

Market Analysis Research and Development (MARD) Focus Group
Complaint Coding Implementation Plan
Complaint Handling and Reporting Standards Project

Timeline

2009

- **January - June**

Business Fiscal Impact Statement (BFIS) preparation

- **March**

States' commitment to implement the newly adopted complaints specifications in each state's complaints system by a certain date

States approval of NAIC staff expending resources to estimate the effort to change the NAIC's Complaints Database System (CDS)

- **July and August**

BFIS development, including but not limited to the following:

For NAIC – Impact to existing personnel or systems; projected costs; business risks, assumptions, and constraints

For States – Timeline for mapping to new specifications; timeline for changes to states' complaints systems to comply with new specifications

- **August - December**

BFIS approval by D Committee, Technical Consulting (H) Working Group, Information Resources Management (H) Committee, and Internal Administration (EX1) Subcommittee

2010

- **January**

Complaint Handling project starts at NAIC

Market Analysis Research and Development (MARD) Focus Group
Complaint Coding Implementation Plan
Complaint Handling and Reporting Standards Project

Assumptions

The Focus Group made the following assumptions when developing the Implementation Plan:

1. In December 2008, NAIC membership will discuss getting states to commit to implement the newly adopted complaints specifications in each state's complaints system, and that states approve of NAIC staff expending resources to estimate the effort to change the NAIC's Complaints Database System (CDS).
2. NAIC staff will estimate the cost of implementing Option 1, of the three implementation options that were reviewed, and prepare a Business Fiscal Impact Statement (BFIS) for the project to start in January 2010.

Option 1 – Old to New Converter Program

On the first day of implementation (Day 1), the NAIC will display data according to the new complaint specifications. On Day 1, the NAIC will be able to capture data from states whether the data is submitted using the new or old specifications. (Prior to Day 1, the NAIC will accept data using old specifications only.) If states submit data using the old specifications, the NAIC will change that data to conform to the new specifications. If states submit data using the new specifications, the NAIC will capture and store that data as it is submitted.

All historical complaints data residing in the NAIC's State Producer Licensing Database (SPLD) will be converted to the new specifications by Day 1. All reports, such as those in I-SITE, and systems, such as the Consumer Information Source Web site, which the NAIC maintains, will be converted to show data using the new specifications by Day 1.

Over a designated period of time, NAIC will work with states to test their systems once they have implemented the new specifications. A sunset date will be established when all states must be converted to submit only new specifications.

Primary advantages:

- Data is captured and displayed using new complaint specifications as soon as the NAIC can implement the changes to systems and historical data.
- Users of complaints data will be able to analyze data using the new specifications and will not have to wait for all states to convert.

Primary disadvantages:

- Users of the data have to be knowledgeable of the changes to the complaint specifications on Day 1.
 - There may be minimal incentive for states to convert to the new specifications.
3. States will determine when this project will be implemented in their states and the impact on their resources. States will test with the NAIC when they have converted to the new specifications. States will agree to and adhere to a testing schedule.
 4. A group of regulators will be appointed as soon as possible to assist NAIC Information Technology staff, to address open issues, and to make recommendations regarding implementation of this project, including pinpointing a 'sunset' date for the implementation of the new complaints specifications by all states.