

The following is an annotation of NAVA's Standards regarding use and management of an Electronic or, "E-Forms" Repository used in the annuity sales transaction. In the annotations, assignment of responsibility is established along with key points which should assist those charged with implementing the Standards.

63.1	E-Forms generated and applied by the process owner may be retained in the appropriate library of the process owner in a state that is proprietary to the technology provider (i.e.; the manufacturer of the E-Forms software products used by the process owner.)
	<ul style="list-style-type: none"> • The normative definition of a 'form' for the purpose of NAVA STP is any electronic document containing a mix of static and variable content where all or part of the variable content is provided through dynamic interaction with a person whether that interaction includes furnishing information by entering data into the form or simply by applying an electronic signature to the form. • This Standard focuses on electronic 'interactive' forms where software logic may dynamically modify the form content and / or structure based on information provided to the form whether that is from the person (or, persons) completing the form, databases, or other business applications that may work with the form during completion. • It is recommended that all forms whether 'interactive' or not be managed using industry standard document management principles. Used in the electronic state, these forms employ the use of field 'tagging' which is arguably a type of dynamic structure hidden from the customer's view and capable of changing substantive characteristics of the form one transaction to another. These should be versioned and retained for future use as may be required. <p>Responsibility assigned to the Distributor and Insurer.</p> <ul style="list-style-type: none"> • The "process owner" is either the Distributor or the Insurer responsible for any portion of the annuity sales transaction. <ul style="list-style-type: none"> ○ This designation can be applied also to the party responsible for any given form template. • Notwithstanding requirements governing the final state of an E-Form, how the form is operated on during its active state is subject to the process owner's (Distributor or Insurer as appropriate) business application. This allows for a primary or proprietary library for E-Form templates.

63.2	<p>If the primary library is proprietary then a secondary library must be established in which the presentation layers of the E-Forms are replicated in ISO PDF/A. Also, the rules layer must be replicated into a table in such a fashion as to clearly list and describe all rules applied to the E-Form.</p>
	<p>Responsibility assigned to the Distributor.</p> <ul style="list-style-type: none"> • If the process owner uses a proprietary library for E-Form templates, the process owner has to create and maintain a secondary library where the same templates and their versions are maintained in ISO PDF/A formats. • This recognizes the fact that E-Form templates are as much a record of the transaction as the completed form derived from these templates.
63.3	<p>The primary library for E-Forms templates must support basic document management functions.</p> <ul style="list-style-type: none"> • Versioning with all versions of the documents held in the document management repository. • The ability to “check” documents out of and into the system. (Check-out locks the document from changes and also shall support “legal hold” functions.) • Full audit of accesses to and activities engaging documents contained in the document management system. • Access security shall be applicable at the system level, filing levels, and the individual document level. <p>Access will be granted only as required to support roles and responsibilities specific to the individual transaction. These rules apply to the secondary library, as well.</p>
	<p>Responsibility assigned to the Distributor.</p> <ul style="list-style-type: none"> • The primary E-Forms library must follow basic document management protocols for versioning and control. • The secondary library, if one is required, must align with the primary with regard to versioning. • Forms held in a secondary library cannot be modified directly rather any modifications must be moved through the primary library with the outcomes replicated in the secondary library. This establishes the secondary library as a ‘copy’ of the primary library.

63.4	E-Form templates are to be considered as legal records related to all the transactions in which active form extracts were made and, as such, managed in accordance with the NAVA Standards 2006-72 for Records Retention & Management.
	<p>Responsibility assigned to the Distributor.</p> <ul style="list-style-type: none"> • The legal record status of E-Form templates should be sustained at all times. • No instance of any E-Form template if ever used in a transaction is to be permanently deleted. • Out-of-use or 'expired' E-Form templates should be reposed in the same records management system which holds other records of the transaction. • The version and other critical references to the template necessary to associating it with subscribing transactions should be included in the record metadata.
63.5	Electronic forms provided to the customer as "Customer copies," regardless of state of completion, must be rendered in ISO-standard PDF so as to support faithful printing and viewing by the customer in accordance with NAVA Standard 2006-31 for E-Delivery of Documents.
	<p>Responsibility assigned to the Distributor.</p> <ul style="list-style-type: none"> • Customers may be allowed to download electronic forms to their private systems for review purposes only. • Any customer operations on any electronic form should only occur through presentation by the Distributor's systems via the Distributor's portal in line with industry standard practices with regard to 'safe harbor' requirements.

CROSS REFERENCES	
<u>REFERENCE</u>	<u>SOURCE LOCATION</u>
STP Process Model Reference Links <ul style="list-style-type: none"> ❖ Account Opening ❖ Product Presentation ❖ Selection and Order Entry ❖ Principal Suitability Review ❖ Application Process ❖ Insurer Application Process 	
Related Documents	Position Paper Regarding E-Form Structure and Management NAVA – Open Standards Position Paper SEC Regulation 17a-4 NASD 3110 on Books and Records STP Glossary of Terms
Check lists	Check List for Implementation
STP Standards	All STP Standards