SERFF Product Steering Committee Meeting

Wednesday, December 13

NAIC NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Table of Contents

Meeting Recording Link:
https://naic.webex.com/naic/ldr.php?RCID=85316c964f53ff9177ebdad06908ccb2

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 3.1 - Interstate Compact

- In Progress Work:
  - Filing Fee Configurations
  - Filing Fee Calculation/Override
  - Internal Notes
  - User Management
- Upcoming Work:
  - Hardening Items
  - Objections/Objection Letters
  - Amendments

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

Tableau Reporting

'Reporting' Options

- Expanded options available for "Data Sharing"
  - Tableau
    - Once daily refreshes of data
    - Curated narrow data set
    - *Visualization of data*
  - Snowflake Shared State Account
    - Hourly refreshes of data
    - Curated broader data set
    - *State-level ad hoc analysis of data*
  - Appian User Reporting and Features
    - Real-time data
    - Application data set
    - *Operational, action-based data*

Tableau Reporting

- **First set:** available now
  - Executive Level Overviews – 10,000-foot level view of the information
    - Totals
    - Averages
    - Current Year-to-Date/Previous Year-to-Date
- **Next set:** in-progress
  - Manager Level Overviews –1,000-foot level view of the information
    - Choose Date Range
    - Designed for monthly reporting and operational impact analysis

Tableau Walk-thru

- Next several PSC meetings
- Purpose:
  - Understand the User Interface
  - Understand the purpose of the dashboard
  - Give feedback and 'wish list' items

SERFF Modernization Contact Info

- **To request access to the Tableau Dashboards**
  - Email: serffuat@naic.org
  - Note: The login is DIFFERENT than your SERFF login.
    - Bonus: The Tableau login will be the one you will use for the new Appian application.
- **For any questions, feedback, wishlist items, etc. related to the SERFF Modernization Project**
  - Email: serffmodernizationquestions@naic.org
- **SERFF Modernization Project Website**
  - https://serff.com/serff_modernization.htm

SERFF Modernization Engagement Activity

- Used online tool – Menti
- About 100 PSC attendees participated
- Main topics covered: Objection/Response Workflow
- Questions from the activity are on pages 13-4
- Results from the Menti 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.

Engagement Activity Questions pt. 1

Description:

- Currently, to view objections after an objection letter is submitted, users must either go to the individual items or open the objection letter on the correspondence tab.
- Similarly, to view changes to a filing after submission (PSU, Amendment, Response), users must either go to the individual items or open the correspondence on the correspondence tab.
- We are considering a change to these workflows. Users will still be able to select and submit multiple items (objections for regulators, updates/revisions for filers), but once they are submitted, they will display as a list of those individual items.
  - That display would include the who and when of the submission.
- Our assumption is that our users care more about the individual items (and related submission data), rather than the particular group of items submitted in one letter. Essentially treating the 'letter' as a vehicle to submit one to many items during the review process.

- **Questions:**
- Do you agree with the proposed changes, or do you need to see objections within their objection letters?
- Do you agree with the proposed changes, or do you need to see updates/revisions within their amendment letters?
- For regulators, does the introduction and conclusion text have specific text related to the particular objection letter, or is it standard/instructional text.
- How often do the following scenarios occur? (0-5, 0=never, 5=always)
  - A post submission change causes additional fees
  - The same issue is found on multiple items (ex. If page #s are required, a regulator finds multiple attachments with missing page #s.)
  - An issue involves multiple items but only 1 needs to be changed. (Ex. Data that should match in 2 attachments is different.)
  - An issue is found in one item, but a change to that item could cause a change to another item.

Engagement Activity Questions pt.2

- For regulators that use quick text, how often are individual issues addressed with multiple quick texts?
- For regulators that use quick text, how often do you edit quick text during/after inserting it into an objection?
- We are considering changing the Objection/Objection Letter terminology because we have found that some regulators find that language too harsh (not every review comment is an objection, sometimes it's just a question or request for clarification). This has led some regulators to conduct part of their review in the note to filer/review correspondence. To encourage the use of the objection/amendment/response workflow for all review related activities, we are looking at changing the terminology to be more inclusive of all review comment scenarios. Do you have any suggestions for new Objection/Objection Letter terminology?
- Do you have any other feedback or pain points about the objection/response workflow?
- Do you have any feedback or wishlist items related to Tableau Dashboards?

2024 Call Dates – Wednesdays 12:30-2pm CT

- February 14
- March 13
- April 10
- May 8
- June 26
- July 24
- August 28
- September 25
- October 23
- November 13
- December 11

