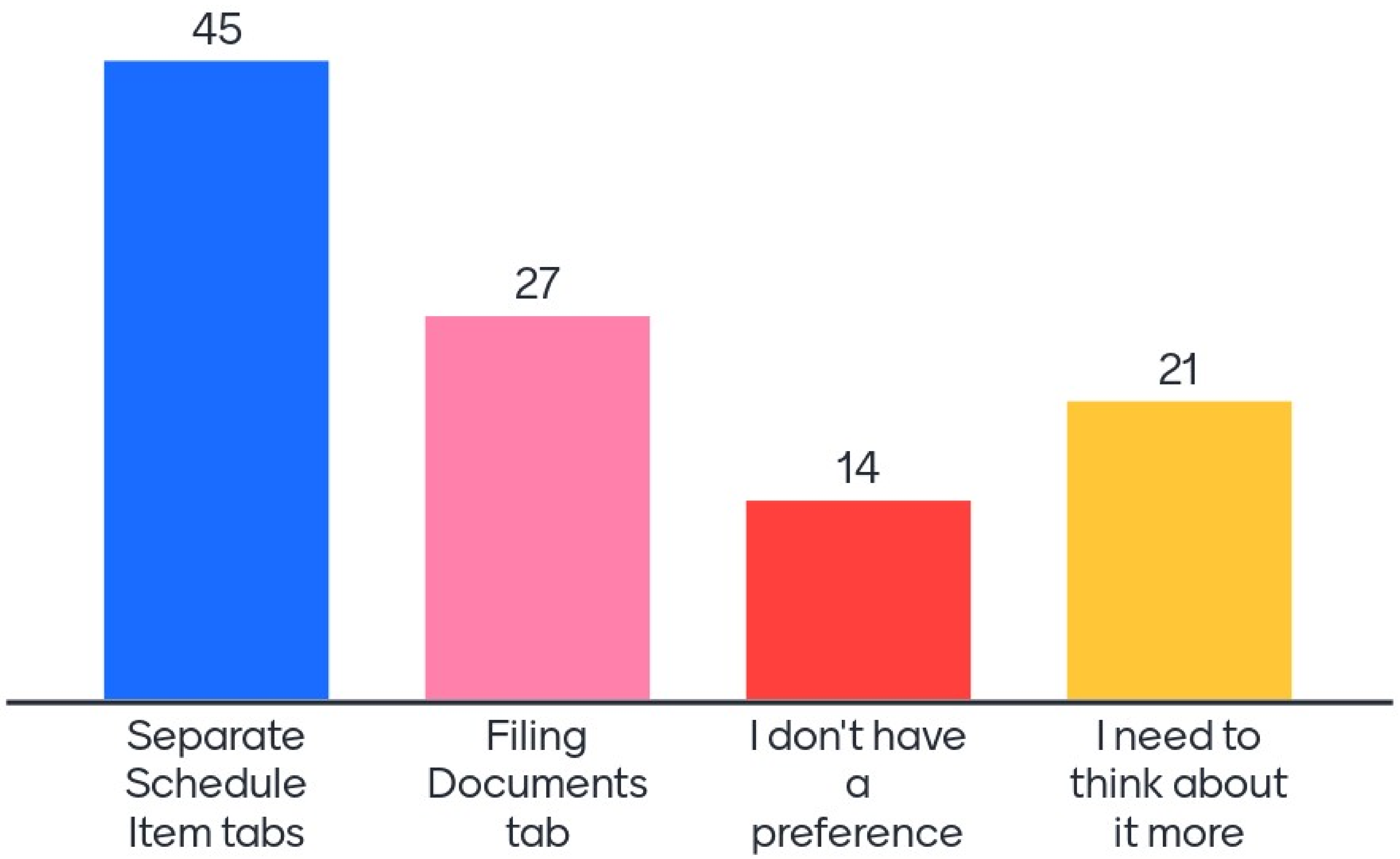
Do you prefer separate schedule item tabs or one filing documents tab?



