

15th CILA Seminar

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Product Regulation – Context Setting

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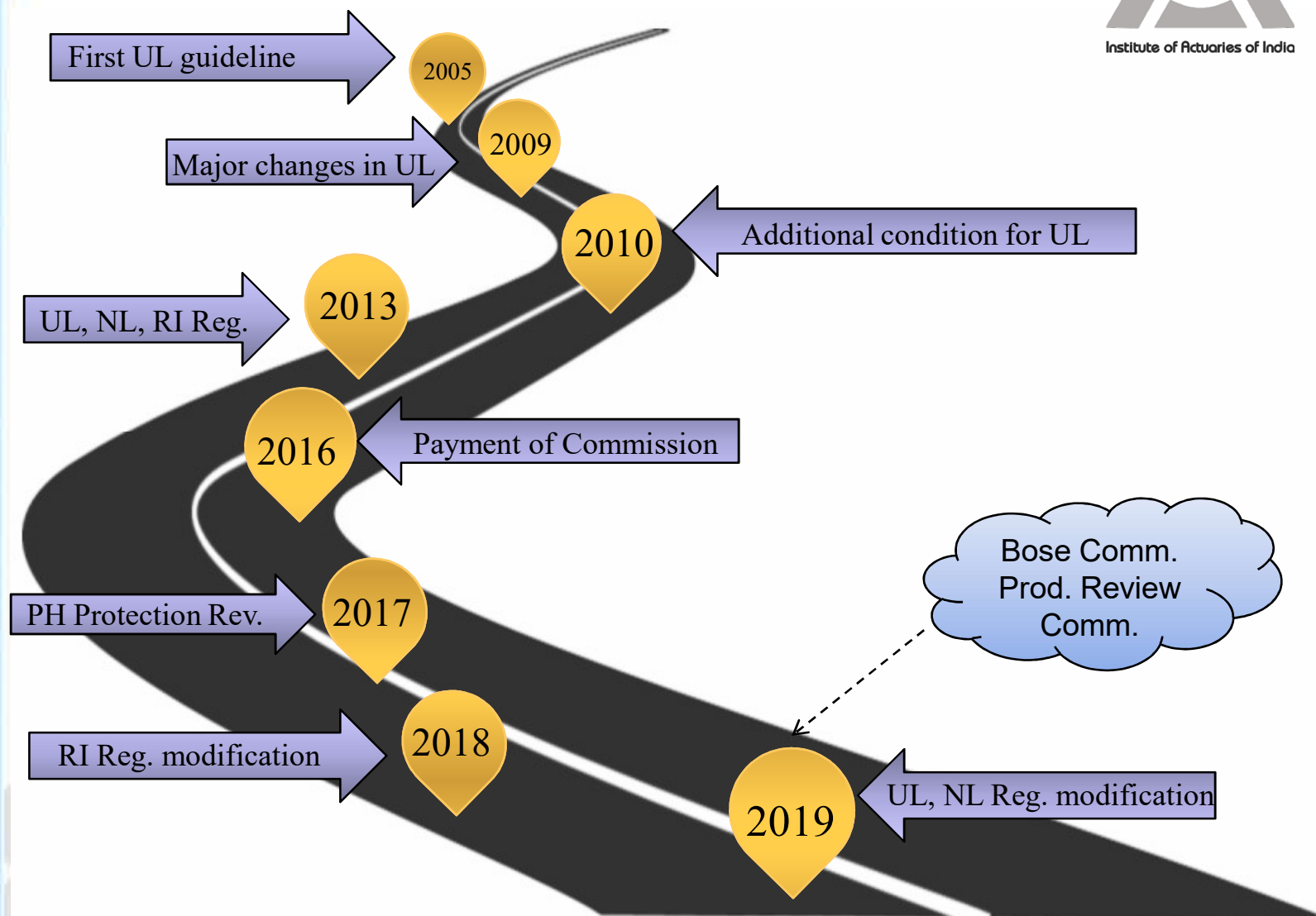


Agenda



- Evolution of Regulations & Guidelines
- Product Regulation 2019
- Benefit Illustration
- Use & File Overview
- Implementation Challenges

Evolution of Regulations & Guidelines



Product Regulation 2019

Overview



Greater focus on customer protection aspects



Simplification & more standardization- min death benefit, removal of VIP, specifying product categories



Flexibility in Term Insurance products



Participating
Life Insurance

Special focus on With Profit Management

Overview (cont.)