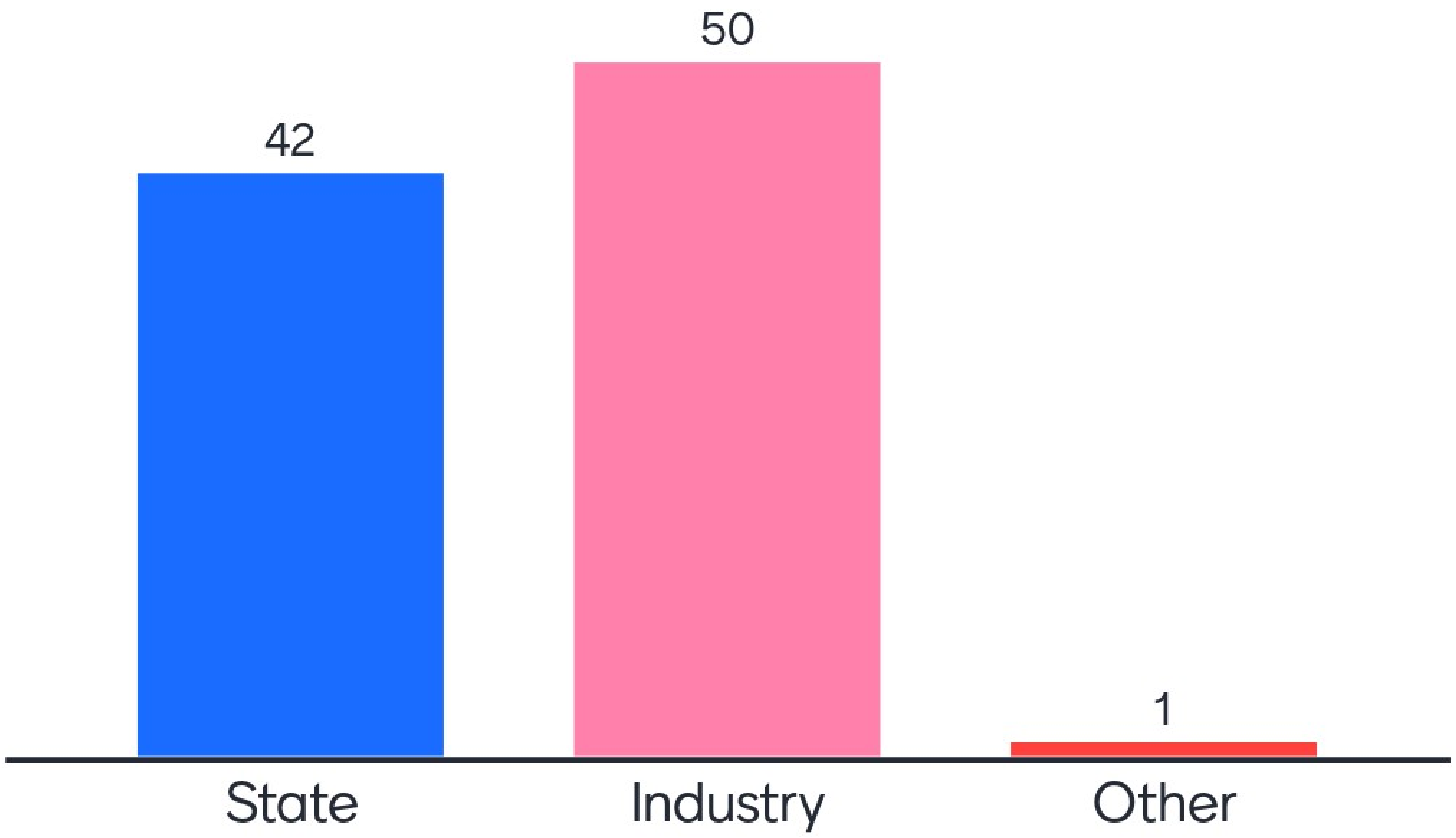
Mentimeter

December SERFF PSC

26

Mentimeter

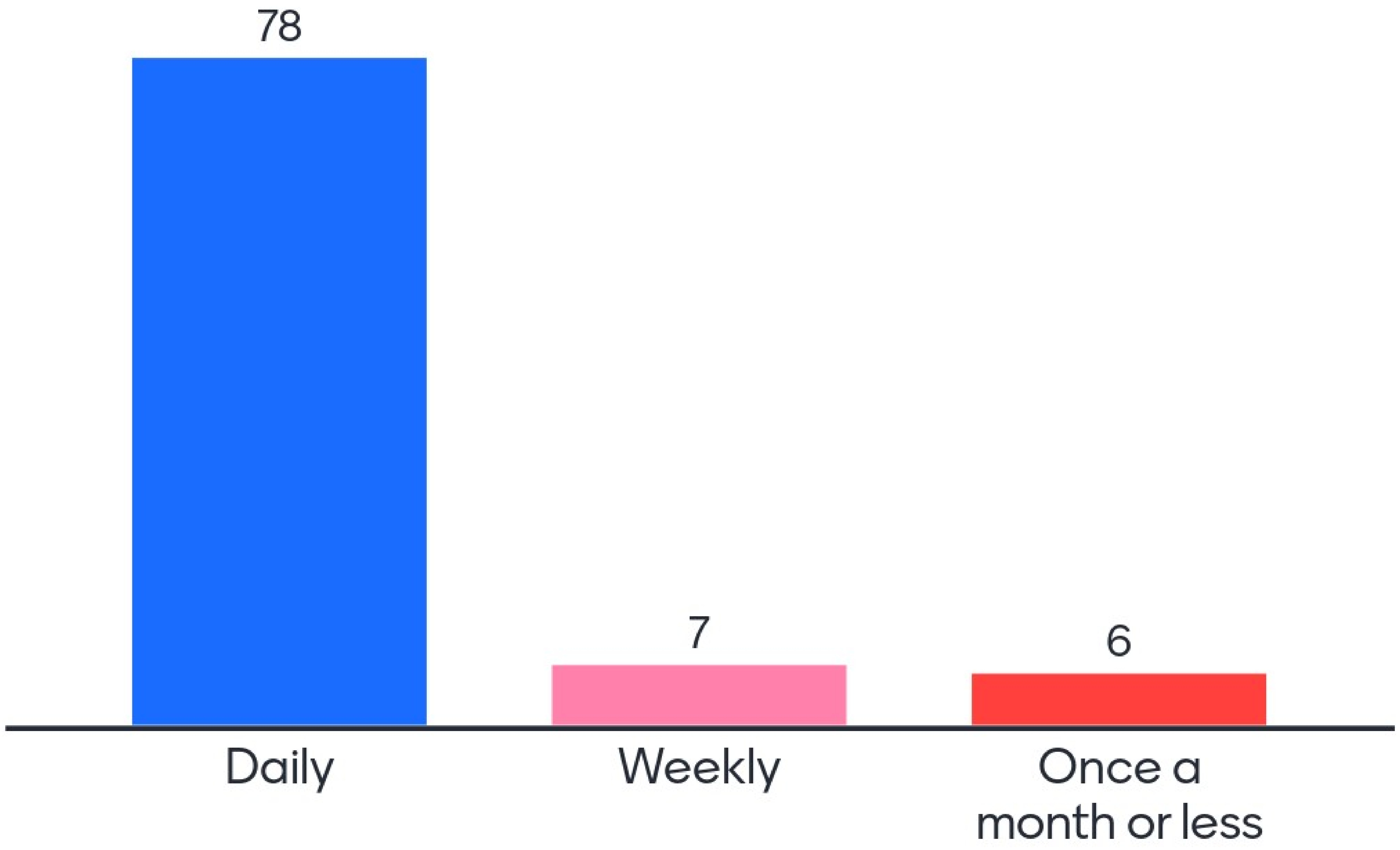
What type of user are you?



93

Mentimeter

How often do you use SERFF?



91

Tableau Dashboard feedback/wishlist items

count individual objections not objection letters

Not at this time

Nothing that I can think of at the moment.