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Pre-Submission Errors and Warnings

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Mentimeter

What should be a pre-submission error?

164 responses

Filing type.

Included rates in a split out form filing, or vice versa.

Licensing is incorrect.

No compliance certificate

Wrong company

Statutory issues

Filing Fees

Filing fees

No filing fee entered, if required.

82

What should be a pre-submission error?

164 responses

nothing	No Filing Fee. Required Items not included.	TOI
No forms attached	Readability Score	Filing Fees
Incorrect Form Type	Filing fee missing	No fees

82

What should be a pre-submission error?

164 responses

companies/contact tab	Filing Fee	Compliance documents are filled out.
no form attached	Required checklist is missing.	Fees
Missing Questionnaires	No form attached to form filing	Fee's

82

Mentimeter

What should be a pre-submission error?
164 responses

Any required document not included	Incorrect TOI	Readability
Supporting Doc tab items are not complete.	Missing required documents	Incorrect fees
Required fields not completeFiling fees	Any filing fee greater than $999	Filing fees, state required documents, blank forms and/or rate/rule schedules.

82

Mentimeter

What should be a pre-submission error?

164 responses

Filing fees, state required documents, blank forms and/or rate/rule schedules.

Incorrect TOI

can the error be done by state filing requirements?

Failure to include Transmittal Checklist

replacement filing without replacement numbers

Required items not included with the filing

If the Company does not have appropriate licensure.

Missing Group Name and Group Number

required certifications

82

What should be a pre-submission error?

164 responses

Filing fee error

Statutory Issues, No Filing Fee entered, TOI, Compliance if filing is needed based on TOI

N/A

Incorrect Form Filing Type

Filing descriptions/ summary

Product Standards, certificate of compliance, no forms attached,

Fields that are left blank ex: effective date, no forms, corresponding tracking numbers, fees, ect.

Filing Type

Missing components

82

Mentimeter

What should be a pre-submission error?

164 responses

TOI does not match documents being submitted

filing fee, missing fields, no forms attached on a form filing type, rate filing type without actuarial memo

Missing supporting documentation

TOI, SubTOI, title

TOI accuracy

Did not submit required supporting documentation

Nothing

Missing filing name, etc.

Licensing not correct.Filing Fees not correct.

82

Mentimeter

What should be a pre-submission error?

164 responses

No attachments for the Filing Type

Missing filing fees. Missing domicile information.

if a form filing, missing forms, if a rate filing, missing rates, etc

N/A

fees; missing supporting documentation/state-required documents

TOI

Filing type

Co not authorized in state. Wrong/Missing Fee

Not including previous filing number on SERFF Schedules

82

Mentimeter

What should be a pre-submission error?

164 responses

filing fee

State specific questions blank

Incorrect TOI and Sub-TOI, Incorrect Filing Type, missing filing fee information, missing/incomplete Cert. of Compliance

Areas that require entry by the state, example on the rate/rule tab some states require the top section to be completed but there is nothing that stops you from submitting.

company NAIC CoCode and GrCode

Required documentation not attached.

Incomplete fields

Incorrect TOI and Sub-TOI, Incorrect Filing Type, missing filing fee information, missing/incomplete Cert. of Compliance

Potential missing fields (like state specific questions, or information on the General Info tab)

82

Mentimeter

What should be a pre-submission error?

164 responses

If a state requires certain items or it will be rejected, like UT requires a certification language that a filer must certify. Certain states have transmittals that are mandatory etc.

required supporting documentation not bypassed rather than satisfied.

Not sure

incorrect filing fees

Rate Data blank for rate filings.

Filing fees incorrect or not submitted., required forms missing, no forms on the form schedule.

Unlicensed company included for TOI

State Specific Questions, Filing Fees, Readability Score, Supporting Docs

Licensing error - where a company included in the filing is not authorized in a Line of Business in a specific state.Missing required documents or data fields.

82

Mentimeter

What should be a pre-submission error?

