

Form & Rate Filing 101 (Life & Health)

Molly White
Manager,
Life & Health Section



Form & Rate Filing 101 (L & H)



L&H Section What are we here for?

- Review of life and health insurance policy forms
 - ▶ Contracts, certificates, applications, and related documents
- Review of rates (Medigap & long-term care)
- Review and analysis of various non-financial reports



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L&H Section

- Molly White – Section Manager
- Tonya Buscher – Senior Office Support Assistant
 - ▶ Administrative support and filings “intake”
 - ▶ Public kiosk appointments
- John Howser – Research Analyst
 - ▶ Rate filings
 - ▶ Reports



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L&H Section (cont'd)

- Barb Rummerfield – Product Analyst
- Barbara Ann Rummerfield – Product Analyst
 - ▶ Policy form filings for comprehensive medical, PPO and HMO policy documents
 - ▶ Each analyst divides incoming files by company – typically a particular company will always have its forms handled by only one of these analysts



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L&H Section (cont'd)

- Karen Zoellner – Product Analyst
 - ▶ Non-comprehensive health products
 - ▶ HMO Provider Contracts
- Lloyd Nichols – Product Analyst
 - ▶ LTCI, Medicare Supplement
 - ▶ general health products



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Statistics

- Average # of filings per week:
 - ▶ 2011: 117
 - ▶ 2012: 131
- Average weekly pages filed:
 - ▶ 2011: 3,567 pages per week
 - ▶ 2012: 4,939 pages per week



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Statistics

- Average time to first action:
 - ▶2011: 7 days
 - ▶2012: 5 days
- Average total analysis time:
 - ▶2011: 22 days
 - ▶2012: 25 days

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SERFF is our life!

- All policy forms and rates must be submitted via SERFF.
 - ▶SERFF is the mechanism by which we review, file, and collect industry filing data and forms.
- As such, we encourage all reports to be filed in SERFF as well.

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Missouri Insurance Update

Jennifer Franz
Product Specialist II
NAIC SERFF

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SERFF

- Released in 1997
- Designed to enable companies to send and states to receive, comment on, and approve or reject insurance industry rate and form filings.
- Used by state insurance regulators in the filing review and approval process.
- Fifty-two jurisdictions and nearly 3,600 insurers use SERFF for rate and form filings.

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SERFF Industry and SERFF State

The screenshot shows the SERFF web application interface. It includes a navigation menu at the top with options like 'Files', 'Settings', 'Filing Rules', and 'Reports'. Below the menu, there are several tabs for 'General Information', 'Form Schedule', 'Objection Letters', 'Amendments', 'Post-Submission Updates', and 'Dispositions'. The main content area displays filing details for 'Acme Company', including TOE (LOE Life - Other), Sub-TOE (LOE-000 Life - Other), Filing Type (Form), and Date Submitted (11/04/2012). It also shows the Product Name (NB6349HD (02/2012) (L)) and Implementation Date Requested (02/2012) (L).

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Best Practices

The screenshot shows the 'Post-Submission Update for' form in the SERFF application. It includes a 'General Information' section with fields for 'Project Number' and 'Status of Filing in Domicile'. There are also sections for 'Objection Letters', 'Amendments', 'Post-Submission Updates', and 'Dispositions'. The form is currently in 'Draft' status. At the bottom, there are two status indicators: 'This filing has a pending post submission update.' and 'This filing has post submission updates.'

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Who to Call and When

- When to call the State
 - ▶ Requirement questions
- When to call SERFF
 - ▶ Everything else!

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How do you SERFF in MO?

- Successful filings in SERFF:
 - ▶ SERFF contains state specific “General Instructions”
 - ▶ Additional “Filing Guidelines” are posted on our website:
 - ▶ <http://insurance.mo.gov/industry/filings/lh/index.php>
 - ▶ Still unsure about your filing? Call **BEFORE** you hit Submit!

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SERFF-ing success

- 90% of all incoming SERFF submissions are successfully received and assigned “as-is”
 - ▶ Our goal is to have 100%
 - ▶ Common reasons for “rejected” filings are posted on the same website as our Filing Guidelines:
 - ▶ <http://insurance.mo.gov/industry/filings/lh/index.php>

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Avoiding rejections

- Common Reasons for Rejected Filings:
 - ▶ Form numbers entered incorrectly in SERFF
 - ▶ Documents attached to the wrong tab in SERFF
 - ▶ Improper responses to our two “state specific” fields

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Variable text filings

- Tips to expedite filings:
 - ▶ Reduce variable text as much as possible
 - [Bracketed text]
 - Variable text is difficult to review and slows down the review process

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SERFF tools and tips

- Tips to expedite filings:
 - ▶ Take advantage of the product checklists posted on our website at:
 - ▶ <http://insurance.mo.gov/industry/filings/checklists/index.php>

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SERFF tools and tips

- Tips to expedite filings:
 - ▶ Make sure filings are designed to comply with Missouri law
 - ▶ Make sure the basic filing information is correct
 - ▶ Take advantage of the documents posted on our website at: <http://insurance.mo.gov/industry/filings/lh/index.php>

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SERFF tools and tips

- Tips to expedite filings:
 - ▶ Use the "Filing Description" in the General Information tab to your advantage!

