

SERFF Product Steering Committee Meeting

Wednesday, January 18

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Meeting Recording Link: <https://naic.webex.com/naic/ldr.php?RCID=606421b414331e19d4492b8203932683>

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Roll Call

- Roll will only be called for current PSC members
- Interested parties who are calling in and wish their attendance to be recorded can email lbandle@naic.org

SERFF Modernization Progress Updates

Phase 1

- Pilot Page Released 12/5
 - Focus Group Testing - Complete
 - PSC Member Testing - In process
 - Industry Focus Group Testing - In process
- Compare Attachments Released 12/15
- Upcoming changes to Pilot Page
 - Filing Description
 - Primary Reviewer
 - Disposition Status

Phase 2

- Moving SERFF data to the Enterprise Data Platform (EDP)
 - Development continues
 - New data model for reporting nearing completion
- Tableau Dashboards
 - Development baselines complete for 4 of the dashboards
 - Implementing the Access Security - specific levels of access for Tableau and Data
 - Starting to link dashboards into EDP data
- Pilot Group Review coming soon!

Phase 3.1 - Interstate Compact

- Features:
 - 'Easy Submit'
 - 1st iteration of filing fee implementation
 - Supporting Documentation
- Hardening and planning activities
- Preparation for the next quarter

Industry Focus Group Survey

- **Link: [Focus Group Survey](#)**
- **Only for industry users**
 - **State users are being contacted separately for focus group participation**
- **Focus groups will be spun up gradually during the project**



SERFF Modernization Engagement Activity

- Used online tool - Menti
- About 85 PSC attendees participated
- Main topics covered: Compare Attachments, Preparing Schedule Items, Deleting Draft Filings, and Post Submission Update/Amendment
- Questions from the activity are on pages 10-13
- Results from the Menti Activity start on page 15
- **If you were not able to participate in the activity or would like to expand on your answers, feel free to email responses to the questions to Lauren (lbandle@naic.org) and Bridget (bkieras@naic.org)**

Engagement Activity Questions: Compare Attachments

When answering, please provide what type of user you are (state or industry) and how often you use SERFF (daily, weekly, etc).

Description:

- A new feature to compare attachments on a filing was released in December 2022.
- We would like your feedback on that new feature.

Questions:

- **Which of these describes your usage of the new Compare Attachments feature?**
 - I have used this feature
 - I haven't used this feature, but I'm aware of it and plan to use it in the future
 - I am aware of this feature, but I don't anticipate needing to use it.
 - I was not aware of this feature
- **If you have used this feature, what feedback would you like to share?**

Engagement Activity Questions: Preparing Schedule Items

Description:

- We would like to get some information on how the four schedules on a filing are prepared in SERFF. Form, Rate/Rule, Supporting Documentation, and Statement of Intent (compact filings)
- For each question, please answer as it applies to each of the four schedules on a single filing.

Questions:

- **How many people usually prepare the given schedule?** 1 person or multiple people
- **How long does it usually take to prepare the given schedule?** 1 day or multiple days
- **Does anyone check your work on the given schedule (an internal review)?** Usually yes or Usually no
- **Are there any data elements you would like added to any of the schedule items?**
- **Are there any data elements you would like removed from any of the schedule items?**

Engagement Activity Questions: Deleting Draft Filings

- **Why would a draft filing never get submitted?**
- **If there was an automatic clean-up process for draft filings, how long should a draft filing be kept in the system? Choose one.**
 - 1 month
 - 6 months
 - 1 year
 - Greater than a year
 - Draft filings should never be removed
- **Would a 'soft delete' function that moves deleted draft filings into a place where they can still be viewed for a certain amount of time be helpful? Yes or No**

Engagement Activity Questions:

Post Submission Update and Amendment Process

Description:

- Currently updating a filing after submission uses multiple different processes.
- We are looking at combining as much of this as possible into one cohesive process.
- Here are the proposed changes:
 - Data entry fields (ex. General Information) and Schedule item changes are all made in one amendment workflow.
 - When an amendment is submitted, the reviewer acknowledges each change (accept or decline). This acknowledgement is meant to indicate whether the change can be made, not necessarily whether the change is correct for the purposes of the filing review.
 - There will be options for regulators to set changes for automatic acknowledgement. (Ex. All product name changes are automatically accepted.)

Questions:

- **Why are Post Submission Updates disapproved?**
- **Is there any filing content that cannot be changed currently where changes should be allowed?**
- **Is there any filing content that can be changed currently where changes should not be allowed?**
- **What kind of filing changes need state acknowledgement?**
- **What kind of filing changes do not need state acknowledgement?**
- **What do you think about the new PSU/Amendment process?**

2023 Call Dates

- February 15
- March 15
- April 19
- May 17
- June 21
- July 19
- August 23
- September 20
- October 18
- November 15
- December 13