164 responses

Missing form schedule items

company name is incorrect

Multiple form per line

use of an incorrect version of a state required certification or checklist

missing componets

Missing Eff Dates

incomplete fields like effective dates

Tracking numbers

Missing fields - incorrect entries (date format etc.). Non-adopts may not have forms attached. I wouldn't want an error - just a warning.

82

What should be a pre-submission error?

164 responses

- missing requirements
- Wrong TOI
- missing form schedule documents
- company tracking # missing
- If a TOI in the state is exempt and does not require a submission.
- Corresponding Filing or Rate Filing
- Anything that violates state filing rules. For example, in MD we reject a TOI - Other for anything other than a long-term care rider.
- effective date not in compliance with requirements
- Form number

82

Mentimeter

What should be a pre-submission error?

164 responses

indication/selection for rate filings

Prior filing number missing for Replacement documents.

Incorrect filing fees.

TOI, missing fields, missing supporting documentation, mismatched fields

redline or strikeout document on same line as form for approval on Form Schedule

if it does not comply with the filing rules

special state requirement

missing group name and group code

filing fees being bypassed if they are definitely forms attached

82

Mentimeter

What should be a pre-submission error?
164 responses

When EFT calculations are incorrect	If required and it's not included...Rate Data	Incorrect TOI, Previously used form numbers
Obvious typos	Effective date	Missing forms , support documents
Wrong form type	Out of date certificate of compliance.	Filing Name (Full licensed name) and NAIC number incorrect

82

What should be a pre-submission error?

164 responses

documents or required fields missing

Grammar

request for approval of form prior to the state deemer date

if a fee is required for the given state, but we didn't include it

Filing fees, required fields left blank or invalid data entry. (Required fields as determined by the state).

Missing Filing Fees and incomplete submission.

form names don't match

Form numbers don't match

Typos

82

Mentimeter

What should be a pre-submission error?

164 responses

Filing Fees	page numbers don't match PDF	Toi/sub toi could be an issue
duplicate form numbers	form # doesn't match	incorrect effective dates based on state requirements
Missing filing forms	Certifications may be required	Missing supporting docs, low Flesch score, TOI abd Sub TOI (assuming that in the new SERFF these can be changed post-subnissuon).

82

Mentimeter

What should be a pre-submission error?

164 responses

tracking # for previous rate filing	Prior tracking numbers not included	Prior tracking numbers not included
incorrect fees	Fees may be incorrect	Missing state required documents
typos	Missing Documents	Incorrect form may be attached

82

Mentimeter

What should be a pre-submission error?

164 responses

Previously approved form from other states/prior to serff

Missing required state documents

Missing Component Within Supporting Documents

Fields entered with words when the field should be numerical.

Duplicate forms attached warning

Wrong versions submitted

duplicate form number that was submitted in previous filing for that company and TOI

Missing documents or response to Requirements. Invalid or missing prior filing references.

If the filing fee entered doesn't seem right. Maybe you had a typo.

82

Mentimeter

What should be a pre-submission error?

164 responses

Most items should be warnings otherwise we may not be able to submit a filing that we believe to be accurate.

Side by side comparison

82

Mentimeter

What should be a pre-submission warning?

93 responses

When edition dates or form numbers do not match	TOI	Filing fee over $999
TOI / Sub TOI	effective date too short to review	Potential duplicate filing
Incomplete Questionnaires	Forms missing on Form Schedule	Document misplaced/loaded into the wrong component header.

53

Mentimeter

What should be a pre-submission warning?

93 responses

TOI	if you use an older eff date, example 2022 vs 2023	Edition dates and form numbers are missing
Edition Dates don't match	TOI/Sub-TOI does not match the items filed	Incomplete Supporting Documentation
Company Info	wrong TOI	Missing documents

53

Mentimeter

What should be a pre-submission warning?

93 responses

associated forms and/or previous SERFF number	Prior tracking number missing	Missing forms or data
Incorrect TOIs	supporting documentation/state-required documentation	state fees completed if not required
Forgot to attach something	edition date doesn't match PDF	Filing fees missing, no forms attached to form filing, no rates or rules attached to rate/rule filing, supporting documentation items not addressed

53

What should be a pre-submission warning?
93 responses

Wrong TOI/sub-TOI

A list of all blank fields. Then the filer can verify whether they apply or not.

