



## Division of Insurance Market Regulation

### Property and Casualty Filing Section General Filing Instructions

*The intent of this document is to offer general guidelines for the filing process to ensure expeditious reviews and speed to market. It does not constitute a legal opinion or legal advice. The following guidelines do not have the force and effect of law and should not be considered a statement of general applicability. These guidelines are not all inclusive and should be used in conjunction with the applicable statutes and regulations. The Department does not give rulings on filings that have not yet been submitted, and we do not offer legal advice.*

#### Filing Fee:

- All submissions are required to be filed through SERFF, MO does not accept paper filings.
- \$150.00 per submission per line, for each company, per Section 374.230 (6) RSMo.
- For Mutual Chapter 380 companies, the fee is \$10.00 per form, per Section 380.251.3 RSMo.

Types of Insurance (TOI): Please refer to the NAIC CDS Coding Matrix at [www.NAIC.org](http://www.NAIC.org) for a description of the available TOIs.

#### Filing Checklist

- The Department's Website includes line specific documents that contain some of the most common statutes and regulations. Companies are strongly encouraged to review these documents prior to submittal.
- Filing Checklist can be found at <https://insurance.mo.gov/industry/filings/checklists/>.

#### Required Filings and Effective Dates

- Forms

*Consumer facing documents including, but not limited to: policies, endorsements, required notices, declarations, applications. Section 379.321.6(3) RSMo allows for form filing exemptions for specific qualifying criteria.*

Line of Business	Requirement		Reference
Credit Insurance	File and Use	Forms must be submitted to the department prior to use. The insurance department may disapprove the form within sixty days.	385.045 RSMo
Dwelling Fire, Homeowners and Private Passenger Auto	File and Use	Forms are deemed approved upon receipt by the insurance department. The insurance department shall review the filing within 60 days and may schedule a hearing during that time.	375.920 RSMo



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Line of Business	Requirement	Reference	
Title	File and Use	Forms must be submitted to the department 30 days prior to use.	391.085 RSMo
Workers Compensation	Prior Approval	Forms must be submitted to the insurance department for specific approval.	287.310, RSMo; 20 CSR 500-6.100
Filings Submitted by Mutual Companies Operating under Chapter 380	File and Use	The insurance department shall review the filing and give written notification of the approval or disapproval of any form.	380.091 and 380.251 RSMo
All Other Lines	Use and File	Forms must be submitted to the department within 10 days after the effective date.	379.321 RSMo; 20 CSR 500-4.100

- Rates & Rules

*Rates include, but are not limited to: underwriting criteria, underwriting models, base rates, rating plans, territory definitions, credit models, tiering models, and manual rules. Rates should be filed in such a manner that a third party could recalculate any given insured's premium.*

Line of Business	Requirement	Reference	
Credit Insurance	File and Use	Rates must be submitted to the department prior to use. The insurance department may disapprove the form within sixty days.	385.045 RSMo
Title	File and Use	Rates must be submitted to the department 30 days prior to use.	381.181 RSMo
Workers Compensation	Use and File	Rates must be submitted to the insurance department within 30 days after the effective date.	287.947 RSMo
All Other Lines	Use and File	Rates must be submitted to the insurance department within 10 days after the effective date.	379.321, RSMo; 20 CSR 500-4.100

**NOTE:** When filing an attachment that contains rates and rules, use a Filing Type that includes “Rates” and “Rules”. This will ensure the most recent version of that rate and rule page can be easily found during a search. This is a helpful practice even if only the rules are being revised. Please note that if rates are included within a rule only submission, the company may be requested to withdraw and refile using a filing type that includes rates.

Filing Specifics

- Electronic Submission – All forms, rates, rules, and reports should be submitted via SERFF, as the Property and Casualty Section no longer accepts paper submissions.
- PDF – All attachments should be submitted in PDF format.
- Line Items – Each line item should contain one attachment. If a document exceeds the page count to be submitted as one attachment, submit as separate line items.

- General Information Tab
  - Effective Dates – effective dates should comply with the specific line requirements as referenced above. “Upon Approval” does not reflect a compliant date. Please ensure the effective date field(s) reflect an actual date.
  - Filing Description – a general summary of what is included within the filing.
- Form Schedule Tab
  - Consumer facing documents
  - The Form Name of each attachment should be clearly identified within the Form Schedule Tab
  - Form Type should clearly state the intent of each form. If a company selects OTH (Other) form type, include a description of how and why this form did not qualify as a more specific form type.
  - If the company is submitting a form containing provisions amended by a Missouri Amendatory Endorsement, attach a copy of the Missouri Amendatory Endorsement.
- Rate/Rule Schedule Tab
  - Complete all rating fields that apply to the last rate filing submitted by the company.
  - Complete all rating fields that apply to the current filing for each company. If there is not a rate in effect, zeros should be entered.
- Supporting Documentation Tab
  - Filing Memorandum – A detailed description of the content within the filing. Examples include: detailed summary of the changes made to the product, target market, the company’s business plan, organizational structure, product life cycles, and other important back ground information that may be beneficial for understanding the contents of the filing.
  - Exhibit A, B, &C (20 CSR 500-4.200) – Required filing documents shall be included for “all insurer filings which refer to a rating organization prospective loss costs reference filing”.
  - Actuarial Justification – Should be included for all rate related filings. This attachment should include the company’s statistical, actuarial, and intuitive reasoning for such rate adjustments. Justifications may include, but are not limited to: a signed statement from the company actuary detailing their credentials, entire models, statistical reports, third party data and information, loss data, frequency and severity reports, etc.
  - Redline Document – Demonstrates changes from existing product contents. For example, if the company is affiliated with an advisory or rating organization, any company deviations from the original organization’s product may be demonstrated through the use of a redline document.
  - Confidential Attachments – If a company has requested that specific information be held as confidential and has provided the appropriate legal basis, the attachment should be submitted within the Supporting Documentation Tab accompanied by the confidential marker provided by SERFF. See the Public Access and the Confidentiality Section for more information relating to confidentiality.
- State Specific Tab
  - Complete the NAIC number for each company.
    - NAIC Codes may be found at:  
<https://sbs.naic.org/solar-external-lookup/>
  - Failure to include this information may result in a filing being rejected.
  - Companies should confirm that the General Instructions Document has been reviewed.

