

*The following are the Implementation Guidelines for the Standards for electronic delivery of disclosures, forms and documents (“Documents”).*

31.1	All documents introduced into the STP Standards transaction shall be conveyed in electronic formats.
	<ul style="list-style-type: none"> <li>• <b>The obligation of both the receiving insurer and the selling distributor.</b> <ul style="list-style-type: none"> <li>○ <b>Forms &amp; documents matrix (<i>insert Judy’s document</i>)</b></li> </ul> </li> <li>• <b>Includes 1035 documents.</b> <ul style="list-style-type: none"> <li>○ <b>Ceding/surrendering accepts electronic signature</b></li> </ul> </li> </ul> <p><b><u>NON-PARTICIPATING PARTIES</u></b></p> <ul style="list-style-type: none"> <li>• <b>Some insurers and, potentially, mutual fund companies not supporting STP may not accept electronic signatures.</b> <ul style="list-style-type: none"> <li>○ <del><b>Suggestion: Establish a central repository of participants/non-participants for reference by AOE’s.</b></del></li> <li>○ <del><b>Suggestion: NAVA publishes a “conforming” members list (may not be sufficiently real time).</b></del></li> <li>○ <b>Suggestion: Establish new entry in PPfA.</b> <ul style="list-style-type: none"> <li>▪ <b><i>Rick to consult Data Conformity</i></b></li> </ul> </li> </ul> </li> <li>• <b>[Need to develop a common industry statement that can be transmitted with electronic / e-signed documents that ‘educates’ the non-STP participating companies.]</b></li> <li>• <b>An expansion of 5.6.3 (version 5.3+)</b></li> <li>• <b>An expansion of 3.04 ~ 3.05 (version 5.3+)</b></li> </ul>
31.2	The responsibility and liability of making available current electronic versions of required documents resides with the entity responsible for the generation of those documents (“Content Author”). Refer to the NAVA Forms & Disclosure Matrix for information on who has the responsibility for which document.
	<ul style="list-style-type: none"> <li>• <b>There is a corresponding responsibility on the part of the distributor or, 3<sup>rd</sup> parties (e.g., “Paperclip”, “iPipeline”, “LaserApp”, “Corelink”) to use the most recently provided documents by the carrier.</b></li> <li>• <b>Carriers should update agreements with these 3<sup>rd</sup> parties requiring them to use the most current version of the carrier’s forms. If not, they are denied NAVA certification.</b></li> <li>• <b>Rick will take issue to FSI work stream.</b></li> </ul>
31.3	Regardless of source format, all final documents shall be rendered in ISO-standard PDF. Information on the rendering of electronic forms shall be in accordance with the policy set forth in NAVA Standards 2006-71 for Document Management and NAVA Standards 2006-72 for Records Retention & Management.

	<ul style="list-style-type: none"> <li>• All records are reposed in PDF (A).</li> <li>• Should emphasize ISO PDF.</li> <li>• (Table the discussion wrt to starting process with PDF-A versus converting from some form of PDF (or other) into PDF-A)</li> <li>• Once completed, rendered to ISO PDF 19005 –A.</li> </ul>
<b>31.4</b>	<p>In all circumstances, the presentation content and basic structure of the document shall not be altered by any party other than the content author.</p> <ul style="list-style-type: none"> <li>• Where documents are static in nature i.e., requiring no customer interaction other than receiving the information, these documents should be rendered 'locked-down' in ISO-standard PDF.</li> <li>• Where documents are not static and require customer interaction i.e., forms, these shall be collaboratively operated with, but not delivered to, the customer for data input e.g., accessed by the customer over the Internet, rather than delivered to the customer via e-mail. Access to such documents shall be provided through their Distributor portal. When these interactive documents are completed and signed, they will be rendered into an ISO / PDF(A) and 'locked-down'.</li> </ul> <p>Documents shall be managed in accordance with the policy set forth in NAVA Standards 2006-61 for Locking &amp; Binding Signed E-Forms.</p>
	<ul style="list-style-type: none"> <li>• <b>Key Points are:</b> <ul style="list-style-type: none"> <li>○ When document is “open” format can be proprietary or non-PDF.</li> <li>○ When operations on the document are concluded indicated by the application of an e-signature, the document must be rendered into PDF-A for records management purposes.</li> <li>○ Customer access to the document is restricted to Distributor’s portal.</li> <li>○</li> </ul> </li> </ul>
<b>31.5</b>	Print output shall be faithful to the electronic view of the document as legally required: e.g. line endings, page endings, paragraphs, bold type, and font size.
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<b>31.6</b>	The entity responsible for the content of any document used in the transaction shall provide access to those documents to other participating parties in the transaction. These documents shall be maintained in formats and renderings as set forth in these standards.
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<b>31.7</b>	The entity responsible for delivery of any document to the customer must have a process in place to ensure that the most current document that has been made available by the party responsible for the content of the documents shall be

	delivered to the customer.
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<b>31.8</b>	Each party shall establish repositories of the most current version of their required documents. Those documents shall be retained in the required formats as set forth in these Standards. Access to these repositories shall be made available to trading partners and will be reflected in their trading partner agreements.
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<b>31.9</b>	All documents introduced into the STP Standards transaction shall be retained and content preserved by the Distributor in their Records Management system as legal record of the transaction in accordance with the policy set forth in NAVA Standards 2006-72 for Records Retention & Management.
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<b>31.10</b>	All consents legally mandated for participation in electronic transactions shall be presented to the customer. The consents obtained shall be in accordance with the policy set forth in NAVA Standards 2006-93 for Customer Consents.
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**CROSS REFERENCES**

<u>REFERENCE</u>	<u>SOURCE LOCATION</u>
<a href="#">NAVA STP New Business Flowchart</a>	Locations: 1.0, 2.0, 3.1, 4.2, 7.0, 7.2
Position Papers & Related Documents	<a href="#">NAVA Position Paper Regarding E-Delivery</a> <a href="#">NAVA Forms &amp; Disclosures Matrix – New Business</a>
SPeRS Citations	<a href="#">SPeRS Table of Contents</a> Sections 2.1, 2.3, 2.5, 3.6, 5.3
Other NAVA STP Standards	<a href="#">NAVA Standards 2006-61 for Locking &amp; Binding Signed E-Forms</a> <a href="#">NAVA Standards 2006-71 for Document Management</a> <a href="#">NAVA Standards 2006-72 for Records Retention &amp; Management</a> <a href="#">NAVA Standards 2006-93 for Customer Consents</a>

**APPROVALS**

<u>APPROVING BODY</u>	<u>DATE APPROVED</u>
E-Delivery Task Force	October 13, 2006

Combined STP Working Groups	October 20, 2006
STP Executive Council	December 4, 2006