Missing documents. Effective dates wrong year.

Required filing description language check.

Missing Supporting Docs

Could an exemption warning be added? If a line or product is exempt?

For documents that are labeled as Replacement, there should be a warning if the Previous Filing Number field is blank.

page numbers don't match PDF

Prior tracking number

53

What should be a pre-submission warning?
93 responses

Submission requirements not completed	TOI	Not Applicable
Transmittal Checklist not properly completed.	Form numbers not unique within the company	Missing data or forms
Filing fee missing	Company information	Filling out the General Description with enough information.

53

Mentimeter

What should be a pre-submission warning?

93 responses

TOI/sub-TOI

duplicate form numbers

Documents not included in components

filing fees

Missing attachments

form number doesn't match pdf

Filing fees not complete or incorrect, incomplete supporting documentation, incomplete form/rate/rule schedules.

Forms not attached or missing.

missing PDF when item filled out in form schedule or RT/RU schedule

53

What should be a pre-submission warning?

93 responses

References to prior filings not found in SERFF	Effective Date	Corresponding Filing Tracking Number field is blank
Filing fee info	Missing company tracking#	Incomplete company contact information.
missing documents as in if it's a form filing and no form is attached	Form not attached	missing data or forms required

53

What should be a pre-submission warning?

93 responses

N/A in confidentiality question

Requirement not fulfilled

No comment at this time

All Forms/Rate pages are actually attached/submitted

TOI/Sub TOI, missing required documents, completion of filing description

Filing Fee requirement for states that do not have fees

Form # on form doesn't match the one shown in the schedule.

Missing supporting docs and/or forms

previous SERFF filing number

53

Mentimeter

What should be a pre-submission warning?

93 responses

Misspellings for form names

It would be nice if a company set up their own warnings too.

N/A instead of yes/no answers

Documents put under wrong tab

Fields left blank

effective date missing general information

Incorrect Filing Type, TOI/Sub-TOI, Form Types; Form numbers in Form Schedule not match form numbers stated on forms; Action tab in Form Schedule incorrect if form revising previously approved form

If a requirement wasn't completed

If adopting/delay adopting/non-adopting, "Did you remember to include the SERFF Tracking Number for the forms/rates/rules, you wish to blah, blah, blah adopt?"

Mentimeter

What should be a pre-submission warning?

93 responses

Missing supporting docs, Flesch score too low. TOI and Sub-tpi (assuming these can be changed post- submission in the new world).

Form name, form number, missing form attachment, required state submission requirements missing attachments, filing fees

Incorrect Requested Eff Date such as pre-dates submission dateContents Don't Match Filing Type (includes or doesn't include expected documentation on applicable schedules)

Built in Supporting Docs not attached

Missing description

Bypass Reason blank

Form type if possible

Attached forms not in PDF format, missing attachments, User Added components instead of pre-assigned components.

Form- and/or rate Use date requests before allowable

What should be a pre-submission warning?

93 responses

duplicate form number previously used by company for that TOI

missing rate data information

If the filer makes a reference to a prior filing and that filing is valid in SERFF, warn against inconsistent TOI/Sub-TOI.