January SERFF PSC

Go to

www.menti.com

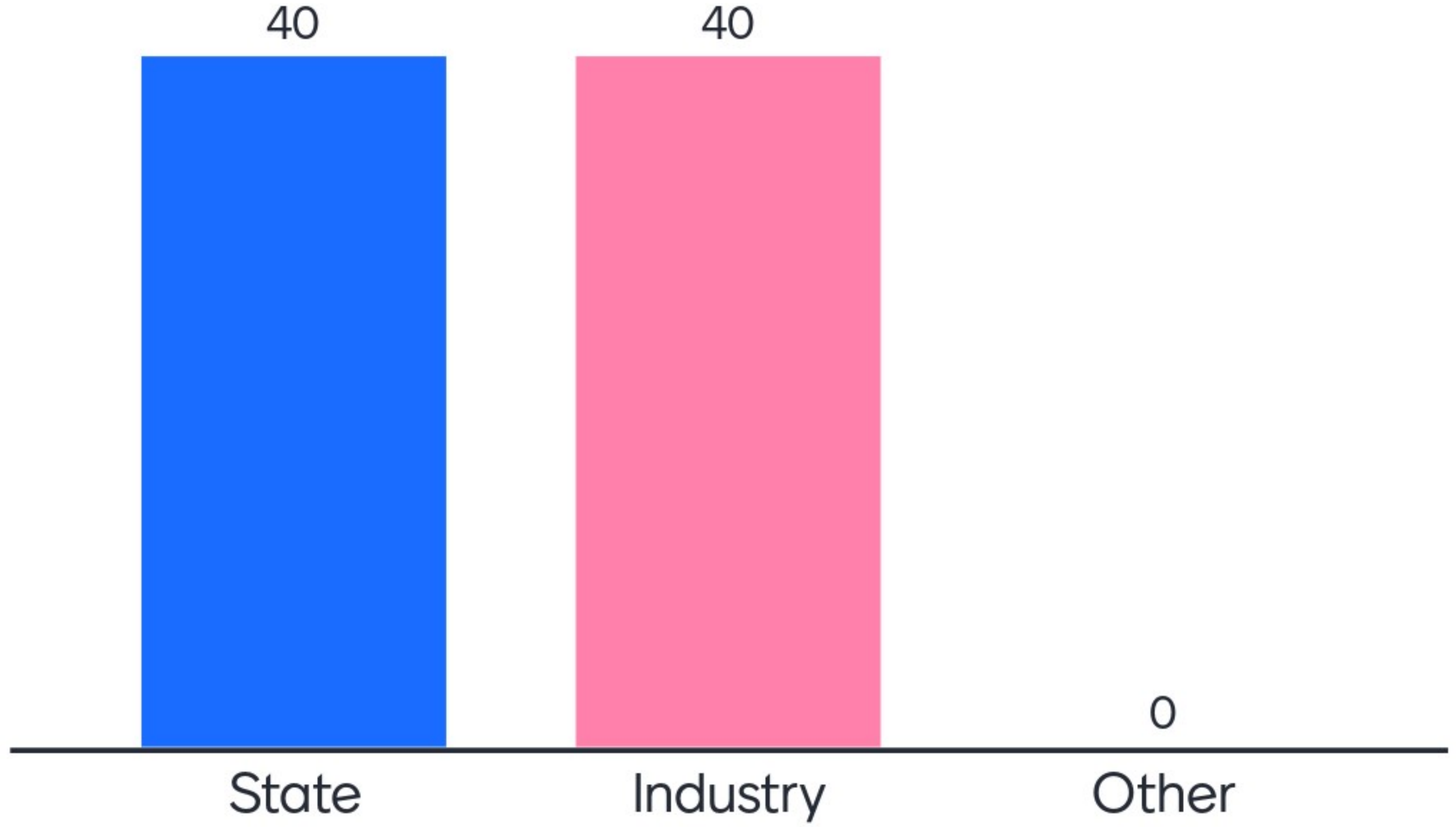
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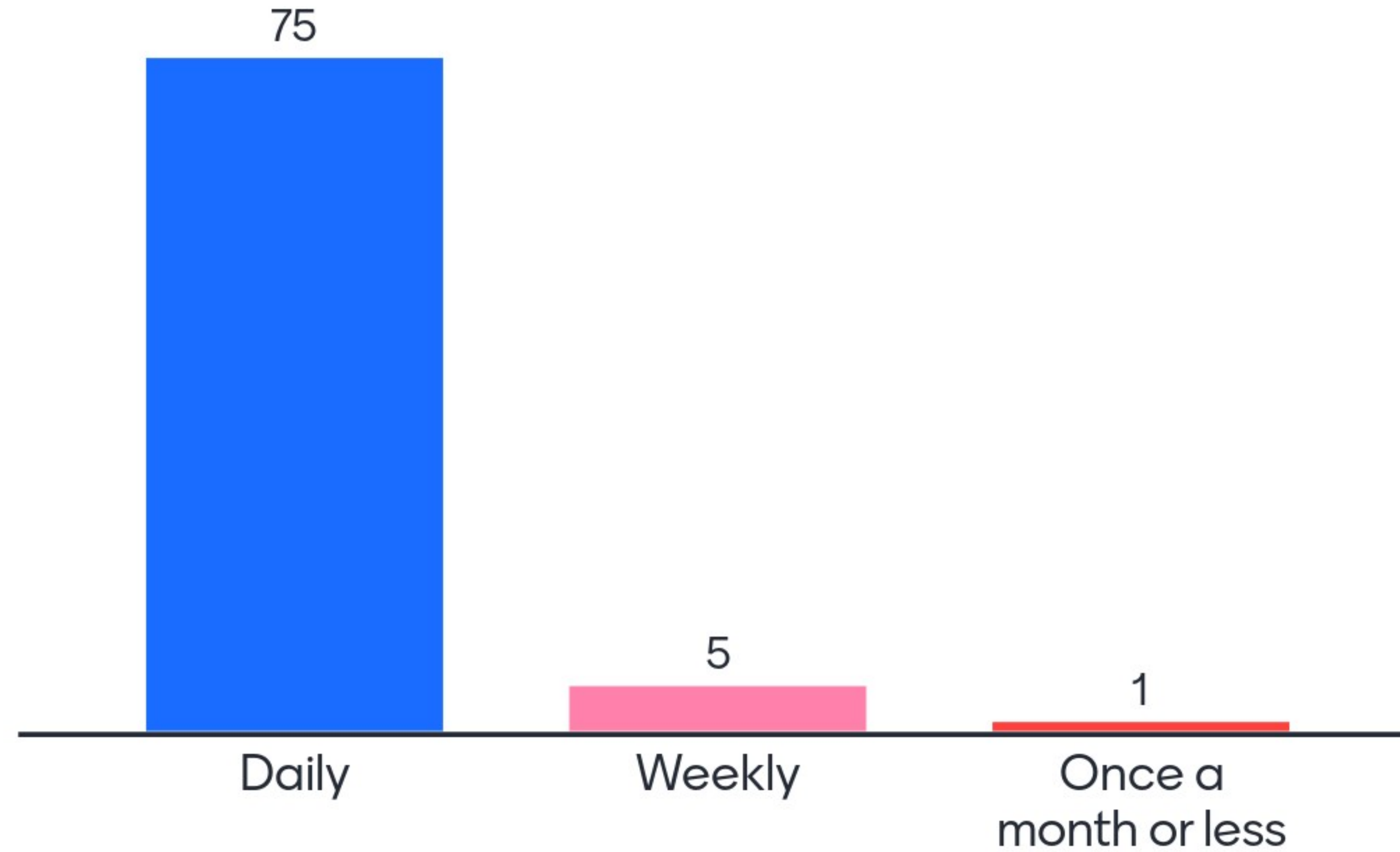
Or use QR code



What type of user are you?



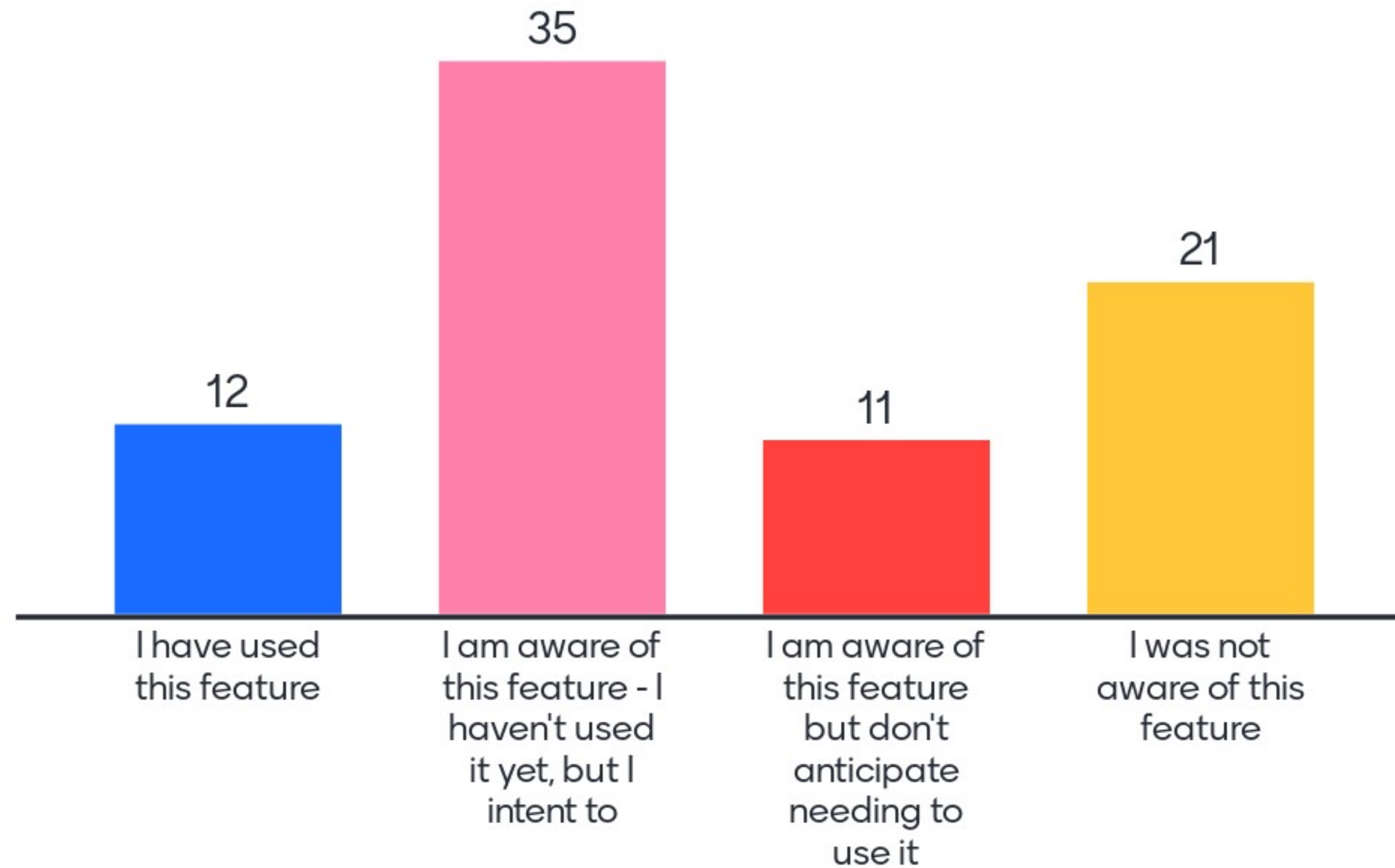
How often do you use SERFF?



