

**Compliance
Bulletin**

Communication

Upline Licensing, Appointment, Solicitation, and Commission Sharing Updates

We recently completed a review of Upline licensing, appointment, solicitation, and commission sharing regulations.

In summary, eighteen (18) states require that Uplines in a writing agent's hierarchy must be insurance licensed to receive commission. Three (3) states also require Uplines to be state appointed by the insurance company paying the commission.

The table below outlines the states.

Uplines must be licensed to receive commissions	Florida*, Georgia, Illinois, Kentucky, Louisiana, Massachusetts, Mississippi, Montana, New Mexico, New York, North Carolina*, Pennsylvania, South Carolina, South Dakota, Texas, Virginia*, West Virginia, Wisconsin
--	--

*Insurance license and state appointment required to receive commission.

Changes from the current Upline requirements are summarized as:

- All Uplines receiving a commission in Kentucky, Mississippi, South Carolina, and Texas must hold an insurance license.
- All Uplines in Florida, North Carolina, and Virginia must also be appointed by the issuing insurance company.
- Uplines in Alabama and Connecticut are no longer required to hold an insurance license to receive an override commission payment.

Research has been conducted on the added states and we have confirmed that state licensing can occur within 3-5 business days of a completed requirement application.

Please plan to start complying with the state requirements immediately. After July 1, 2021, Global Atlantic will deem contracting and/or new business not in good order and will require the appropriate license to proceed. Non-compliance may result in held commission.

Questions? Contact your upline, or call the Global Atlantic sales team at **877-462-8992** or via email at **contracting@gafg.com**

globalatlantic.com

Products issued by and all policy benefits are the responsibility of Accordia Life and Annuity Company, 215 10th Street, Des Moines, Iowa 50309. Accordia Life is a subsidiary of Global Atlantic Financial Group Limited.

Global Atlantic Financial Group (Global Atlantic) is the marketing name for The Global Atlantic Financial Group LLC and its subsidiaries, including Accordia Life and Annuity Company, Commonwealth Annuity and Life Insurance Company, Forethought Life Insurance Company and Global Atlantic Re Limited. Each subsidiary is responsible for its own financial and contractual obligations. These subsidiaries are not authorized to do business in New York.