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SERFF objection tips

- Tips to expedite filings:
 - ▶ Respond to each objection in SERFF in the "Comments" field, instead of attaching separate documents

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Not optimal

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Optimal

apply. Please revise this document, and resubmit.

Response 1:

Comments: *

The language was modified to read "adverse determination or grievance" which includes the other types of grievances.

Individual plans are mentioned in the next paragraph. While Missouri state law allows an individual plan to access a two level appeal process, the following language found in the PIRACA LTR Presentation (page 4334 from the CIP) states that a one level appeals process is more advantageous to the member:

"Second, although the DOL claims procedure regulation permits plans to have a second level of internal appeals, these interim final regulations require that health insurance issuers offering individual health insurance coverage have only one level of internal appeals. This allows the claimant to seek either external review or judicial review immediately after an adverse benefit determination is upheld in the first level of the internal appeals process. There is no need for a second level of an internal appeal in the individual market since the issuer conducts all levels of the internal appeal, unlike in the group market, where a third party administrator may conduct the first level of the internal appeal and the employer may conduct a second level of the internal appeal. Accordingly, after an issuer has reviewed an adverse benefit determination once, the claimant should be allowed to seek external review of the determination by an outside entity."

The language on page 2 under the heading "Appeal Process" has been modified to include other grievances.

The federal recession language has been deleted from the policy.

The timeframes have been modified where needed.

The description of the level 2 committee has been modified to meet the requirements of section 376.1365, RSMo. The statement that there is no committee review for administrative appeals has been deleted.

Section 376.1367, RSMo identifies the turn around time for a pre-certification in the

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SERFF dialog box to enter your response to objections.

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SERFF objection tips

- Tips to expedite filings:
 - ▶ Respond to each objection letter in SERFF
 - Unanswered objection letters lead to review delays

“Pending State Action” - company has responded to every objection letter.

FD: H21.000 - Other
 Sub-Tab: H21.000 - Other
 Filing Type: Form
 Assigned To: Holly White, MHA (primary)
 Date Submitted: 08/13/2012
 State Filing Description: 7

SERFF Status: Pending State Action
 State Tr Num: 1178172
 State Status: PENDING STATE ACTION
 Co Tr Num: A52463
 Disposition Date:

General Information	Forms Schedule	Rate/Rate Schedule	Supporting Documentation	State Specific	Composers and Contact	Filing Fees	Filing Correspondence
Pending Objections							
No Pending Objections							
Objection Letters							
Status	Created By	Created On	Date Submitted	Responded By	Response Created On		
PENDING COMPANY RESPONSE	White, MHA, Holly	10/30/2012	10/30/2012 01:06 PM	Berryman, Bridget	10/31/2012		
PENDING COMPANY RESPONSE	White, MHA, Holly	09/28/2012	09/28/2012 03:08 PM	Berryman, Bridget	10/24/2012		
PENDING COMPANY RESPONSE	Nichols, Lloyd	09/07/2012	09/07/2012 01:18 PM	Berryman, Bridget	09/11/2012		

Confidentiality

- SERFF accommodates confidentiality
 - ▶ Request confidentiality and provide a legal basis for it
 - ▶ Make sure all documents are marked and submitted separately
 - ▶ Confidential documents are not visible to the public
 - ▶ A filing can be public with confidential attachments

Interstate Insurance Compact

- Missouri joined IIPRC in 2009
 - ▶ Life insurance, annuity and long term care insurance
 - ▶ NAIC “Speed to Market” initiative
 - ▶ Centralized electronic filing portal
 - ▶ One filing = 41 markets
 - ▶ 2012 filings: 4,743
 - ▶ 2011 filings: 5,036



Senate Bill 749 Overview

- Section 191.724 – effective 9/12/2012
- Section 376.1199 – effective 10/12/2012
- DIFP Bulletins 12-02 and 12-03

See “Laws & Bulletins” tab at insurance.mo.gov

Section 376.1199

- Health benefit plans providing OB/GYN benefits and pharmaceutical coverage (§376.1199.1)
- “Health carrier” and “health benefit plan” as defined in 376.1350 (§376.1199.2)
- Numerous policy types excluded (§376.1199.3)