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Correspondence Changes

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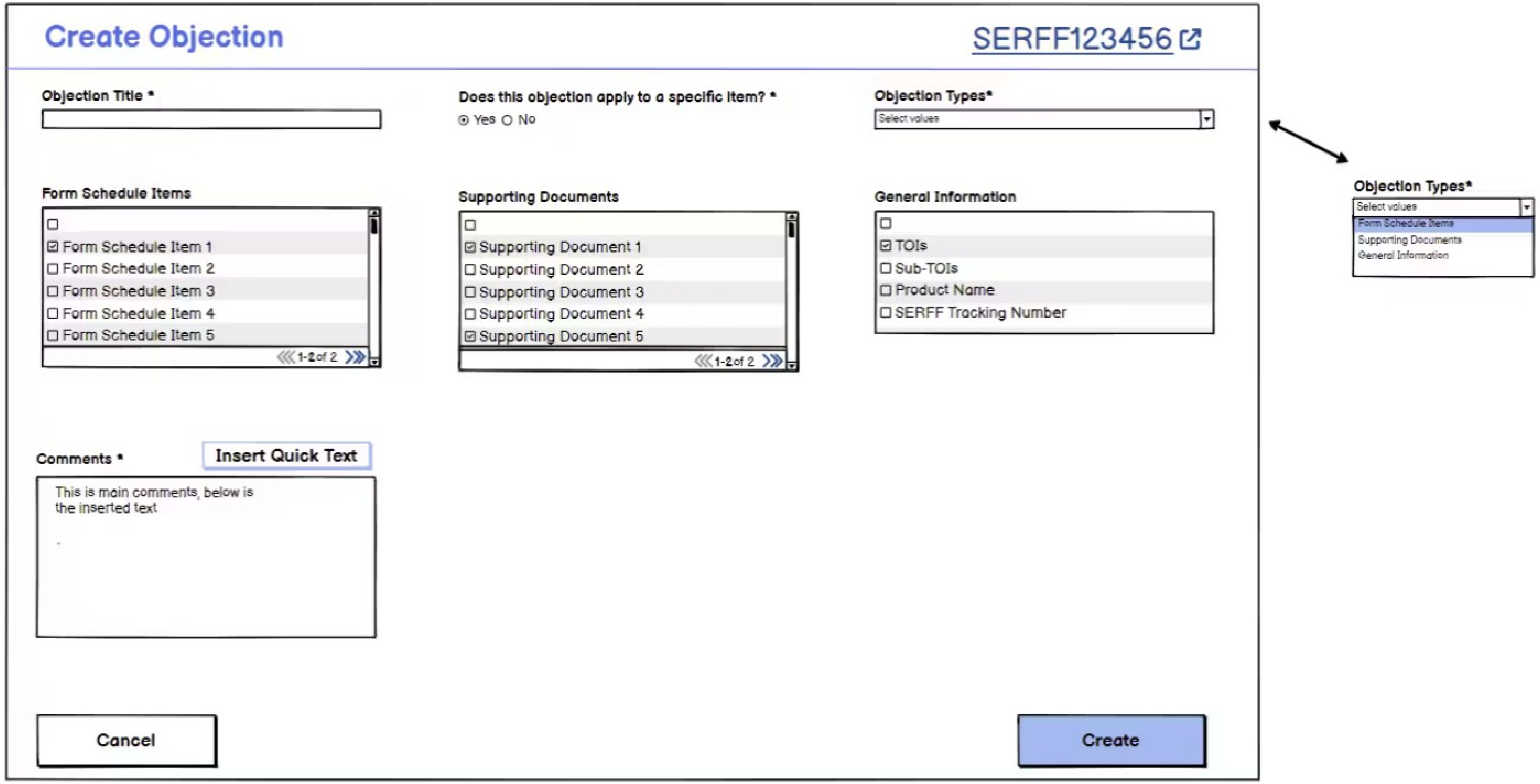

