

Notice to All Carriers
June 2020

Over the past several years, the Department has allowed several required items in filings to not be included upon submittal, and then included upon objection. In that process, the Department feels it has been unable to fulfill the promise to provide prompt attention and efficient determinations on submitted filings. Therefore, beginning **July 1, 2020**, the Department will be enforcing the following filing standards. Please read and review carefully the requirements listed below.

The Department does not review or accept informational filings.

Rate Models must be filed in accordance with rate and rule requirements. A Notice to Property & Casualty Insurers for additional information regarding Rate and Rate/Rule Filings will be forthcoming.

NOTE: FILINGS DISAPPROVED FOR ANY REASON, WILL NOT BE REOPENED.

- 1. General information Tab:** The General Information tab in SERFF must contain a complete and detailed explanation of the filing. The Department will no longer rely on “see supporting documents” to find an explanation for the filing. The status of the filing in the domicile state must also be stated. If the Company is not filing in the domicile state, an explanation as to why, must be included. If this tab is not completed in full, the filing will be disapproved and will need to be resubmitted. You may include a cover letter in addition to this tab, but not in lieu of this tab. Be advised that a Filing Memorandum or Cover Letter is NOT an Actuarial Memorandum for the purposes of Rate and Rule Filings. You may find additional explanation of Actuarial Memorandum requirements in the Notice to Property & Casualty Insurers.
- 2. Required Documents:** The filing must contain all required Idaho forms and checklists. The Idaho certification form is attestation that the filing is complete and in compliance with all Idaho codes and rules. The filing checklist is confirmation that all forms and/or rates and rules have been reviewed for compliance with Idaho Code, prior to submission, and are complete and correct. These documents must be completed in full, with a current date and signature. Only the most current version of the checklist will be allowed. If any of the required Idaho documents are incomplete or missing, the filing will be disapproved and will need to be resubmitted.
- 3. TOI:** The filing TOI must be correct for the product submitted. If it is determined the TOI is incorrect, the filing will be disapproved. Please consult NAIC filing matrix for guidance. You may request additional assistance by contacting the Market Oversight bureau, Rates and Forms section for guidance at Companies@doi.idaho.gov.
- 4. Final Versions:** All attached documents on the Form Schedule must be in final versions. No redlined documents are to be attached on the Form Schedule. If documents are not in final form, the filing will be disapproved. All attachments in the filing must be in PDF format and text search enabled.
- 5. Form Numbers:** Form numbers on the submitted forms must match the form number on the Form Schedule. The Department will allow **one** objection for this error. If not corrected within **7** days, the filing will be disapproved.
- 6. Third Party Filers:** A signed letter authorizing an entity to file on the Company’s behalf must be included. It must be dated within the current year of the submission date. If the authorization letter is missing or incomplete, the filing will be disapproved.
- 7. New Products/New Company filings:** When filing a new product line, the form filing must reference the corresponding rate/rule filing, and vice versa. The Department will not review a form filing without the companion rate/rule filing. If the companion filing is not submitted within **5** business days, the

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Company will be asked to withdraw the filing until the companion rate/form filing is submitted. If the filing is not withdrawn within 5 business days of the request, the filing will be disapproved.

8. **Objections:** With the exception of Item 5, Item 7 and Item 9, if the filing receives an objection, the Company will have 14 days to respond to and cure any defects in the filing. The Department will allow for only one extension up to 14 additional days, if requested. If the Company does not respond within the allotted times, the filing will be disapproved.
9. **Redline Versions:** When forms are revised and submitted for approval, a redline version of the same is to be included on the Supporting Documentations tab for review. If it is not included, one objection will be sent, and the filing will be pended for 7 days. If the redline version is not submitted after 7 days, the filing will be disapproved.
10. **Variability:** Include a Statement of Variability (SOV) on the Supporting Documentations Tab. List each form, with an explanation of why it is bracketed. Include range levels and all possible language variations. Certify that if changes are made to the variability language, a new SOV will be filed with the Department.
11. **Withdrawn Forms, rates, rules:** Attach all withdrawn forms, rates and rules under the Supporting Documentations tab.
12. **MEDICARE Supplement Rate Filing:** Include exhibit(s) of actual monthly rates for all plans currently marketed, with all factors applied, as quoted to the applicant, for both nonsmoker/smoker, or preferred/standard. (Current MEDICARE Supplement rates are posted on the Department website)
13. **Advertisements:** Advertisements are to be filed under the same Type of Insurance (TOI) as was used for filing of the product being advertised.
14. **Equity Indexed Annuities:** The Director requires that all advertisements, disclosures, and illustrations be filed. This includes any advertising that will be used for contracts filed with the Interstate Compact.
15. **Reports:** Idaho does not accept annual Long-Term Care or Medigap reports via SERFF. Submit on the Department's website at <https://doi.idaho.gov/Company/Surveys>.
16. **Disability (Health) Filing:** Submit all provider directories. List marketed areas in Idaho. (Managed Care Plans have a 30-day consideration period)
17. **Group Out-of-State Filing:** Master policy and certificate for Idaho insureds must be filed with Idaho DOI. Attach certificate on "Form Schedule" and master policy under "Supporting Documentation". Certify that premium tax will be paid to Idaho.
18. **Group Disability Filing:** Indicate if for small group (≤ 50) or large group (51+) employers.
19. **Annual Ind/SG Health Actuarial Certification:** Small group due March 15th and individual due September 15th. Verify all requirements for Individual and Small Group as listed on "Submission Requirement" form.
20. **ACA Filing:** Do not submit Grandfathered and Non-Grandfathered filings together. Only minor changes can be made by amendment, otherwise, submit new filing.

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21. **Plan Management:** The URRT and actuarial memorandum are required to be submitted with a SERFF rate filing and with HIOS for ALL individual and small group health insurance rate filings that are not grandfathered or excepted benefits.

A shortened version of these rules is and will continue to be provided under the SERFF Filing Rules. Please keep and continue to refer to this document for guidance. The Company may contact the Market Oversight bureau, Rates and Forms section at any time for additional clarification. Rates and Forms maintains an email address for inquiry submission at Companies@doi.idaho.gov.