Compare Attachments Feature



Which of these describes your usage of the new Compare Attachments feature recently released to production?



If you have used the feature, what feedback would you like to share?

N/A

N/A

N/A

n/a

n/a

N/A

Haven't used it.

N/A

N/A

If you have used the feature, what feedback would you like to share?

N/A

n/a

N/A

I have not used it.

n/a

N/A

N/A

I thought that it worked well.

Still new to using the feature and trying to figure out the best use in my workflow

If you have used the feature, what feedback would you like to share?

n/a

It is cumbersome and not as effective as other tools I use to compare files

We have not used the SERFF Comparison Tool feature, however, we have used a comparison tool via Adobe Acrobat.

It didn't serve our needs on the industry side of things. It appears more valuable for reviewers.

I have only tested it so far and it seems like it will be a very helpful tool.

The side by side looks much nicer than the adobe pro version, just extra steps to get old version into SERFF to compare.

It was helpful.

This has been very helpful! I would like to see the option to compare docs in associated and/or prior filings.

I looked at it once, it looked like you had to attach the new version and the old version to compare too. We don't file that way.

If you have used the feature, what feedback would you like to share?

Seems good. It's nice to have an alternative to PDF compare in Adobe or document compare in Word. None are perfect.

My intake staff used it and really liked it to compare corrected documents to verify all corrections had been made that were requested.

Really like. Looking forward to being able to compare across filing submissions.

I wonder if the states will allow use of that function instead of requiring redlining of resubmissions.

It worked well.

I really wish it would compare documents across filings.

It would be nice to compare documents from different filings.

I heard from others on my team that they would like more specificity in the marked changes.

Will states allow this over redlines?

If you have used the feature, what feedback would you like to share?

It was helpful to show the before/after versions comparison

N/A

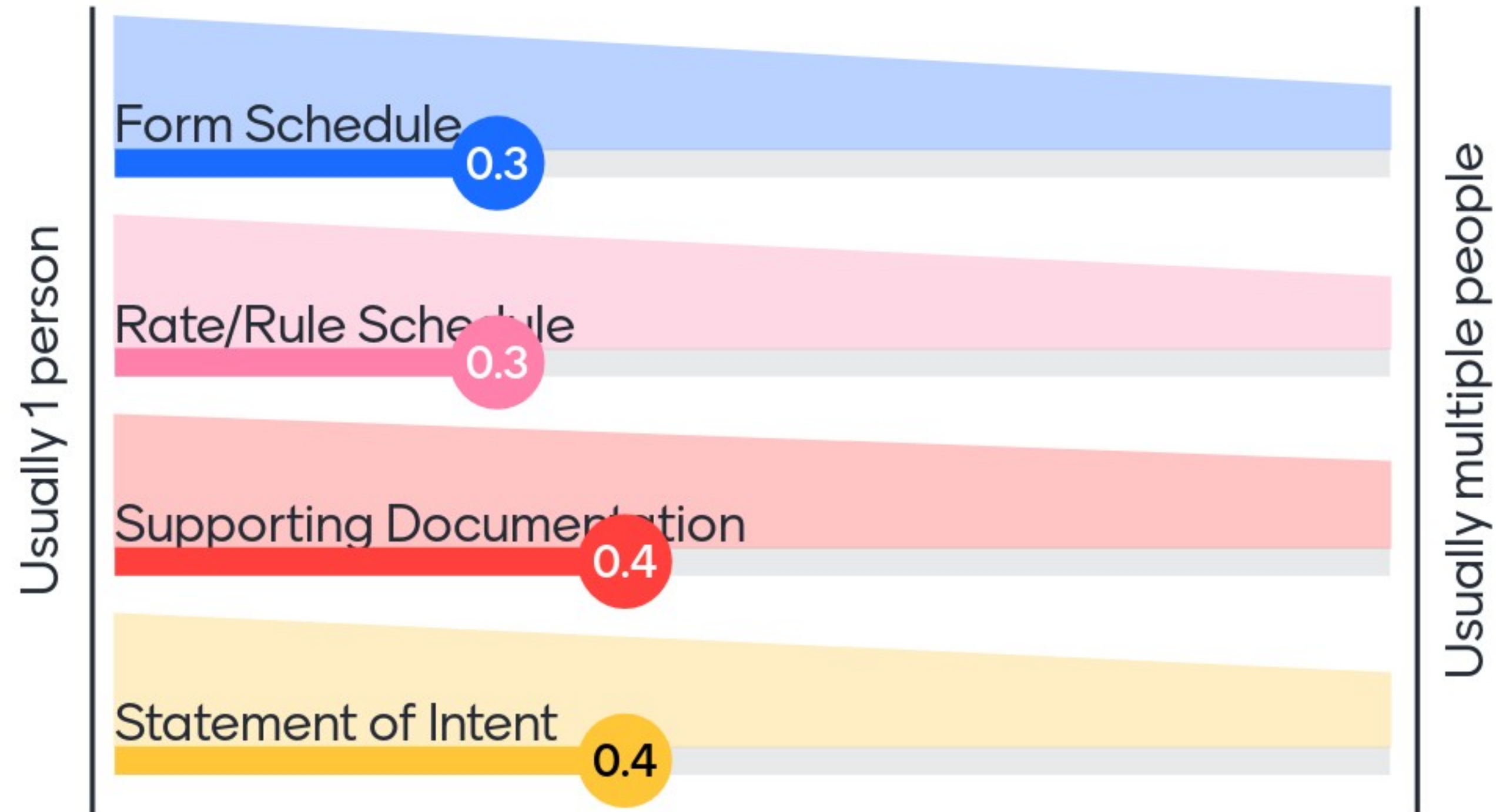
I person for that assigned state.