Objection Mock-Up

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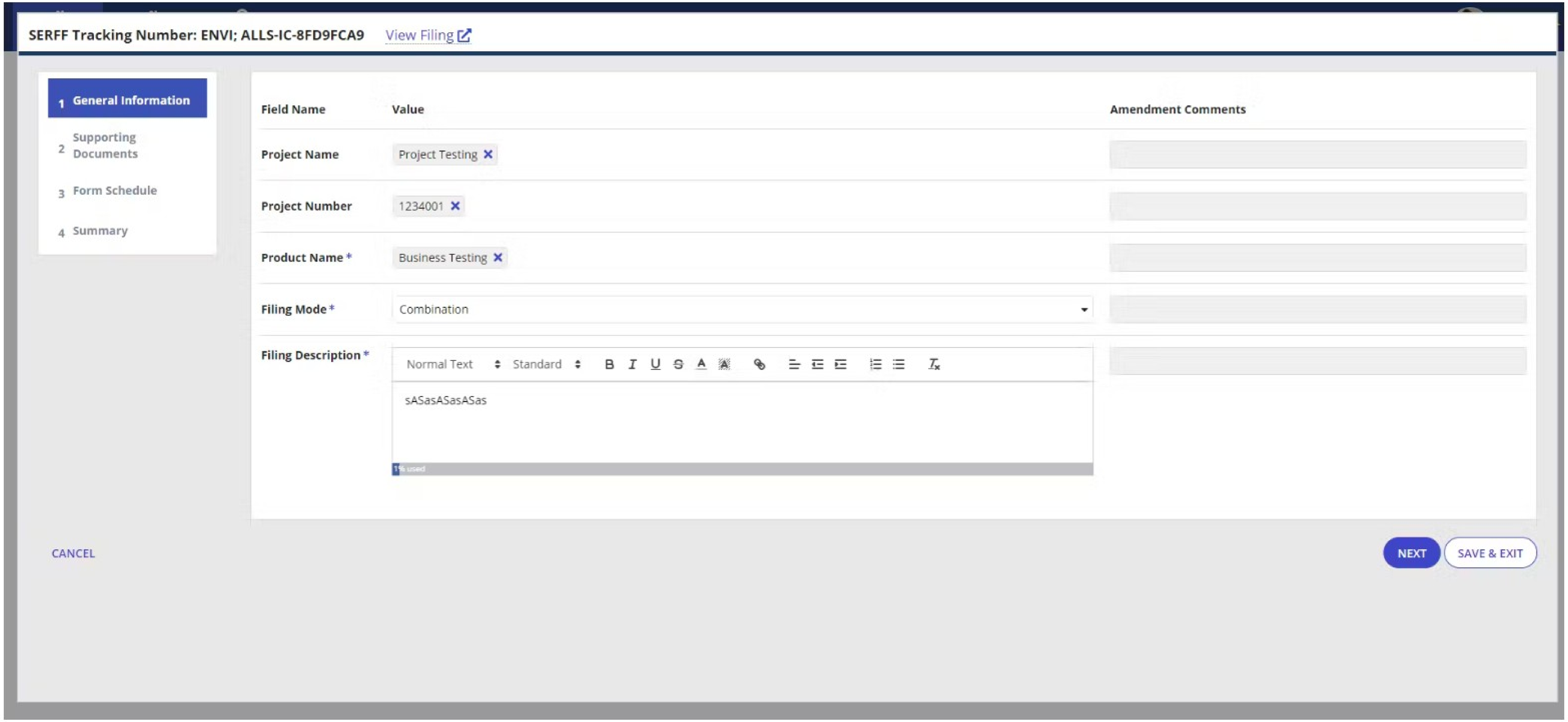
SERFF Tracking Number: ENVI; ALLS-IC-8FD9FCA9
View Filing
1 General Information
2 Supporting Documents
3 Form Schedule
4 Summary
Field Name
Value
Amendment Comments