Deemer date data for form filings

Nothing additional

Ability to call the dashboards from an external application

Information on individual filers

Please provide snips of the dashboard in the recap pdf, so I can share with my manager

4

44

Tableau Dashboard feedback/wishlist items

Opportunity to select certain filers to get a snapshot of a team

Glossary of calculations linked

Is Tableau replacing SERFF or will this be a system to track metrics only? This is the first call for me.

Nothing at this time - still familiarizing myself

Maybe once using it might come up with other 'wishlist items'

looking forward to using the data

Not sure where the logout function is when I am finish using tableau.

Filter by reviewer

4

44

Tableau Dashboard feedback/wishlist items

access to the data source so we can build our own dashboards	Not at this time	Not at this time - need to practice more	Adding the tooltips explaining the exact information contained in each metric would be extremely helpful. I'm not always going to have the sheet of paper available to me.
Deemer Due Dates	None	Is Tableau for solely for generating reports?	FAQ for help knowing which report to access for specific data

4

44

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Tableau Dashboard feedback/wishlist items

off to a great start with dashboards design. thank you. this will be great!

The descriptive information provided today on how Tableau displays work and what data is used is very helpful.

nothing at this time

definitely a short cut to a helpdesk with the explanations of each of the boards

You mentioned you were working on the Filing Correspondence (internal notes) and I'd like to request that when cloning a filing, we have an option to mass delete all notes from the previous filing.

Hover overs to see calculations. Ease of creating various reports. Exporting to PDF or Excel.

I would really like to see the number of pages as one of the data items to track and analyze. This is one way we can measure whether filings have become more complex over time.

Not at this time.

4

44

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Tableau Dashboard feedback/wishlist items

I have been out of work for a couple months and missed quite a few meetings. How do we get a login for Tableau?

None at this time

ability to see metrics on individual objections in the letters

I don't have any at this time.

How many filings are open for each reviewer (primary)Turnaround time for all reviewers monthlyOverall status filingHOw many filings closed on a certain date by all reviewers.

Not at this time

Cheat sheet or "hover" that details how calculate #.How we doing this year should include Avg # Days in Assigned Status

Our managers would be most helped by being able to view more in depth status codes for the filings based on our internal status system and individual analyst names on their dashboards

4

44

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Tableau Dashboard feedback/wishlist items

Search features that can sort by company and company type. Also to ensure all fields are filled in when a filing is submitted.

You may want to consider using a link from the page to open the glossary of calculated fields rather than using your tooltip space up for that. It can be good to provide additional info in those tips.

Would like to see you record data on length of objections (number of characters per objection/objection letter).

A breakdown of filing types (form, rate, binder), TOI, filing statuses, and assigned users over time.

Objections packaged in the letter form

Who do we send an email to for access to Tableau?

We track responses to objections as they are packaged

We would want to see the objection and the response at one time.

4

44

Tableau Dashboard feedback/wishlist items

Would prefer to see each amendment as a stand-alone letter, the way it currently is

Customized boilerplate

4

44

Objection & Amendment Letters

1

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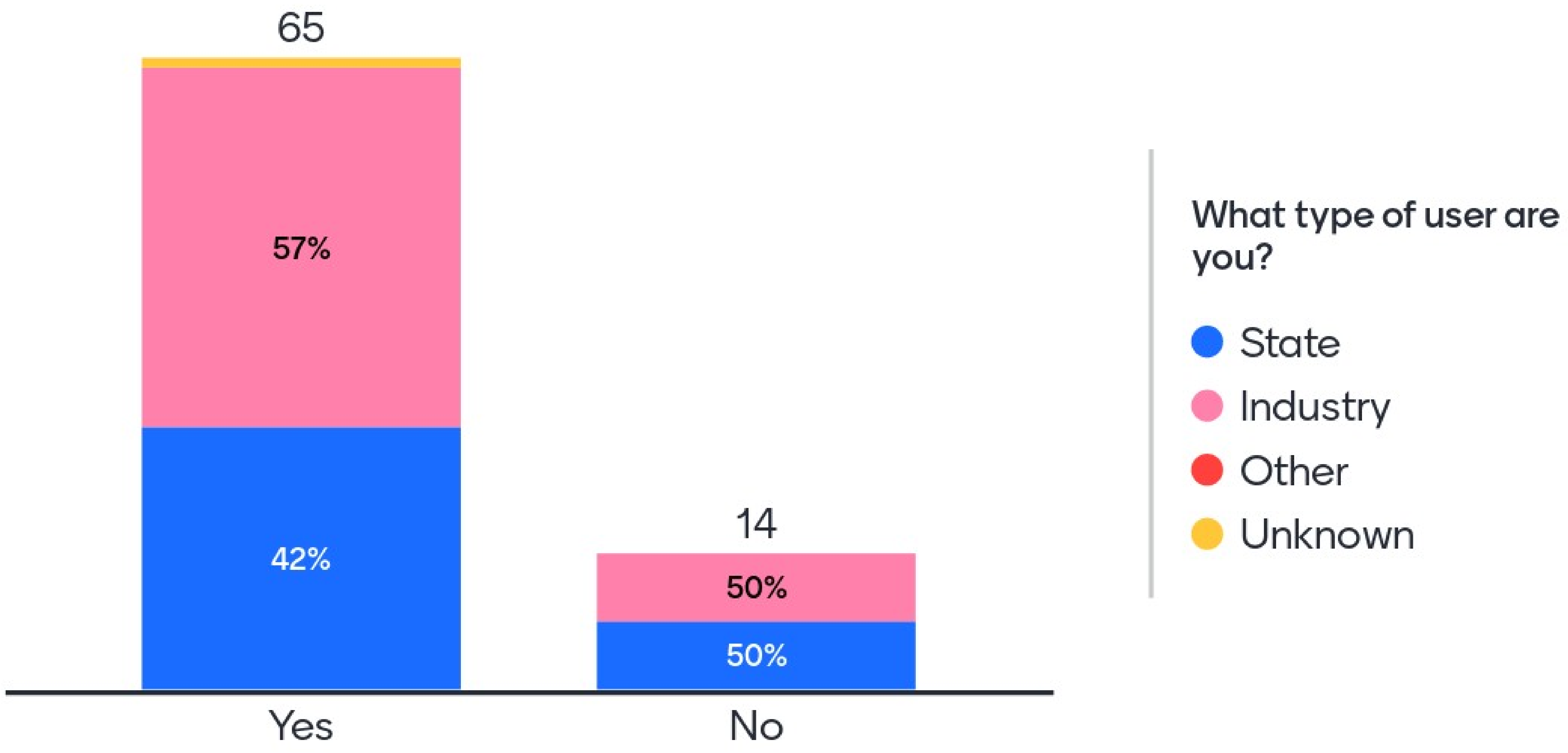
Do you need to see objections within their objection letters?