It depends on how many items we are including in a filing. Varies significantly

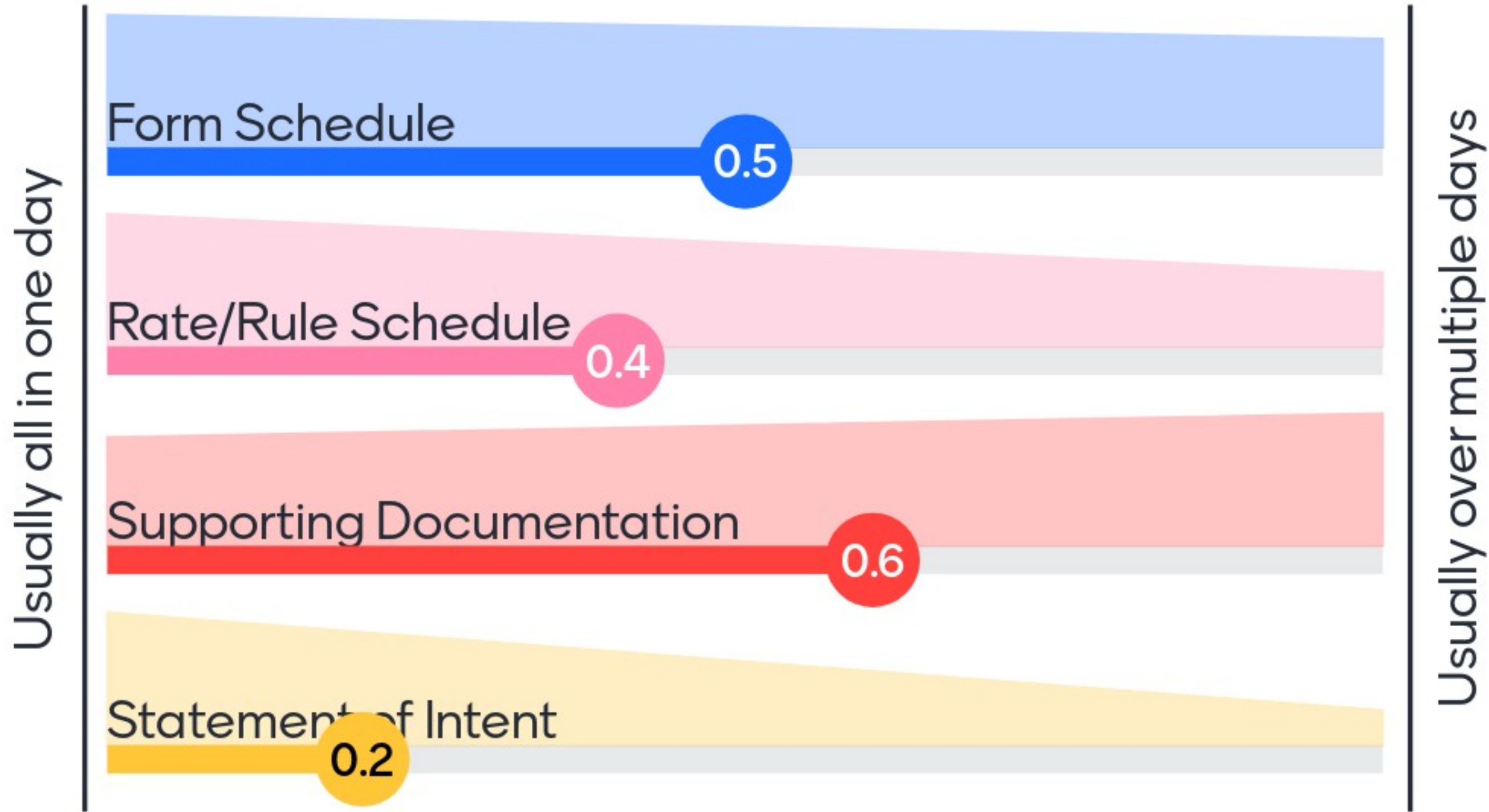
Preparing Schedule Items



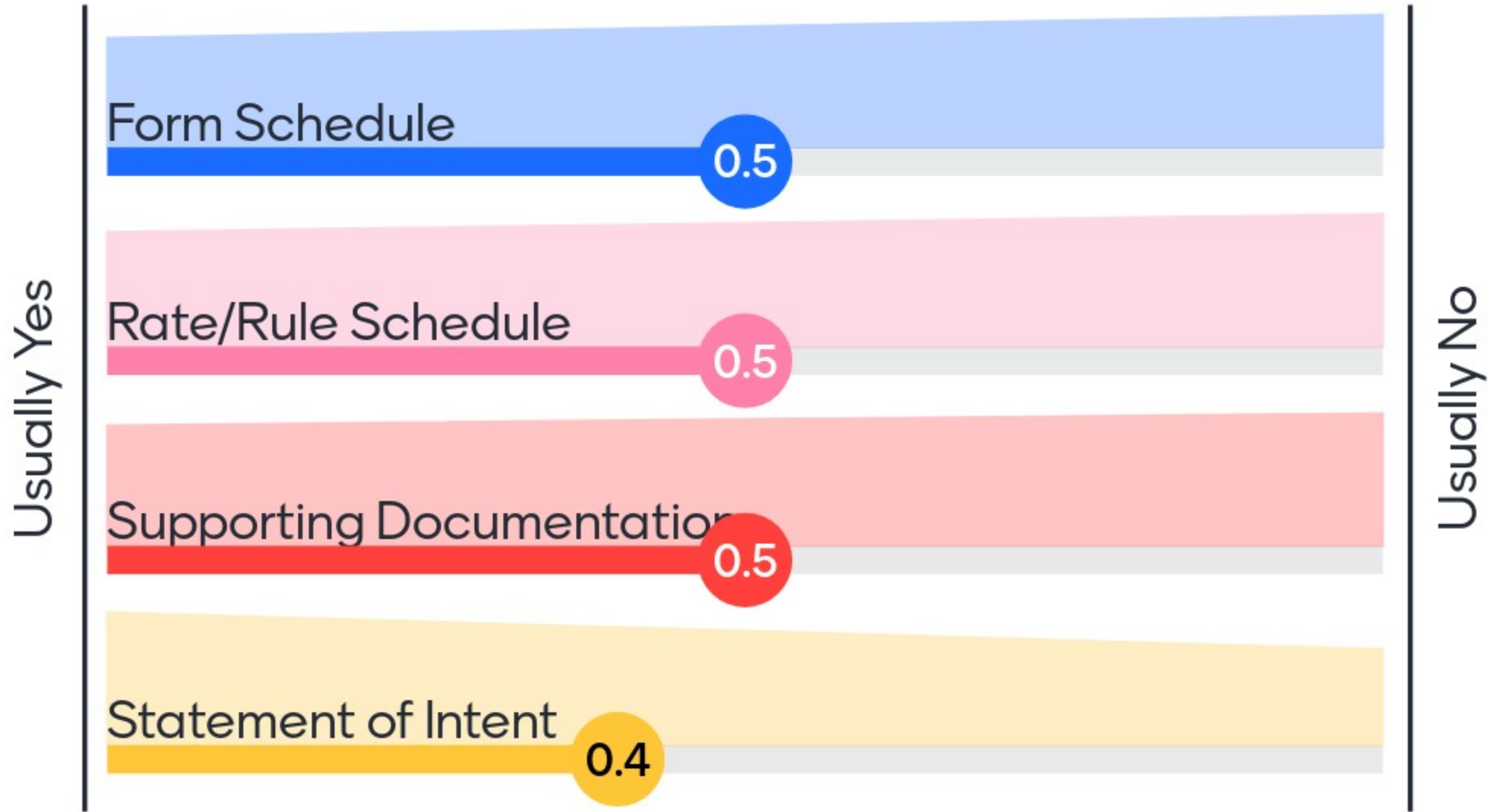
How many people prepare the given schedule?



