



**COMMONWEALTH OF MASSACHUSETTS**  
**Office of Consumer Affairs and Business Regulation**  
**DIVISION OF INSURANCE**

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**Life Insurance**  
**Filing Guidance Notice 2019-F**

**TO:** Carriers offering Life Insurance Policies in Massachusetts  
**FROM:** Sheri Cullen, Director, Policy Form Review  
**DATE:** July 10, 2019  
**RE:** 2017 CSO Mortality Table

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This Filing Guidance Notice is issued to provide guidance to those insurance carriers licensed under M.G.L. c. 175 who offer life insurance products in the Commonwealth of Massachusetts.

The Valuation Manual, as most recently adopted by the National Association of Insurance Commissioners, requires carriers to use the 2017 CSO mortality tables for policies offered on or after January 1, 2020. Chapter 367 of The Acts of 2018 allows carriers to start using the tables as of January 1, 2018. In order for carriers to ensure that the Division can receive and review filings for them to be in compliance, please submit all necessary filings through the System for Electronic Rate and Form Filings no later than November 1, 2019

When submitting filings, carriers should specify the Filing Type as “Other” and include the following information within the filing description section of the General Information Tab:

- The filing is being made for the sole purpose of updating a previously approved form to employ the 2017 CSO Mortality Table
- No changes have been made to the previously approved policy forms other than those reflected on the insert pages submitted within the filing
- Confirmation stating the approved insert pages will be used for new issues only

The Form Schedule tab should include:

- Replacement policy pages with a common form number that is distinct from the previously approved form number(s) and are to be used to change all instances of previous mortality tables to the 2017 CSO Mortality Tables. As an example, the filing should amend a policy’s basis of computation provision, table of guaranteed values (for fixed premium products only), data pages and cost of insurance (for interest sensitive and variable life products only).

The Supporting Documentation tab should include:

- The Certification of Compliance for each policy being updated
- Actuarial memorandum for each policy being updated. The memorandum should include certification that the product is in compliance with the provisions of M.G.L. Chapter 175, Sections 9 ½ and 144 ½.
- The Form Utilization List providing the product type, form number, Tracking Number and approval date of the product(s) being updated

The Filing Fee tab should include:

- \$75.00 per policy being updated.

If you have any questions regarding this Filing Guidance Notice, please contact Sheri Cullen, Director, Policy Form Review at (617) 521-7359.