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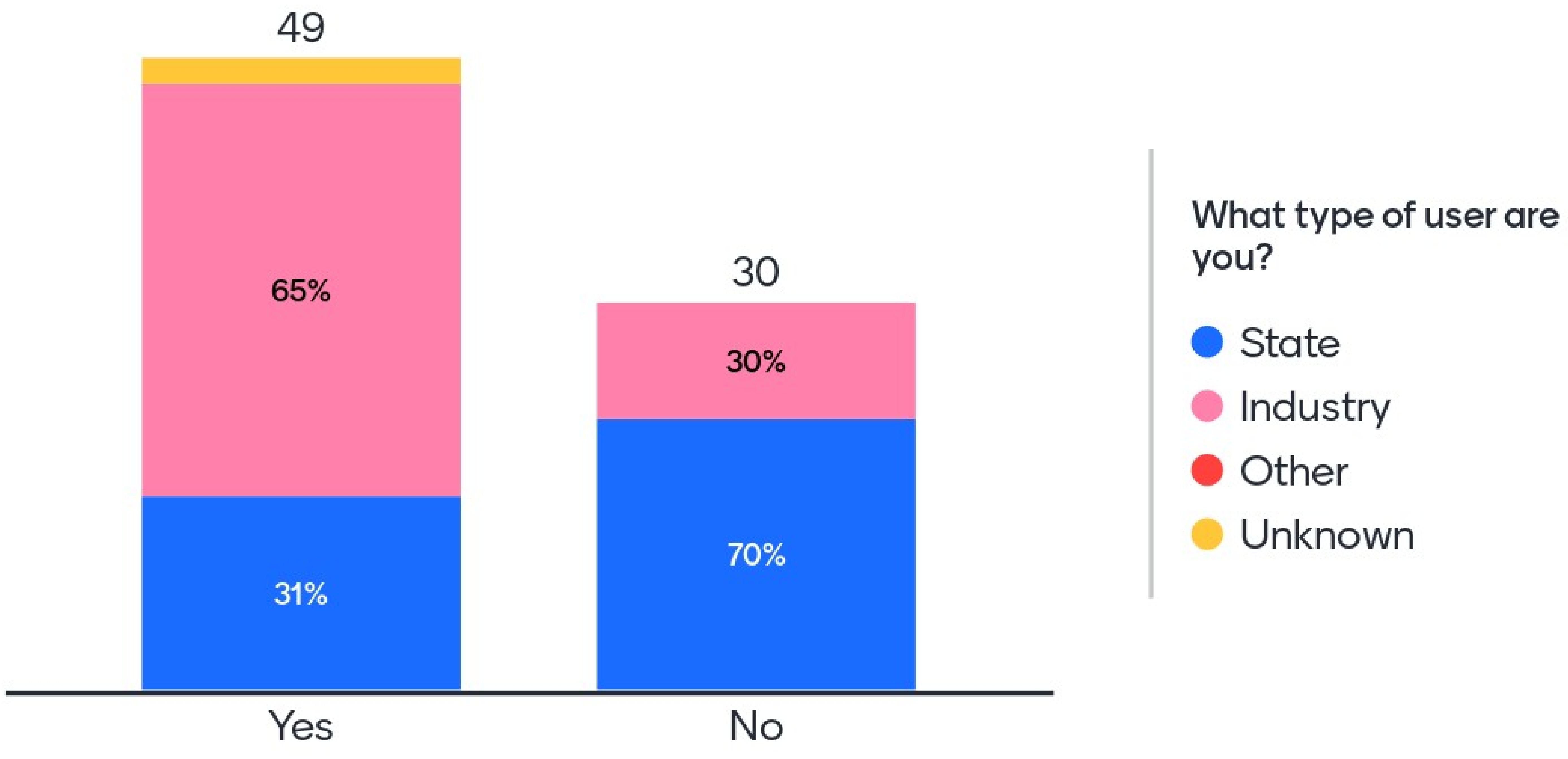
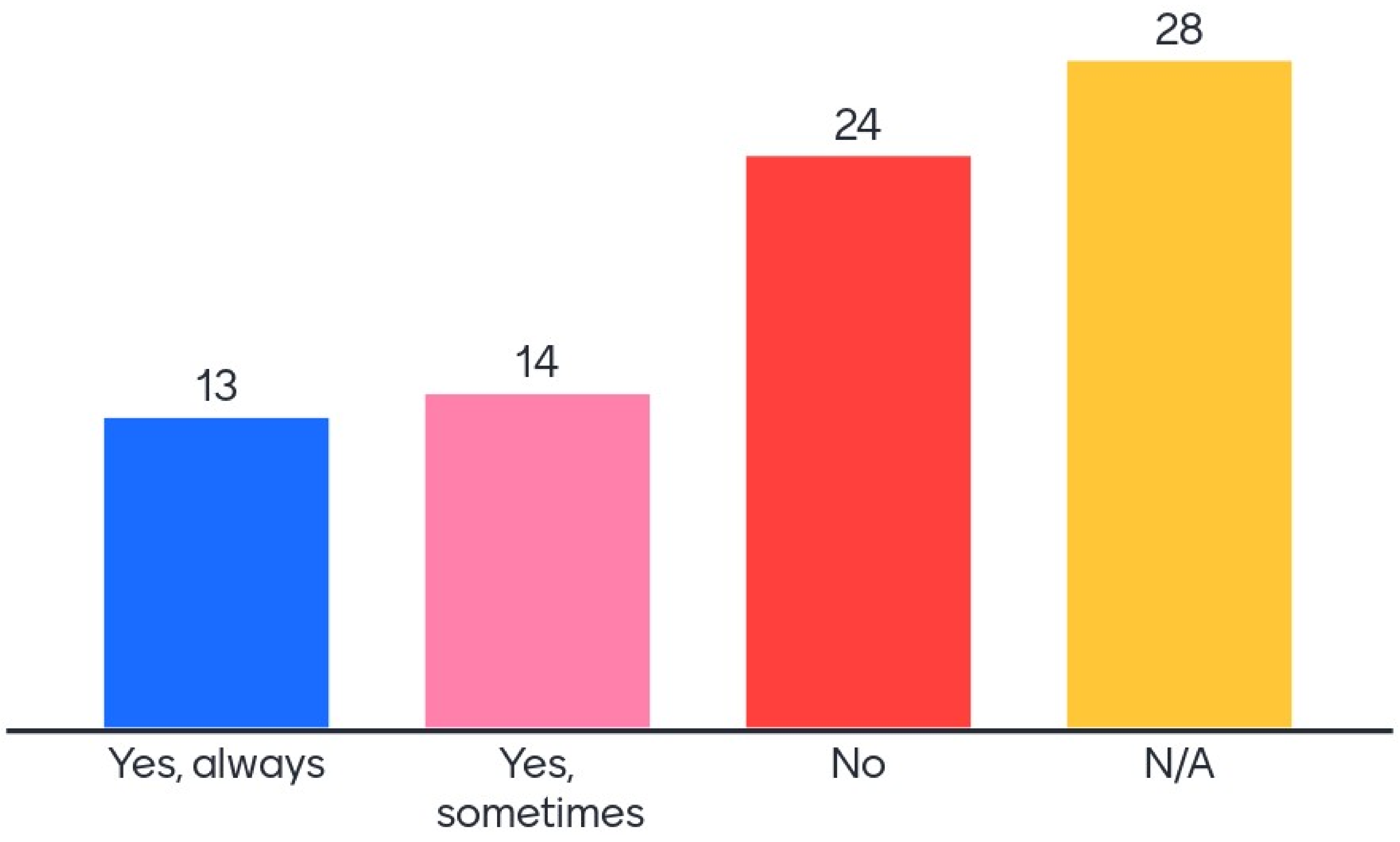
79