Project Name
Project Testing
Project Number
1234001
Product Name *
Business Testing
Filing Mode *
Combination
Filing Description *
Normal Text
Standard
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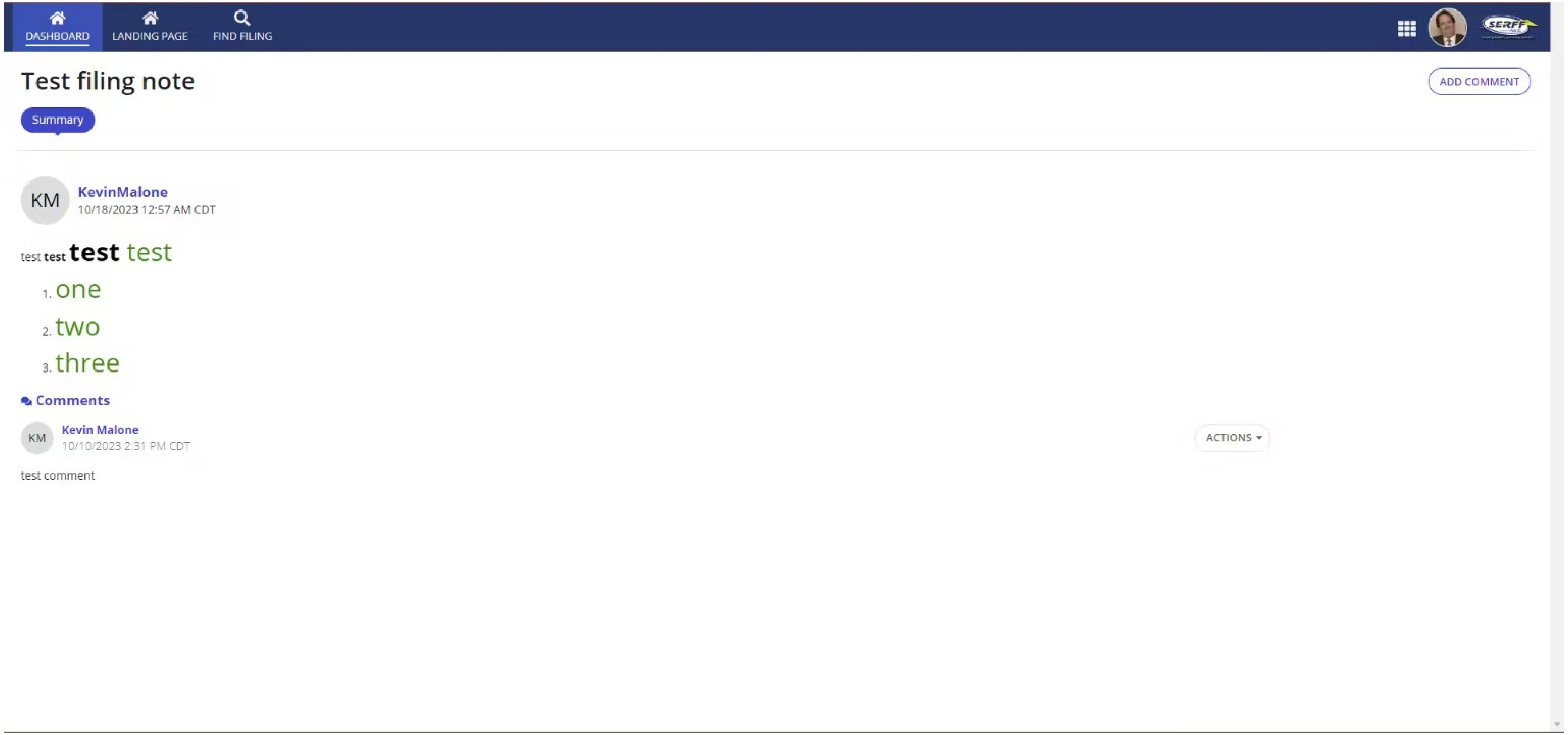
CANCEL
NEXT
SAVE & EXIT