How long does it take to prepare the given schedule?



Does anyone check your work on the given schedule?



Are there any data elements you would like added to any of the schedule items?

N/A

NA

n/a

No

N/A

No.

No

No

N/A

Are there any data elements you would like added to any of the schedule items?

No

N/A

Number of pages in each attachment

No

the ability to drag forms from one place to another on the Form Schedule tab.

Not that I can think of

Type of Form?

HIOS ID and SERFF IDs - Cross referenced for ACA filing season

Not that I can think of

Are there any data elements you would like added to any of the schedule items?

Yes. Could states add bullet points on the fee tab so we don't have to comb through all the verbiage on filing rules? There is one state that does this and it saves so much time and makes it so much clearer.

Maybe not considered a data element, but the ability to easily move items on the form schedule, like click and drag the order of the forms....

I cannot think of anything at this time

The state reviewers contact information and telephone number

State contact information (telephone & email)

No

Rate/Rule Manuals - It would be nice to have it's own tab where companies have to put their rate/rule manual pages. We require a full manual, marked pages and final pages.

User defined. For L&H: Initial request vs Approved amount.

N/A

Are there any data elements you would like added to any of the schedule items?

Drop and Drag ability

N/A

Reviewer phone number and email address.

The ability to drag/drop attachments from our desktop into their respective scheduled item (whether on the forms or rate/rule schedule tabs).

be nice to attach a form and it populate the data

Indicator that it is a complete rule manual or rate manual that has been attached, not just revisions

ability to hide the prior versions

In an ideal word, it would be nice if there was a way states could identify specific fields that need to be added based on the filing type/TOI - to capture some information we are currently tracking in spreadsheets outside of SERFF.

for the states that require mocks up to be added as form schedule to be able to identify that

Are there any data elements you would like added to any of the schedule items?

HIOS IDs for ACA major medical filings but maybe no on schedule pages; # o pages;

Access for industry, company contact name change and address change.

N/A

indicator as to applicable policy form (forms) that endorsement, application, etc is used with

No need for Flesch score on the forms schedule if a cert is going to be required anyway

I would like to see consistency with the use of the edition date field on the forms schedule

No

Yes. When submitting a specific TOI could the supporting documents requested match that TOI instead of asking for everything for each filing when some of the items are N/A?

Only ask for things that will be needed - it varies by state

Are there any data elements you would like added to any of the schedule items?

NA

Multiple companies in the Rate/Rule schedule tab totals on all.

The company changed its mind and decided not to file after first asking for something to be filed.

It was created for the team to clone for the project.

Created with incorrect information. TOI might be incorrect.

Are there any data elements you would like removed from any of the schedule items?

n/a

No.

I don't use "Schedule Item Status"

no

No

no

No

I would like to be able to vary the state questions tab by TOI.

NA

Are there any data elements you would like removed from any of the schedule items?

Can't think of any right now.

No

Nothing I can think of at this moment

Maximum % Chage, Minimum % Change..... I'm not sure how regulators utilize this and if it is helpful.

Can't think of any right now.

Not that I can think of.

No

n/a

n/a

Are there any data elements you would like removed from any of the schedule items?

General Information - Project Name & Project Number

Would love to have ability for industry to correct "errors/typos" in form name, number, etc without all the superseding that is required today to do so. Just correct, more like a PSU.

Deleting Draft Filings

Why would a draft filing never get submitted?

n/a

It was created for training purposes

NA

N/A

requestor decided to remove a state from a request

N/A

Incorrect companies selected.

N/A

N/A

Why would a draft filing never get submitted?

Created just to see what the Supp Doc requirements are.

exempt filing

Project has been put on hold or cancelled

If it is a drawer filing

I create samples to see what is needed as a test.

Decided not to file in that state

maybe after creating the line of business is actually exempt

Training

TOI not allowed in that state

Why would a draft filing never get submitted?

Maybe it is used for training purposes?

Sometimes I use it as an example.

Our business decision has changed.

Change of mind at the company

Business partner puts filing on hold

Training purposes

internal company change in strategy

I may start a filing and then the plans change.

Most likely they're forgotten

Why would a draft filing never get submitted?

accidentally created

Filing set up in error

User error

Wrong TOI or sub-TOI selected when the draft was setup.

Decided not to file.

TOI not allowed in particular state

CA only allows one product filing at a time so we create our drafts and wait until we can submit

We create a test draft just to see TOI/subTOI choices, then delete the draft.

I think we should always delete draft filings that are not submitted

Why would a draft filing never get submitted?

Change in TOI/ Sub TOI

We sometimes build them for research purposes, but we try to ensure they are all deleted if not used.

created accidentally

We create a draft filing as a 'test' filing in order to pull the filing requirements for a specific state/line. We need to be sure we're including the most recent Supporting Documentation components and corresponding attachments prior to submitting.

It was a deregulated filing created for central file purposes only or a filing that was created by someone to check for a particular state if a TOI code or filing type was available, etc.

It was either used for test, or the content changed. We usually delete the ones that were due to content changes

Training purposes

N/A

Sometimes create for training purposes. Or the product could be scrapped.

Why would a draft filing never get submitted?

Filing set up incorrectly or has changes that require a new filing be created.

We do not accept draft or sample filings. As a regulator we require all form filings submissions be in their final state.

One person might create a filing and then either leaves or is dismissed and another person taking over might not know they started those filings are is unable to access the filing because permissions were limited.

We used to use SERFF as a way to create and store Desk Filings. Those filings would have not been submitted. We have stopped this process, but believe there are several that still exist in the Draft Status.

Business decided not to pursue the filing. Draft created to access certain state requirements, and forget to delete.

Sometimes I may want to see if the rules or requirements have changed.

Change in filing type

On rare occasion, we may draft a filing only to be told that the project has been pulled. But this is rare. Usually our business team only submits requests for filings that are slotted for implementation.

May have selected the wrong TOIs, company chose to not move forward with the filing, or multiple people working on filings and did not use the draft created and created a new filing.

Why would a draft filing never get submitted?

picked the wrong company and just forgot to delete the draft

We have set up a group of filings for a large project and they may not all get submitted within one year.

Shouldn't the company delete?

decided not to file product; a "desk" filing that was drafted for internal record;

The Company changes its mind.

If it is a drawer filing

- Created for training purposes- Used to obtain specific forms, transmittals or requirements in advance to help complete Actuarial justification on potential rate changes.- Created an electronic filing and realized a desk filing was required.

It is determined that the filing is exempt from filing.