Do you need to see amendments within their amendment letters?



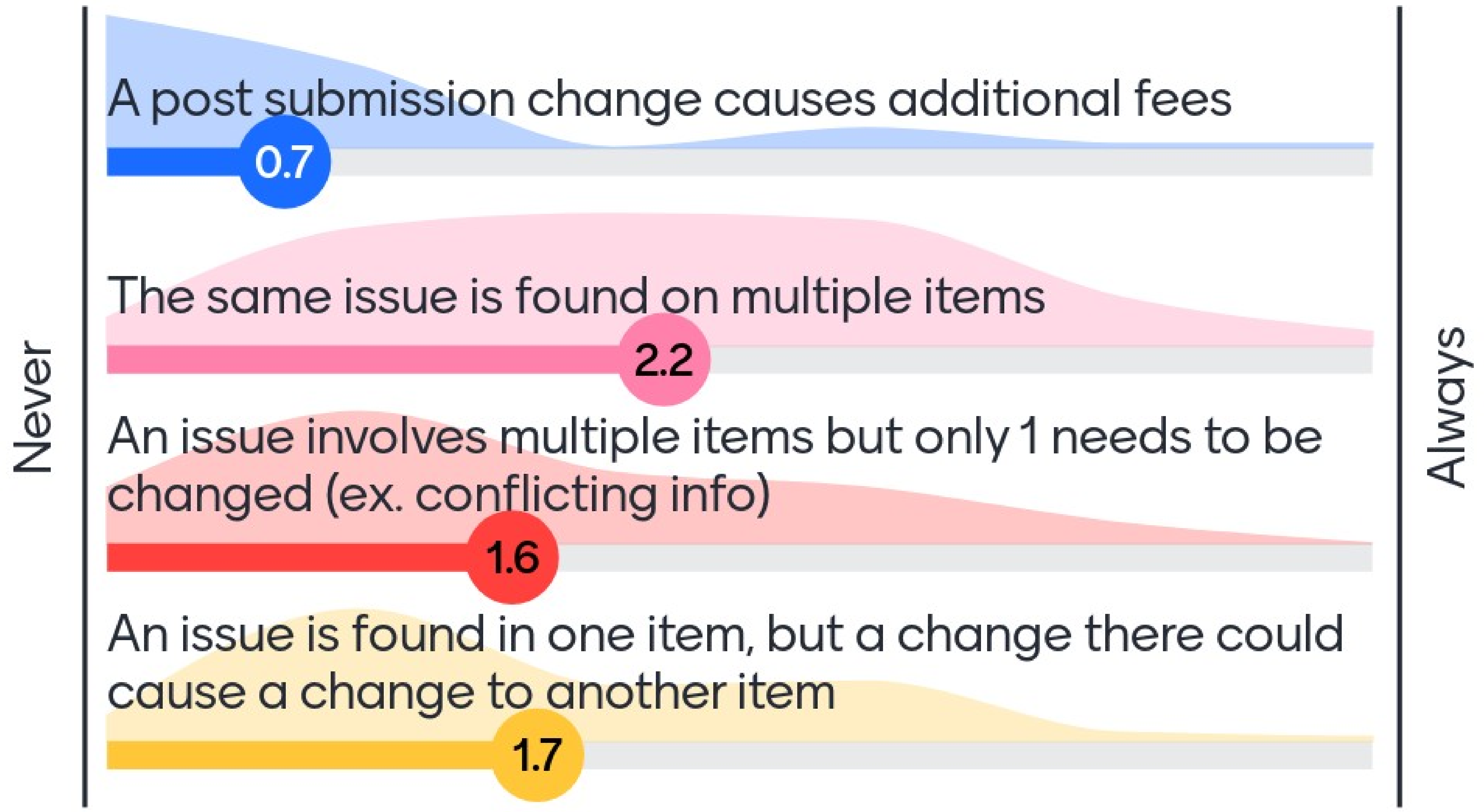
79

Does your intro and conclusion text have specific text for the particular objection letter?