Amendment



Internal Filing Note

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

Let the subject line be complete without requiring body language

Will all states be "open" for these changes/updates? Some states will not allow PSU's at this time.

Would printouts look similar to the screenshots that have been shown?

Under Amendment, will the option to change the effective date be located here?

Filer notes on the Industry side need to remain internal - NOT public record.

Will all states allow this new type of communication after submission? Some states currently don't allow amendments after submission

Is the notes area with comments meant to function like a chat?

Like the format of choosing applicability of objections in different way than now

Will the new objection process have default values? Can those defaults be set be the user?

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

I like the changes.

Not sure title is needed

I like the new changes for the Objection Letter. I am hoping for more items to be added from the General Info tab. We get errors in the filing description field and reference number field.

Not sure

When writing in the comment box for objection, it would be nice to be able to use a highlighter, bold or italic text, underline etc. to draw attention to the specifics of the objection

if a flesch score is required by the state but it is missing from the filing--an error message should appear

Looking forward to have the PSU as part of the amendment/objection response versus a separate step/action.

Should also be able to "point" to rate/rule page when writing objs; seemed to be missing from example.

Auto comments sent to filer when a requested change has been made

10

38

What feedback or questions do you have about the Correspondence changes?

64 responses

Have the option to get a message back once you accidentally delete it

Give a warning message to regulators who do not fill out all the fields for an objection. Some reviewers only put the objection in the intro and not as actual objections.

When creating objections, minimize the number of fields we have to click or fill out. I just sent an objection letter with 40+ objections and I would hate to do more data entry than necessary.

I would prefer to have the ability to make additions/edits to the filing note as needed. Having only two comment sections may not always be enough

I like the changes so far.

Like the specificity of the objection process.

Will you be able to add or remove companies if filing more than one through an amendment?

Like the specificity of the objection process.

How will the changes impact the pdf pipeline?

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

Also not sure if Title is needed

will you be able to use objections in multiple types of correspondence, such as objection letter and a disposition letter?

Will there be an external comments process (similar to "Note to Filer" today)?

Make it more clear what it being changed when an amendment is sent ie. bold, highlighted, etc

If the wrong TOI is going to be an objectional option, hopefully this means the TOI and/or Sub-TOI can be changed post submission.

No comments.

Changes look good

Will we still be able to write a "free form" objection letter?

Will there by the ability to attach documents in the Filers Notes? Example would be an email correspondence.

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

Will LOB changes be permitted? (Sorry if repetitive)

Being able to screen shot, or highlight/circle where specifically in the document we are objecting for the filer to easily find it.

Having a feature that allows the Filer to ask the Reviewer a question via Note to Reviewer without it becoming a part of the public document might be helpful

Can you revise the TOI / Sub-TOI through the amendment?

For filings with LOTS of back and forth, multiple rounds of objections, any way to keep notes organized by date or topic (fee, add company or state, etc. vs content) would be helpful

The objections/responses may be cumbersome though for people who are used to just writing a letter.

I like the Amendment feature. It looks like it will help the industry respond with ease.

will the errors/warnings be able to be state-specific?

Post submission updates for all jurisdictions is preferred.Will we be able to revise TOI/Sub-TOIs

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

Will you have to wait for one amendment to be approved before submitting an additional amendment?

Sincere there is a limitation on the number of comments in internal notes, can more be created?

will we still have the option to create an objection straight from the document to auto populate some of the fields on the objection letter screen?

Having a chat feature to go back and forth with the filer so that there aren't multiple lines of communication on the correspondence tab of the filing.

If have to add Objection title, would be nice if had drop-downs that could be chosen from (perhaps could build table to be state specific)

I agree with comment about being able to highlight, underline, bold etc

Title is very helpful and hope it will also be available for Binders. Like ability to keep back and forth under one note. Will states have ability to customize the Objection topics for selection?

it appeared in the objection section that we are now able to revise the TOI/Sub-TOI in a post-sub update?

individual objection correspondence would be helpful

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

The public information should just be the approved forms and rates and Department approval.

Concern about being able to toggle public access for comments on filer notes

It would be nice if we can get emailed the correspondence and if we can choose the types of correspondence we want emailed to us.

make request confidentiality part of the process

ability to handle trade secret request "errors" more easily from amendment and/or objection error would be great.

Looks great, these are exciting changes! Is there an update on the timeline for implementation?

Create an option to completely circumvent objection section and just attach a document containing the objection letter.

is there consideration for the states to add contact info in the filings?

is process to request exempt from public disclosure similar, or is it added to correspondence section

10

38

Mentimeter

What feedback or questions do you have about the Correspondence changes?

64 responses

I would love that when SERFF messages announce a new checklist requirement, that there is a way to make sure the state checklist is actually in SERFF

10

38