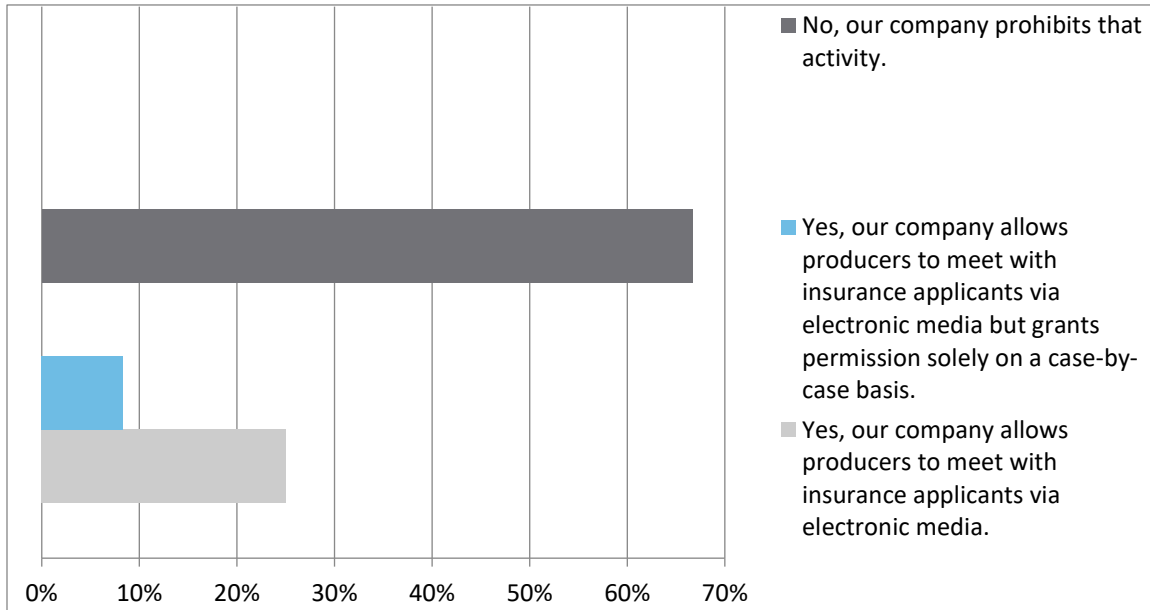


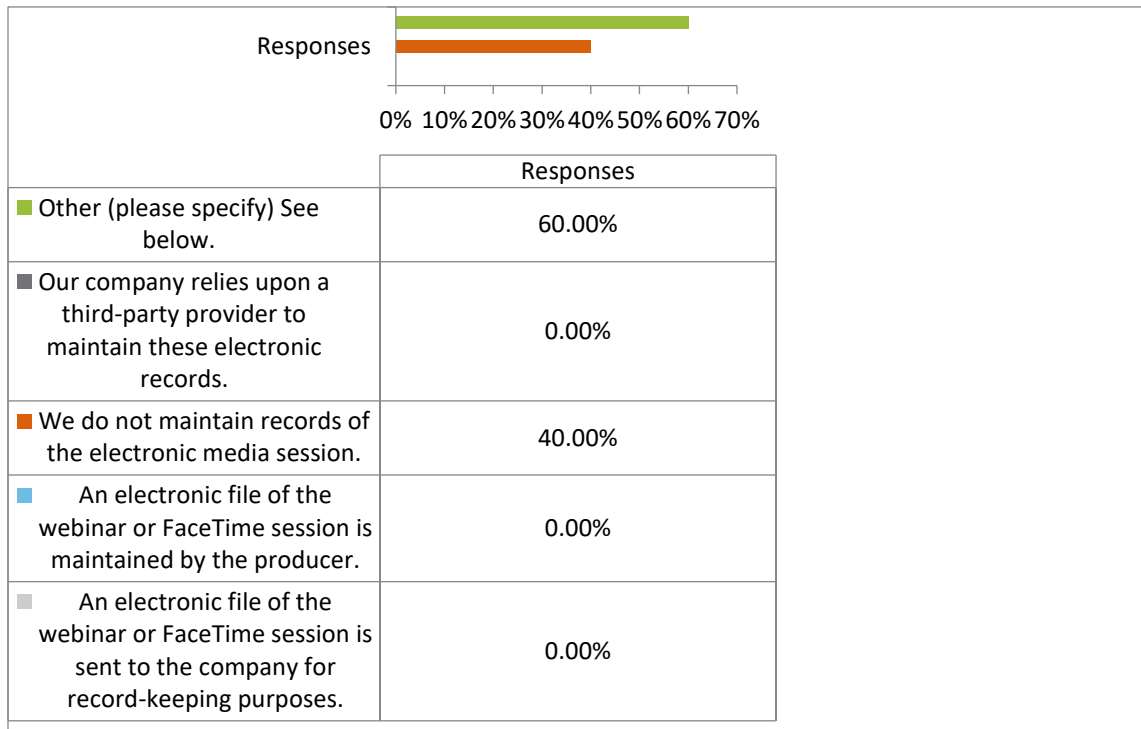
CEFLI Quick Poll: January 2020

Policies and Procedures - Authorization to Allow Producers to Accept Application Information Via Electronic Media

1) Does your company allow a producer to meet with insurance applicants via electronic media such as a webinar or FaceTime to take information to complete an application electronically?



2) Does your company keep records of the electronic media session?



Other:

- Not Applicable.
- We sell via phone, but not via a visual mechanism. All of our phone calls are recorded and stored.

3) What types of compliance issues have you encountered, if any, when considering whether to allow producers to meet with insurance applicants via webinar, FaceTime or other electronic media? Please explain.

- We require the producer document that he/she did not physically meet with the client. The producer must obtain the physical documentation of the client's identity. The producer must also be properly licensed and appointed where the client is located.
- The filing requirements for the application are not clear. Additionally, if these are considered "agent sold" products, it is difficult to find a mechanism by which to exchange required documentation for agent sold business.
- None at this time- we use this method very selectively with our Workplace enrollments only at this time.
- Call recording quality.
- Cross border sales issues. We require the completion of our application for new business and must approve the use of e-signature.
- To date none that I am aware of.
- Consideration with app solicitation state (if the producer is in a different state than the applicant), Know Your Customer concerns, ensuring the applicant has received all required marketing materials.
- Timing of receiving a consent to conduct business electronically.
- Issues with e-signature for electronic application. Agents have used email addresses they control to authorize transactions.
- We don't encounter them because we don't allow it. All sales are required to be in a face-to-face meeting, since our agents are responsible for field underwriting, which requires seeing all proposed insureds and to verify that they exist and appear reasonably healthy - no physical evidence of health or cognitive issues.