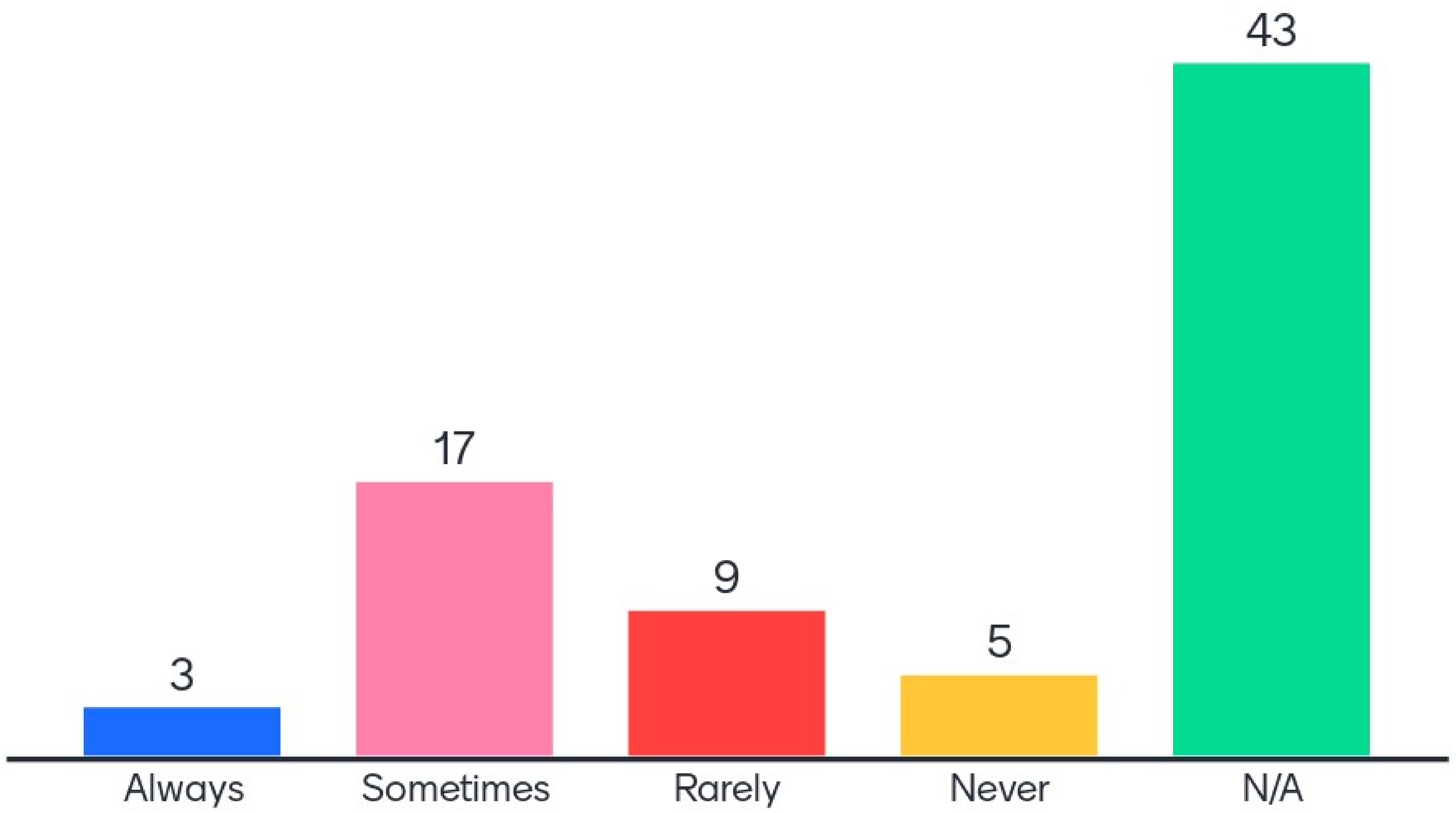
79

How often do the following scenarios occur?



2 78

Are there individual issues that are addressed with multiple quick text?



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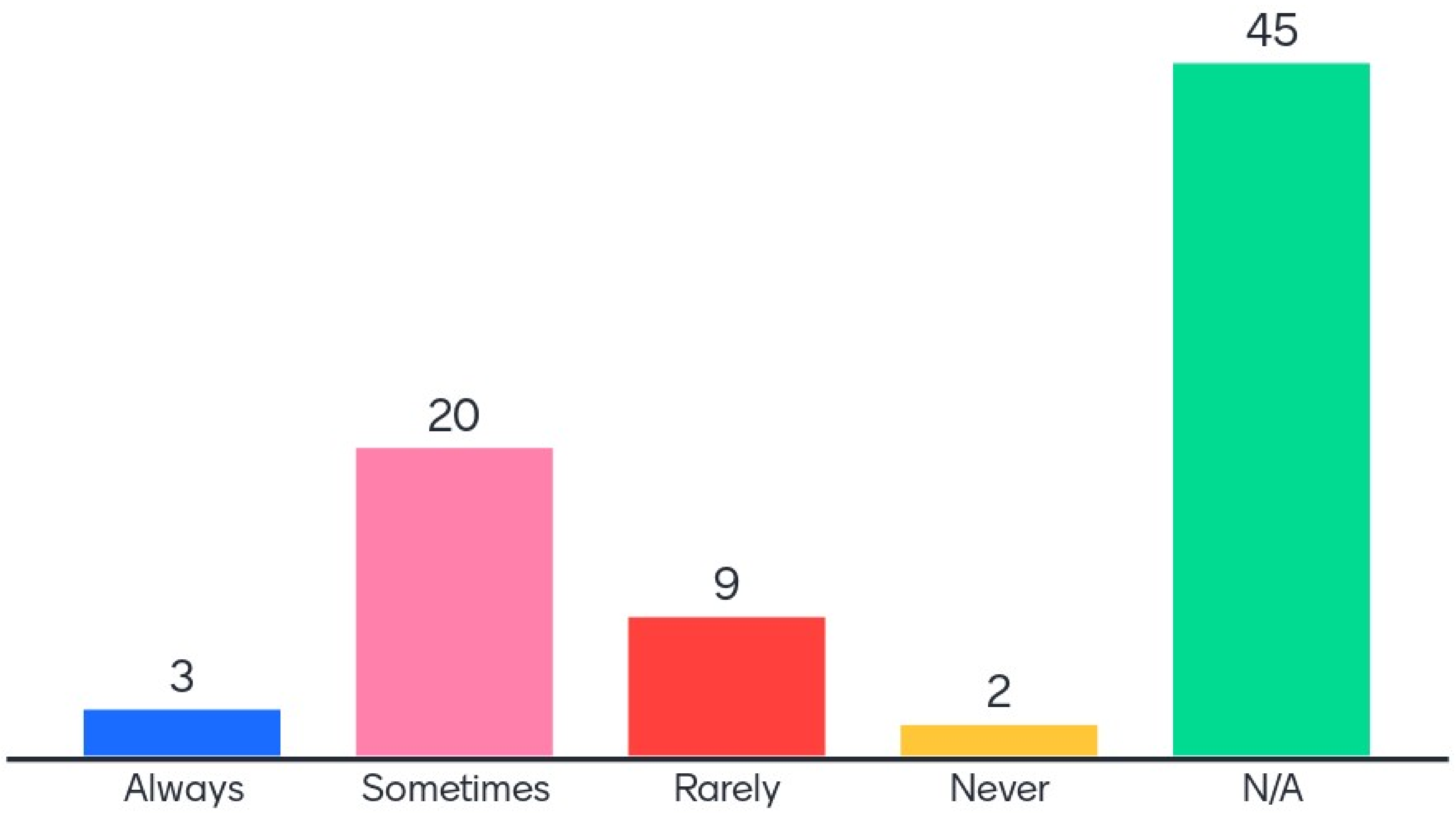
77

How often do you edit quick text during/after inserting it into an objection?



