

From: [Sharon Miyashita](#)
To: [OIC Rules Coordinator](#)
Subject: Comment re Notice on rulemaking on (R 2023-08) Life Insurance disclosure agreements
Date: Friday, October 6, 2023 1:30:58 PM

External Email

We are currently using a Terminal Illness Accelerated Death Benefit Rider that was approved by the Insurance Compact on September 21, 2021 – one attachable to term policies, the other to whole life policies.

Our riders clearly state in the first paragraph under the title, *“It does not provide health, nursing home, or long-term care insurance.”* Your proposed Disclosure statement WAC 284-23-650, (2)(b) states, *“The disclosure statement must begin with the following statement: ‘This accelerated life benefit does not and is not intended to qualify as long-term care under Washington state law. Washington state law prevents this accelerated life benefit from being marketed or sold as long-term care.’”*

We would like clarification as to whether we will need to submit revised Terminal Illness Accelerated Death Benefit Riders or an Endorsement for use in Washington state only or is the language in our Compact-approved Riders sufficient to satisfy the proposed disclosure statement.

Look forward to what is decided.

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