- **Companies and Contact Tab**
  - Ensure Filing Contact Information, including the name and phone number of the filing contact is correct and up to date. Auditors will use this information to streamline reviews, if necessary.
  - Each company should include a valid Company Name, CoCode and Group Code. Failure to include this information may result in a filing being rejected.
  - If multiple companies under one parent company are filing identical information for all companies, one filing may be submitted for all companies. All content submitted must apply to all companies and to all lines.
  - “Me too” filings can be submitted for affiliated companies when the original filing has been submitted in SERFF. This can also be done when the referenced company is affiliated to the filing company and the original filing was submitted as a paper filing after July 1, 2007.
  
- **Filing Fees Tab**
  - The general filing fee is \$150.00 per line, for each company, per Section 374.230 (6) RSMo.
  - For Mutual Chapter 380 companies, the fee is \$10.00 per form, per Section 380.251.3 RSMo.
  - Payments should be made via electronic funds transfer (EFT) at the time the filing is submitted. If you do not remit payment via EFT, this could result in the filing being rejected. As long as the filing is still open, EFT payment can be submitted.
  
- **Filing Correspondence Tab**
  - Objection and response letters should be used to discuss specific contents of the filing. Reviewers will submit clarifying questions and regulatory concerns via objection letter.
  - Once a company is able to address all objections, they should submit a response letter. If additional information is required to provide an adequate response, then a separate document should be placed within the Supporting Documentation Tab. All revisions to filing contents should be provided within the appropriate Form or Rate/Rule Tab, in which the attachment was originally submitted.
  - Amendments should be used to make substantial changes to a filing prior to disposition. For example, the removal or replacement of filing attachments.
  - Post Submission Updates (PSU) should be used to provide updates to the General Information Tab such as product information or effective dates. PSUs should also be used to update the previous and current rating information that appears within the Rate/Rule Schedule Tab.
  - Dispositions are submitted by a reviewer once the review of the filing is complete and has been closed. See the Disposition section for more information about specific disposition statuses.
  - Filing Notes are used for general inquiries regarding a filing, such as extension requests or conference call requests. Please note that SERFF allows 24/7 access to the status of filings. For this reason auditors may not respond to status inquiries.
  - Unless a filing is time sensitive by law, filings are reviewed in the date order in which they are received. If a company has specific questions regarding the review of a filing, please feel free to reach out to the reviewer directly. Do not use Filing Notes to address objection letter inquiries.
  
- **Disposition Status**

<b>Status</b>	<b>Applicable To:</b>
Approved	<ul style="list-style-type: none"> <li>• Workers Compensation Forms</li> <li>• Homeowner and Personal Auto Forms including policy forms, applications, declarations, policy jackets, endorsements and policyholder notifications per Section 375.920 RSMo.</li> </ul>

Status	Applicable To:
Filed For Informational Purposes Only	<ul style="list-style-type: none"> <li>Commercial Lines Rates including rate plans, modifications, and manuals of classifications per Section 379.321 RSMo.</li> </ul>
Reviewed	<ul style="list-style-type: none"> <li>All other forms, rates, and rules for lines of business not listed above. <i>Please note that “reviewed” does not mean approved. “Reviewed” means that the filing has been reviewed for compliance with Missouri law and has been closed.</i></li> </ul>
Filed	<ul style="list-style-type: none"> <li>Reports including membership and statistical reports.</li> </ul>

- Closed Filings
  - Once a filing has been closed, the contents of the filing can only be revised, amended, or corrected by submitting a new filing and incurring a new filing fee, per Regulation 20 CSR 500-8.100(1)(C).
  - **Exception:** *Companies may amend the effective date for closed filings by using a Post Submission Update as long as:*
    1. The company certifies that the filing has not been implemented or utilized.
    2. The request is submitted via Post Submission Update in SERFF.
    3. The request is made within 30 days of the original disposition date OR prior to the original effective date.
- Public Access
  - Filings submitted for review are set for “public access” upon disposition, unless a company specifically requests that a document be held confidentially. Please note that public access is not set until the review of a filing is complete and a disposition has been submitted.
  - If your company desires to have an attachment held confidential, a formal request will need to be submitted via SERFF. See the Supporting Documentation Tab Section and the Confidentiality Section for additional information relating to Confidentiality.
- Confidentiality
  - Specific attachments may be requested to be held confidential if the company submits a formal request via SERFF, the SERFF Confidential Marker is applied to the attachments, and if the company cites the applicable portion of Missouri Law that would close the record. See 20 CSR 10-2.400.
  - Please note that entire filings should not be marked as confidential. Only specific attachments should be submitted as confidential.

*For additional information or questions regarding the filing process, please contact the Property and Casualty Filing Section at [PC@insurance.mo.gov](mailto:PC@insurance.mo.gov).*