Revival period increased



Special focus on customer IRR



New initiative towards innovation – Sandbox regulation



Linked expenses and commissions with respective regulations

Overview (cont.)



Formalized customer education and training to intermediaries



Use & File procedure – increased the scope



Requirement for reviewing product viability once a year and submit as part of annual report

Non Linked Products

Surrender Value



- Policy acquires Surrender Value after payment of two full years' premium
- For Par Special Surrender Value (SSV) shall represents asset share and need to be smoothed to maturity value
- For non par savings, SSV shall reflect the guaranteed maturity or survival benefits



Non - Linked Products

Other Highlights

➤ **Group Savings**

- No VIP products
- Crediting interest rate and charged expenses have to be as per Board approved formula



➤ **Pension & Annuity**

- Option to commute upto 60% is allowed
- Policyholder can purchase certain part of annuity, currently 50%, from another insurer

With Profit

- With Profit Committee to constitute Independent Director, CEO, CFO, AA and Independent Actuary
- The criterion for appointment of Independent actuary modified
- **WPC Report to include**
 - Methodology and justification for any change
 - Bonus Earning Capacity
 - Sensitivity of Bonus Rates and basis
 - Note on Policyholders' Reasonable Expectation (PRE)
 - Any change in Special Surrender Value
 - Treatment of Future Fund Appropriation (FFA)
 - Appropriateness of expenses
- WPC report to be shared with the Board before finalization of year – end financials





Linked

- Check for NNCA simplified – only at pricing stage, for specific rates
- Higher up-fronting of charges; however reduction in yield criteria remains same
- On discontinuance after lock-in period policy will be paid up by default. Fund value will be paid after revival period (if not revived).
- Risk coverage needs to be maintained during settlement period
- Option to reduction of premium and benefits after 5th policy year
- Whole life policy term is at least up to attainment of age 80 years
- No minimum guarantee for UL pension

F&U Checklists



- Exhaustive checklists covering all possible questions concerning about the product
- Demonstration of positive IRR for Non Par
- Demonstration of positive IRR for Par @ 4% p.a. growth rate
- In ULIP to ensure 90% premium return at maturity
@ gross investment yield of 4% p.a. after all deductions.
- Justification for Nil or very high NB strain

Benefit Illustration



- To highlight Guaranteed benefits
- For Online channel- BI before application and premium payment
- Annual policy statement with premium, bonus, fund value (UL) etc
- Financial Planning for Pension products –
 - Customer specific target purchase price
 - Possible risk involved
 - Target annuity
- Annual disclosure for Pension stating accumulated amount, expected accumulated value on vesting, likely annuity amount at vesting



BI - Suitability

- Specific training for intermediaries selling UL on capital market developments, risks involved in UL
- Suitability analysis
 - To collect ‘Suitability information’
age, income, family status, financial
and family goals etc
 - Determine if a product is suitable considering customer’s status and
policy related conditions
 - Suitability info to be stored and produced if required
 - Requirement for Board Approved Policy



BI – Policyholder Education



Policyholders' Education

- To promote education on UL product
 - To put up product specific presentations on website
 - Premium calculator without requirement of policyholder's details
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- Periodical review of product wise new business performance – actual vs projected
 - Special care should be taken on advertising material of UL products and the associated funds.

Use & File Overview



- Enhanced the conditions applicable for Product modifications under Use & File process
 - Changes in premium and benefit amount on account of 2019 product regulation
 - Changes in premium and benefit amount for non linked non par (incl. annuity) due to change in interest rates with increased frequency
 - Changes due to mortality, morbidity, expense, lapse basis for non linked products with certain threshold of change in premium rates
 - Addition of approved riders, premium frequency, distribution channel, approved fund (in UL)
 - Min/ Max premium, benefit amount, premium table extension
- Additional provision for modifications without changes in UIN
- The complete responsibility of the correctness of statements/ documents is vested with CEO/AA



Implementation Challenges



- Significant number of on-sale products need to be restructured
- Major work to modify IT system, including the peripheral ones
- One time administrative costs
- Use & File procedure provides significant relief to insurers
- Also implementation date extended

THANK YOU