If there is staff turnover

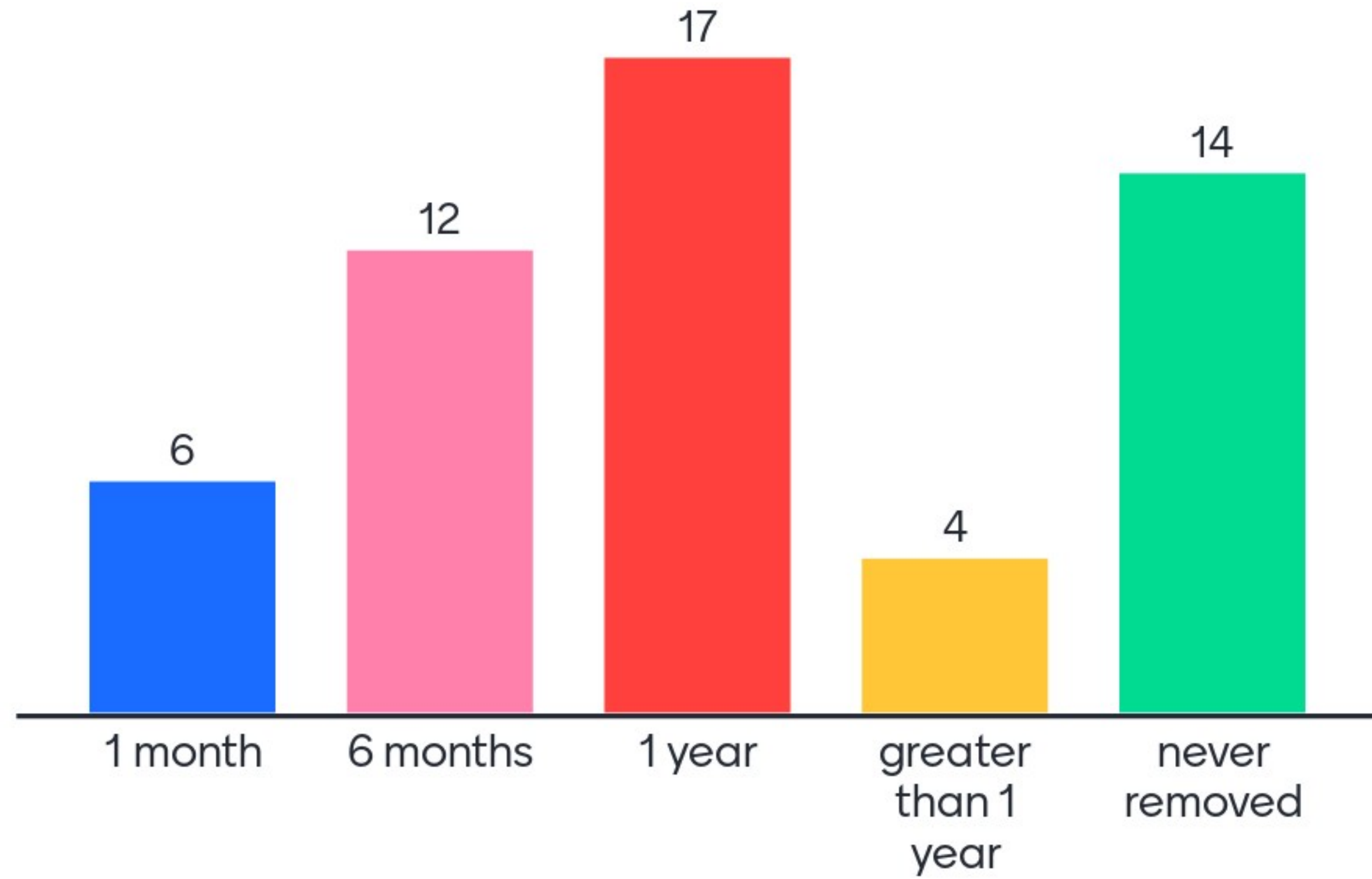
Why would a draft filing never get submitted?

1 Year

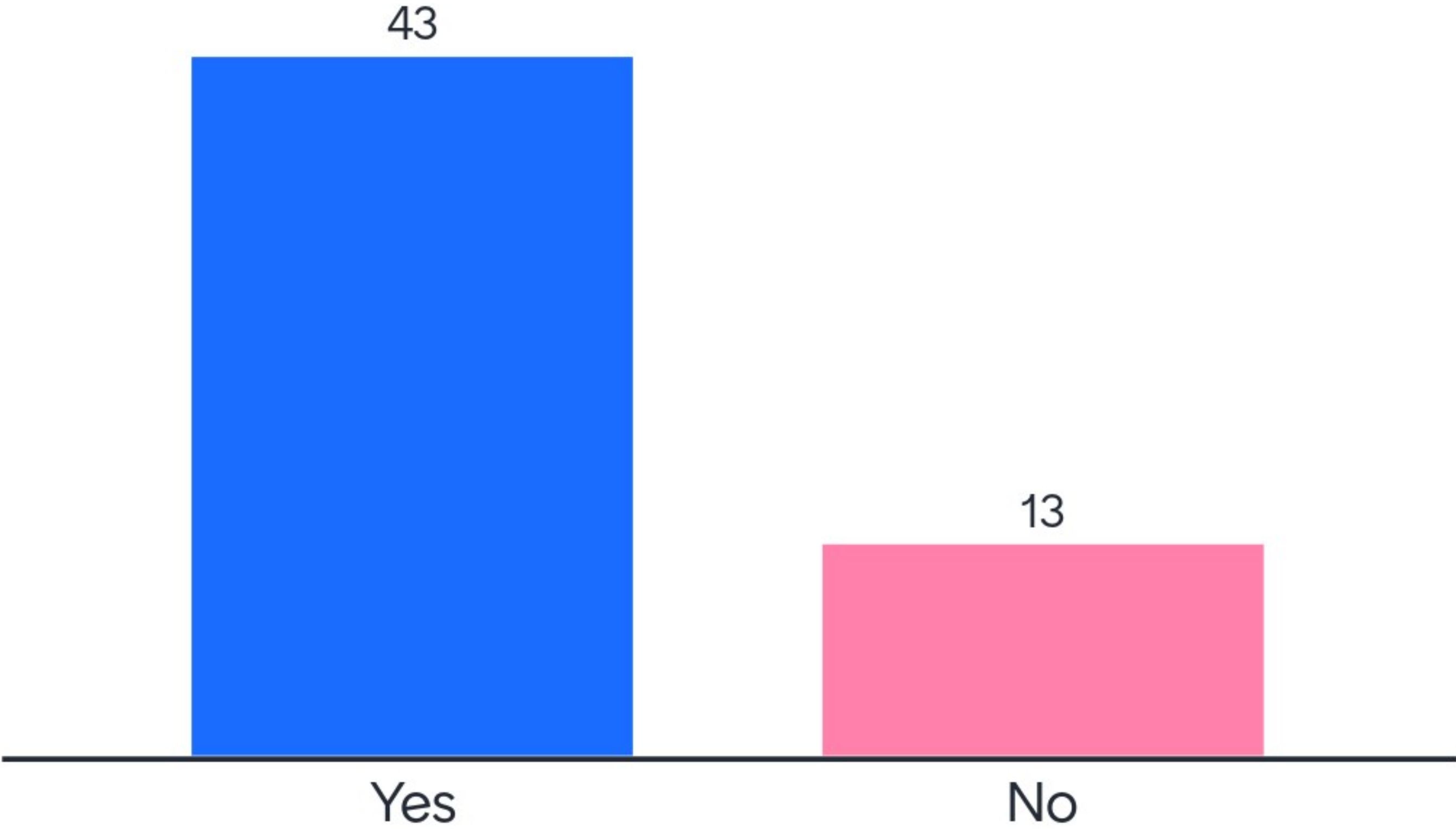
Because you have so many draft filings I think you should set up some sort of destruction time frame. To be safe, I would think 2 years would be sufficient.

Yes

How long should a draft filing be kept in the system?



Would a soft delete function be helpful



New PSU/Amendment Process



Why are Post Submission Updates disapproved?

User error

The effective date chosen is not acceptable.

Filing is being rejected.

Incorrect information given.

Revised effective dates in violation of law (greater than 60 days apart)

Errors

Effective dates aren't within the required time frame.

Never had one disapproved.

Wrong information provided.

Why are Post Submission Updates disapproved?

If the company is changing the effective date outside what our statute allows for

Reviewer didn't accept it timely and another PSU/change is needed

Incorrect information provided

Effective date not acceptable.