2 79

Do you have any suggestions for new terminology for objections/objection letters?

violations	Questions	Errors	Issues
Inquiries	Inquiry!	Inquiry	How about "Clarification request" ?

Mentimeter

2 62

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Do you have any suggestions for new terminology for objections/objection letters?

Concerns	Clarification	Oopsies? ;-)	Further Action Need instead of Objection Letter
Agree with violations statement.	Clarification request	We use "Comments" instead of "objections"	Filing Correspondence

2 62

Do you have any suggestions for new terminology for objections/objection letters?

Inquiry	Request for information	interrogatories	No
Response Needed	Inquiry should be an option if the department is only submitting a question. Objection would be if something needs to be addressed prior to approval consideration.	Follow Up	Clarification needed

2

62

Do you have any suggestions for new terminology for objections/objection letters?

Further Action Needed

State concerns / Industry, Filer Responses

Industry Review Feedback/Comment

Additional request

Changes Needed for Further Review

How about &*&^% You can't use 'macro parameter character #' in math mode%^!!!!!. LOL

Feedback or Guidance

Concerns or Further Action Needed

2

62

Do you have any suggestions for new terminology for objections/objection letters?

Follow Up	Corrections needed	We refer to them as "comments" in our comment letters to industry on a filing. Some of the items are truly comments rather than objecting to form language.	request for action
Clarifications	Discrepancies	Point of Clarification	"Query" (like Data on ST:TNG!)

2

62

Do you have any suggestions for new terminology for objections/objection letters?

Review Stop	SELECTION CHOICES - STATUTE VIOLATION, QUESTION, CLARIFICATION	Compliance Issue	Response Required
Questions, Correspondents	I have no issue with Objection	Edit requested	Inquirers and ConcernsFeedback or Guidance

2

62

Do you have any suggestions for new terminology for objections/objection letters?

Honestly, "objection" is the best.	question	Additional Information Needed	We're used to Objections.
"Shame on you" letter	ClarificationQuestionsMore Information needed	Verify Issues	Response requested

2
62

Mentimeter

Do you have any suggestions for new terminology for objections/objection letters?

Question; clarification; confirmation; affirmation; concern; required revision

ClarificationFurther Action NeededAdditional Information Needed

I have no issues with calling it Objection

Interrogatory

We send two types of letters: objections and clarifications. The first is those things that are in clear violation of insurance code; the second is when we just need a bit more information.

Supplemental Information Request for clarification requestsEditorial Changes Required for typos

Items Needing Possible Action or Clarification

I believe British parliament uses "Question Time"

2

62

Mentimeter

Do you have any suggestions for new terminology for objections/objection letters?

Statutory requirements

Objection is fine.

Marco Polo

no comment

No issues with current wording

Questions

May be say "Compliance Issue" or "Regulatory Issue". I do not think it matters if there is a question and it's called an objection.

I'm okay with 'objection' but having the 'objection' equal to the individual obj, esp when metrics present the obj letter with as 'objection' is confusing. So, more precise terms

2

62

Mentimeter

Do you have any suggestions for new terminology for objections/objection letters?

Review Stopped Due to Corrections Needed	comment	abeyance	Further Action Needed
I believe for consistency, objection should still be used	Correction needed	Objection works	Follow Up Request

2

62

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Do you have any suggestions for new terminology for objections/objection letters?

Clarification Letter?

Leave as Objection.

Notice

ClarificationCompliance issueAdditional Information NeededRegulation issueCorrection(s) Needed

Concerns or Recommendations regarding your submission...

I would want some category to remain that was clear that a problem was significant and must be changed. We do not want to have back and forth on items that are not negotiable.

sometimes "Objection - Fee required" would be better than just "objection"

Objection wording still works

2

62

Do you have any suggestions for new terminology for objections/objection letters?

I do like objection(s)	Action Required	Insurance Dept Question or Letter	Objection works!
Insurance Dept Questions	Action Letter	Request for supporting information, especially with regard to rate filings	I like Action Required also.

2

62

Mentimeter

Do you have any suggestions for new terminology for objections/objection letters?

States that send their objections in an attached letter rather than in the built-in format.

When printed can we have the affected forms fields collapsed so we mostly see the objection and response?

Adding the state contact information (email, phone number, etc.)

We would like the option to reject responses that are not submitted in the proper format, such as attaching a letter instead of responding in the objection/response format.

would like to be able to see an objection response due date without going into the letter itself

It would be amazing if we had a way to track each individual objection received on a filing rather than 1 objection but there were 10 items within it. However, I wouldn't want to cause any additional

If submitting directly into the Objection Response box allow more text to be inserted. Also allow formatting would be great too.

The selection list for the items to point an obj to is difficult. usually go to the sch, copy the # and use Find to have it highlight so I don't pick wrong one

2 62

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Do you have any suggestions for new terminology for objections/objection letters?

Be able to copy and paste from Word into the SERFF field and keep the spacing, hyphens, characters, etc.

Many times on the industry side, we submit multiple filings all at once to a given state. If there is an objection on one filing, it often will require attention on all of them all at once

(continued) work for either the reviewer or the industry side. On the industry side, we copy and paste all the objections within a letter and send them via email. Sounds like there may be a way

Reminders sent to email when Objection Reponses are coming up.

Create a template for company users to select from and populate

(continued #2) to automate that via a SERFF generated email. Another suggestion would be an 'objection report' so we can look for similar objections received from different states without that

No ability to track where rev of the resp is w/o changing the status

Standard response times for across all DOI's

2

62

Do you have any suggestions for new terminology for objections/objection letters?