Incorrect info

Incorrect TOI/Sub-TOI as outlined our instructions page

Filing is being withdrawn.

Errors

incorrect information provided

Why are Post Submission Updates disapproved?

There are errors.

Correction is still incorrect

State not satisfied with change or wrong field changed.

Prior effective date. Oregon requires post effective date

Not enough support for the change

no changes to items submitted - user error

Reviewer may advise to close filing and resubmit as new filing.

A reviewer disagrees/disapproves what was updated.

Insufficient info in Rate/Rule schedule items

Why are Post Submission Updates disapproved?

Rate data is inconsistent with rest of filing.

Incorrect information

incorrect or incomplete info provided

NY Doesn't allow them

From an industry user: if the DOI disagrees with the change.
(revised effective date)

Incorrect information.

In my experience, they're rarely disapproved.

I have never disapproved one.

State reviewed the content of the PSU and found it unacceptable.

Why are Post Submission Updates disapproved?

Effective date may fall out of range. Revised impact info does not align with response

If we decide to allow ability to change TOI, perhaps the company is not authorized for that TOI.

If the request fundamentally changes the forms submitted, we may not approve.

The state does not permit use of Post Submission Update.

Effective Date change outside of what is allowed

never had PSU disapproved.

incorrect/inaccurate data submitted. example; change effective date but wrong date was entered

They have included Note to Reviewer information in the comment field.

Invalid eff date requested

Why are Post Submission Updates disapproved?

Wrong information submitted

The change being made is not what was agreed to.

Currently, Maryland does not allow it

Some states don't allow them.

Bridget Made Me Do It!

Rarely disapproved however not enough information?

Incorrect information.

Changes to effective date

They are rarely disapproved

Why are Post Submission Updates disapproved?

Too much time has passed since the filing was initially closed.

Very rare today for us to have to disapprove.

Consistency for all states to allow

The company is attempting to make a change that does not comply with statute (maybe an effective date that is not far enough out) or the company changes the effective date to predate the disposition date (we don't allow backdating generally).

Some times they are approved so the company can submit a correction.

The update they provided did not supply the information we requested in a Note to Filer.

Update submitted beyond the period of time allowed for post-submission updates are allowed.

These updates are almost never disapproved because they usually update the effective dates or provide requested forms or rules.

Requested change doesn't comply with statutes/regulations

Why are Post Submission Updates disapproved?

Objections not responded to so all the information necessary to make the determination has not been received

Information was not revised or removed in a Filing Description, as instructed. Response to objection sent via Post Submission Update. Effective Date incorrect.

Companies

Don't think disapproval happens often, but might in the case of incorrect change or an unallowable change. Mostly I think we get PSAs in response to our requests or in response to correspondence with company or an objection.

SOI in Compact filings.

Add/ Remove company

They changed information in the wrong field.

TOI/Sub TOI

Incorrect company name submitted to the state.

Why are Post Submission Updates disapproved?

Add/Remove Companies Filing Type

Writing companies removed or added.

Company add or change including correcting/adding CoCode; contact information would be very helpful because that changes sometimes; filing type definitely.

No

n/a

Is there any filing content today that cannot be changed, where changes should be allowed?

Add/Remove company

company ?

TOI/Sub-TOI

Maybe list of filing companies...maybe

TOI and SubTOI

TOI or sub TOI

Contact: Group Code/Group Name

To my knowledge, the filer cannot change the Filing Type post submission and this option would be nice to have

Filing Type

Is there any filing content today that cannot be changed, where changes should be allowed?

TOI?

contact name

TOI/sub-TOI

filing type

TOI/Sub TOI

Can't think of any at the moment.

TOI/sub-TOI

TOI, Sub-TOI, filing type

Filing Type

Is there any filing content today that cannot be changed, where changes should be allowed?

Filing Company

To my knowledge, there is no such content.

company

Yes, filing type as well

company contacts

Filing TypeContact name

Filing type, toi

filing contact

Filing Type

Is there any filing content today that cannot be changed, where changes should be allowed?

Company name and NAIC number or group Number

Filing Type

company contact name

Filing Type

Filing type (rate/rule/form or combination of such)

NAIC Number

Removal of insurers from group filing; only choice to void or w/d

The order of forms. We would prefer the order be in form number order, sometimes they are not.

Filing Type!!!! Companies sometimes submit something as only a Rule filing when it should have been rate too and we have to reject and have them resubmit.

Is there any filing content today that cannot be changed, where changes should be allowed?

Filing type and TOIs.

TOI/Sub-TOI or filing type

SOI in Compact filings. Cannot delete items from SOI.

Filing Type

Filing fees

Complete removal of a document instead of just superseding it because superseding still leaves it in the filing.

Filing Type

It depends if the product has already been issued.

Filing type!!!!

Is there any filing content today that cannot be changed, where changes should be allowed?

TOI/Sub TOI, filing type, NAIC group & Co Code

Filing Type

Allowing issuers to resubmit form corrections apart from a response to "Pending Industry Response".

Filing Type Companies can't add or delete

why is there a contact name and a SERFF author section - should just be one. However the other day we wanted to change contact name but couldn't bc the state objecting only looked at that vs the author

Filing Type

Filing Company, TOI/Sub TOI, edit/delete option for objection response (in case something was submitted in error).

I think if the company is changed it would mess up our back office system. Unless they run an update to double check what the system is showing

Company, TOI/Sub-TOI, Filing Type

Is there any filing content today that cannot be changed, where changes should be allowed?

TOI/ sub TOI

TOI's, content, companies

All states should support 'PSU's but don't. Outside of the TOI; Sub-TOI; Filing Type (which I think is in scope), I believe all other changes are supported.

Contact info

Company information: wrong company name, wrong CoCode or State ID number, etc.

Company Contact info

TOI, Company Contact Info (NAIC/CoCode), Filing Type.

Filing type, such as form, rate, rule or combinations. If submitted as form/rule, and state believes it should be form/rate/rule, currently it cannot be changed.

company contact

Is there any filing content today that cannot be changed, where changes should be allowed?

Filing type...sometimes a form filing is actually form, rate & rule or becomes that following objections

Filing type

Filing Fee

No

No

I dont think so

No, in my opinion the more flexibility the better

The ability to complete a filing and include multiple TOI's/sub-TOI's

Restrictions on Rate Filing Changes or only allow Rate Filing Changes with PSUs is recommended.

Is there any filing content today that cannot be changed, where changes should be allowed?

No

"Bug" in confidentiality feature that allows industry to request confidential status on state's obj letter.

Industry needs ability to retract request for confidentiality

Is there any filing content today that can be changed, where changes should not be allowed?

No

None

No

No.

No

No

None at this time

No, if there were such a change, the state can disallow it.

Not that I know of.

Is there any filing content today that can be changed, where changes should not be allowed?

No

None that I can think of.

I cannot think of anything at the moment

Can't think of anything as long as state has ability to approve/disapprove.

nope

I can't think of anything

No

I can't think of any right now.. I think filing should be amended post submissions prior to starting our initial review

I think all changes should be allowed, but when a rate request is changed, there should be a note that shows what the initial request was.

Is there any filing content today that can be changed, where changes should not be allowed?

N/A

Effective Date changes

All changes

I think all changes need to be submitted and either accepted or rejected

depends on the product, but all changes should be allowed

All changes

public access

Depends on state statute.

Contact information

Is there any filing content today that can be changed, where changes should not be allowed?

Not quite sure. Need to see possibilities.

What kind of filing changes need state acknowledgement?

I say all changes. As a regulator, I want to know all changes that a filer is making.

Effective date change

TOI/Sub-TOI and Company name and NAIC number

effective date

effective date

All changes

All changes.

All changes.

indicated/selected rate changes

What kind of filing changes need state acknowledgement?

Change in TOI/Sub-TOI, Filing Type, Effective Date

All changes

All changes

All changes

Any, except effective date

All changes

All changes

effective date

Effective Dates

What kind of filing changes need state acknowledgement?

Effective date, filing description language

All changes

All changes

All changes.

We prefer to be notified of any changes and the change can only be made with our approval.

all changes

All changes

All changes

Industry user and agree that the regulator should acknowledge any change to a filing.

What kind of filing changes need state acknowledgement?

All current Post Submission Update items, plus TOI/sub-TOI and Filing Type.

Statement of intent, form/rate schedule items, TOI (if those become editable).

Amendment to any rate details or filing content (forms/ rate-rules) or the overall intent of the filing.

Filing type and TOI (if allowed by the state)

All changes

TOI/sub TOI and filing type

any changes after final disposition

Changes that include updating the proposed forms, rates or rules would require acknowledgment by the state.

Changes to TOI/Sub-TOI, Filing Type, Effective Date Requested, Filing Description

What kind of filing changes need state acknowledgement?

I'm guessing this response should be from the state side...

Anything that changes a filing content after initial review.

If state is notified of the change, then no changes need acknowledgement.

All changes should be reviewed. If a filing has already been approved, the filing should be reopened first, before a change can be submitted and reviewed.

All changes should be accepted or denied

Would need time to consider more, but in general, state should be able to disallow any change. Can't think right now of any change where notification only without ability to disallow would be acceptable.

All I would think unless the state feels it isn't necessary

Any change that is crucial to the filing. For example, the effective date. Could be too early so needs to be approved and/or reviewed. The TOI needs to be reviewed because the company may not have the correct licensing for that line of business.

Substantive changes, including those requested by the regulator or changes made voluntarily by the issuer.

What kind of filing changes need state acknowledgement?

Eff Dates Changes require public access changes & have statutory issues, so those would definitely require acknowledgement

na

What kind of filing changes do not need state acknowledgement?

Amendments, requested effective dates

Company changes and contact information

None

Nonr

None

None

Can't think of any

All changes should be acknowledged.

None

What kind of filing changes do not need state acknowledgement?

Effective dates if the company intends to implement on or after the Filed For Use date

Effective date (in most states).

None

Amendments to the original filing as long as it has not been reviewed

Company contact info

None that i can think of

Effective Date Changes

None

None

What kind of filing changes do not need state acknowledgement?

Can't think of any

none

none

Change of effective date if the filing is approved as long as the effective date is a date in the future or after the date of disposition.

forms, rules, rate pages - we do not accept the change, just continue review

Effective dates

Company contact or addition of an author on a filing.

N/a

Supporting document updates, changes to the filing description, company contact info.

What kind of filing changes do not need state acknowledgement?

Change in company

Company contact information

Non-substantive changes, changes that would not change the meaning of a filing provision. No changes for closed filings, issuers should resubmit a new filings.

If filing is still in Submitted to State status and no Note to Filer exists.

For open filings, anything an amendment can change currently. For closed filings, all changes need state acknowledgment

Product Name, Project Name, Project Number, Domicile Status, Author, Market Type

Since we allow PSUs on closed filing, I would likely want to review changes on these closed filing, with exception of fixing typos in form name or number if that became a PSU thing instead of an amendment

none

Need to think more about this.

What kind of filing changes do not need state acknowledgement?

Perhaps contact information, but think all other changes would need to be allow/disallow. PSAs after a filing is closed should always require state approval.

What do you think about the new PSU/Amendment process?

Not sure without seeing an example.

I don't mind the current process but am open to something new.

Some items may be missed or accepted in error.

I think it makes sense to have one type of amendment process that is allowed by all states

I like that they would be combined into one area.

Any simplification of a process, or making it more user friendly is welcome

It seems to streamline the process. Not having to submit an Amendment and a PSU would be more efficient.

Would like to test to see if it makes sense.

I like the concept of only having 1 process to make changes

What do you think about the new PSU/Amendment process?

So far so good

Would need to work with it a bit more to have useful feedback.

Would be great if all states allowed it

Amendments seem to shoot up error rates so allowing changes outside of that step makes sense

I don't follow what you mean by "new process."

Would like to see more examples

It would be great to streamline the process between states.

I think this will help when there is a Post Submission Update needed as well as a change to a schedule item. Right now it is a two step process and this would cut it down to one. Helpful for us at Intake level.

Sounds good being able to include what is now a PSU and Amendment together instead of submitting both the PSU and Amendment.

What do you think about the new PSU/Amendment process?

I am okay with the current process, but understand the need for efficiency.

Not sure. Would like to see examples.

Anything that makes it easier for reviewers to approve our filings more promptly is a positive change. If it makes review process longer, or will invite more objections, then skip it

I think I like what is proposed.

seems like it would be easier if we use the same process for both

I'm looking forward to see what you come up with.

not sure without seeing how this would work

I think it will make it a lot easier to train, to submit quicker, and to have less buttons to press

It is a case by case basis.. Will need to see the new amendments

What do you think about the new PSU/Amendment process?

I would like for the filer to state what it is they changed. Right now, I get the message and then I have to figure out what is different in either the filing description, or whatever... what is being changed.

I think that it should be one process for changes. Having to explain to others which type to use can get frustrating.

An example would be great

Anything that streamlines the processes into one process is good. It would also be nice if we didn't have to attach a changed schedule item to a response.

the flexibility sounds good as long as the state has the ability to manage what changes are permitted overall (thinking filing type, TOI). would need to think about the impact on the our backoffice system

Sounds like it has a lot of potential especially for changing things that can't be updated now like TOI/Sub-TOI etc. and making changes more transparent and easier.

Would like to see an example.

I do like the idea of not having to do an Amendment and a Post Sub update, if that can be combined would be great.

I like having the ability to have it within one transaction. Right now when a response requires a PSU, it involves 2 steps and sometimes the PSU does not get submitted.

What do you think about the new PSU/Amendment process?

I like the idea of a streamlined process.

Like the idea

Streamlining any (or all) processes would be greatly appreciated

agree with answer about better to pinpoint changes than get a blanket letter seeing schedule items have changed

Things to consider for closed filings. Consider adding a timeframe limit, maybe 5 days after closing for PSU/Amendments.

As you mentioned, break this up into Pre and Post disposition processes. You might then also include withdrawals in this process.

Would love the ability for industry to fix some of those "typo"-ish issues that will improve our ability to search & research. When something is spelled wrong or doesn't identify exactly what the filing is, it just extends the work/review

Life the idea of streamlining the process.

Consolidating into one process seems like a good idea, but I am a visual person so I'd like to see it.

What do you think about the new PSU/Amendment process?

I like the way it is. Just certain information can be changed in this area.

I think it is great, especially for post submission update requests. Another PSU cannot be submitted until the pending PSU is closed.

Will allow for "corrections" without as much work/time & messiness

What would happen if what they normally would have changed in a Post Submission Update is incorrect but the Amendment of a schedule item was correct; is there a way to decline one piece?

The state should have the ability to control what can be changed with and without approval.

Like idea of one centralized place for processing changes.

Always love improvements to current processes (provided they make sense and are helpful for both the user and the reviewer).