(continued #3) being such a manual process like it is today.

Ability to close an objection or check it off as resolved by individual objection

Having the 'changed' items appear many times

Declaration of Opposition

add state/industry contacts in signature

Maybe I haven't seen the latest system updates, but are each objections individually identifiable? As in, even if 3 objection letters are sent, can each individual objection be given a unique number?

2

62

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Any other objection/response pain points?

N/A

Having multiple objections in one objection point can be challenging. Prefer to have each point separate.

Sometimes my notation in letters gets removed in a PDF pipeline like single quotation mark.

The term "objection" has been problematic for me because sometimes it's not an objection, but just a question, or even a notification, so another term would be helpful

They're very difficult to get out of the system and integrate with reports. that use filing data. The canned SERFF report for objection activity doesn't always have what is needed

It is painful when reviewers have objections with typos but they objected to a typo in your filing description.

Keep as one thread instead of only having to object again after the response is received

Finding a way to make objections free form while preventing users from submitting multiple objections under one entry so metrics are correct around the number of objections and responses.

41

Mentimeter

Any other objection/response pain points?

Finding a way to make objections free form while preventing users from submitting multiple objections under one entry so metrics are correct around the number of objections and responses.

As an Industry user we appreciate when objections include a specific statute. Otherwise, we don't know if it is actually required or just a state preference.

The ability to copy an objection letter with all objections - similar to copying a disposition letter. Changing the response date is a separate issue.

Will we be able to build our own library of quick texts?

It would be helpful if the list of open filings could be sorted by the date of the latest filer response letter.

Once an objection letter is responded to, it can't be responded to again so state users need to create a new objection letter with the same objections to allow the company to respond.

The current workflow seems fine. Would have to see an example to understand if another way is better.

Having a way to close objections that ultimately do not need a response. Perhaps ability to remove objections no longer needed.

41

Any other objection/response pain points?

The due date of the response does not automatically remind the State of an overdue response. (I use the reminder feature to build in checks for a response on the due date.)

Many different things to consider, new fees, new certifications, new forms needed, may go back and forth several times.

An ability to duplicate objections or entire objection letters would be nice.

Industry sometimes responds without providing a point-by-point response to the items in the state comment letter or by using generic responses like see the revised form, general information, etc.

Ability to set due date reminders / receive email alerts

Wish I could underline or bold specific objections or words within the objection to highlight a particular point

I agree! Being able to remove an objection.

I need more control over the objection numbering. If the filer fixed everything except Objection 3, the follow-up letter should not default my objection to Objection 1.

41

Mentimeter

Any other objection/response pain points?

Multiple objections in one letter but response does not cover all objections therefore those objections from the first letter need to be recreated for a second objection letter

Due date alerts

Being able to remove objections from the confines of a letter would be helpful. Multiple objections aren't usually related, and are hard to search through for the one objection you're looking for.

When you click on a form or rule within an objection response, it takes to you the form schedule and/or rate/rule schedule and not to the individual form and/or rule referenced in the objection.

When a filing is completely rejected instead of utilizing the objection process.

Ability to underline, bold, etc.

Being able to edit the objection stats - currently the only edit can be the respond by date

It would help to be able to copy entire objection into Excel (this is where we put all questions/answers internally for discussion.

41

Any other objection/response pain points?

Need a way to better identify Objections/Objection Letters/Responses by topic on Correspondence UI so don't have to open the Objection or Response to identify what the Objection pertains to.

Add the ability to hyperlink other filings to objection responses.

Not having the line-item objections broken out. Sometimes multiple objections are lumped into 1 item and we need to manually separate them for handling, then combine responses for submission

Please allow at least 2 weeks for a response to an objection. We need to consult with different departments and go through a Quality Review. One week is not ample time.

Some states put everything in the introduction area, then want the filer to cut and paste each issue into the one Objection response area.

If keeping the "envelope" of the objection letter, it would be nice if regulator could correct the obj letter status when wrong status is selected in error when submitting the obj letter.

For obj w/multiple items a resp is req in ea. But a lot of times one doc is subm to cover all. A way to close out the others would be great.

Easier way to edit objections and objection letters.

41

Any other objection/response pain points?

Able to remove an objection that may have been sent in error.Able to "recall" an objection letter in case you needed to add more to it, so multiple letters are sent.

Sometimes you cannot respond within each Objection to individually objections. I assume that is how the reveiwer sent the objection, buy wasn't sure if that could be more consistent.

Having to recreate objections that have not been responded to takes extra state time

Ability to insert quick text objections into a disapproval disposition instead of only into an objection letter

1 week is not always enough time to respond

SERFF stopping me from sending the objection letter without putting the objections in it. I've done that a couple of time where I send the letter without the items that I'm objecting too

Having separate response areas for each objection question

the intro and conclusion isnt really needed

41

Any other objection/response pain points?

When receiving multiple objections in one, but industry is unable to respond to one due to requesting an extension and that response is submitted as a note to reviewer.

Having a systematic way to be able to ask for an extension if you're unable to meet the response deadline.

When there are multiple questions within one question, we separate out into separate line items in Excel. An easy way to do this would be helpful.

Ability to amend objection letter after it is submitted

I like the idea of quick text for disposition comments

Email reminder for objection due dates would be a nice component

Nice to see repond by date to objections (obj letter) without having to go to correspondence tab & open the obj letter.

Ability to send same objections/objection letter to multiple carriers without copy and paste to each file for each carrier.

41

Any other objection/response pain points?

Should be a way to point to objections that have not been responded to without having to rebuild from scratch and resend

Character limitations within SERFF

Rich text in objections to allow for hyperlinks

Ability to delete or cancel an Objection Letter once sent.

make the response due date more visible rather than having to open the objection letter.

Adding charts and graphs to responses without have to create new supporting documents.

warning about to time out within the objection box you are creating

ability to edit or delete an objection

41

Mentimeter

Any other objection/response pain points?

Need a way to search through only my objection letters in SERFF. I often need to track down wording I used from a similar issue in the past.

the limited length of response space Unable to include tables.Formatting issues.

allow objection/response text to be searchable text

Love the suggestion to be able to delete or cancel the objs/obj letter

Being able to resize the boxes

Ability for state to close out an Objection if needed.

41