Annuity Suitability or Annuity Best Interest Training: Where and When

In 2010, the National Association of Insurance Commissioners (NAIC) amended the *Suitability in Annuity Transactions Model Regulation* (Model 275) by adding producer training and education requirements that must be satisfied **PRIOR** to the solicitation of an individual annuity product. In 2020, the NAIC amended the existing Model 275 to include **Best Interest** obligations. The 2020 amendments retain the existing producer product-specific training requirement, while adjusting the state required annuity training ("generic annuity suitability") to now include best interest.

SUITABILITY - In states that adopted the 2010 amendments to the suitability model, producers **PRIOR** to the solicitation of an individual annuity **MUST** complete both:

- 1. Insurer provided product-specific training, which explains material features of an insurer's annuity product(s); and
- 2. An approved one-time four (4) credit-hour "generic annuity suitability" training/certification course provided through a Continuing Education (CE) provider.

BEST INTEREST - In states that adopted the 2020 **Best Interest** revisions to the existing suitability model, producers **PRIOR** to the solicitation of an individual annuity **MUST** complete both:

- 1. Insurer provided product-specific training, which explains material features of an insurer's annuity product(s); and
- 2. Best Interest state mandated training provided through a Continuing Education (CE) provider. Best Interest training requirement can be completed one of two ways:
 - a. An approved newly created four (4) credit-hour state best interest training/certification course ("state best interest"); **OR**
 - b. If you have already completed the previous existing one-time, four (4) credit-hour "generic annuity suitability", now take an additional one-time, one (1) credit-hour catch up best interest training/certification course, as applicable by individual state.

State guide to training requirements

				If applicable, only one BEST INTEREST training option needed:			
State	State follows Suitability, Best Interest, or N/A	effective Date of Suitability or Best Interest Regulation (if applicable)	Product- Specific Training	Generic Annuity Suitability 4-hour Training (Required or previously completed)	Catch-up Best Interest 1-hour Training (Prerequisite: Generic annuity suitability 4- hour training)	State Best Interest 4-hour Training (If generic annuity suitability 4-hour training has not been completed)	
Alabama	Best Interest	1/1/2022	Required	Completed	7/1/2022	1/1/2022	
Alaska	Suitability	10/16/2011	Required	Required	N/A	N/A	
Arizona	Best Interest	12/31/2020	Required	Completed	6/30/2021	12/31/2020	
Arkansas	Best Interest	7/8/2021	Required	Completed	1/1/2022	1/1/2022	
California	Suitability	1/1/2012	Required	Existing training requirement: Both resident and non-resident to complete 8-hour initial annuity training course and 4-hour annuity CE every 2 years.			
Colorado	Suitability	4/1/2011	Required	Required	N/A	N/A	
Connecticut	Best Interest	3/1/2022	Required	Completed	9/1/2022	3/1/2022	
Delaware	Best Interest	8/1/2021	Required	Completed	2/1/2022	8/1/2021	
District of Columbia (DC)	Suitability	6/24/2011	Required	Required	N/A	N/A	
Florida	Suitability	10/1/2013	Required	Existing CE training requirement: 5-hour CE that includes suitability (CE to be completed every 2 years)			
Georgia	Suitability	3/1/2016	Required	Required	N/A	N/A	
Hawaii	Suitability	1/1/2012	Required	Required	N/A	N/A	
Idaho	Best Interest	7/1/2021	Required	Completed	1/1/2022	7/1/2021	
Illinois	Suitability	9/26/2011	Required	Required	N/A	N/A	
Indiana	Suitability	7/1/2011	Required	Required	N/A	N/A	
lowa	Best Interest	1/1/2021	Required	Completed	6/30/2021	1/1/2021	
Kansas	Suitability	6/1/2013	Required	Required	N/A	N/A	
Kentucky	Best Interest	1/1/2022	Required	Completed	7/1/2022	1/1/2022	
Louisiana	Suitability	8/1/2012	Required	Required	N/A	N/A	
Maine	Best Interest	1/1/2022	Required	Completed	7/1/2022	1/1/2022	
Maryland	Best Interest	10/8/2022	Required	Completed	4/8/2023	10/8/2022	

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State	State follows Suitability, Best Interest, or N/A	Effective Date of Suitability or Best Interest Regulation (if applicable)	Product- Specific Training	Generic Annuity Suitability 4-hour Training (Required or previously completed)	Catch-up Best Interest 1-hour OR Training (Prerequisite: Generic annuity suitability 4- hour training)	State Best Interest 4-hour Training (If generic annuity suitability 4-hour training has not been completed)
Massachusetts	Suitability	10/1/2016	Required	Required	N/A	N/A
Michigan	Best Interest	12/29/2020	Required	Completed	12/29/2021	6/29/2021
Minnesota	Suitability	6/1/2013	Required	Required	N/A	N/A
Mississippi	Best Interest	1/1/2022	Required	Completed	7/1/2022	1/1/2022
Missouri	Suitability	3/30/2017	Required	Required	N/A	N/A
Montana	Best Interest	10/1/2021	Required	Completed	4/1/2022	10/1/2021
Nebraska	Best Interest	4/7/2021	Required	Completed	12/31/2021	7/1/2021
Nevada	N/A	N/A	N/A	N/A	N/A	N/A
New Hampshire	Suitability	1/1/2015	Required	Required	N/A	N/A
New Jersey	Suitability	2/4/2013	Required	Required	N/A	N/A
New Mexico	Best Interest	10/1/2022	Required	Completed	4/1/2023	10/1/2022
North Carolina	N/A	N/A	N/A	N/A	N/A	N/A
North Dakota	Best Interest	1/1/2022	Required	Completed	7/1/2022	1/1/2022
Ohio	Best Interest	2/14/2021	Required	Completed	8/14/2021	2/14/2021
Oklahoma	Suitability	7/14/2010	Required	Required	N/A	N/A
Oregon	Suitability	8/1/2011	Required	Required	N/A	N/A
Pennsylvania	Best Interest	6/20/2022	Required	Completed	12/20/2022	6/20/2022
Rhode Island	Best Interest	4/1/2021	Required	Completed	9/30/2021	4/1/2021
South Carolina	Suitability	9/25/2011	Required	Required	N/A	N/A
South Dakota	Best Interest	1/1/2023	Required	Completed	7/1/2023	1/1/2023
Tennessee	Suitability	11/1/2015	Required	Required	N/A	N/A
Texas	Best Interest	9/1/2021	Required	Completed	12/31/2021	1/1/2022
					granted certain CE exem n the 1 hour or 4 hour Be	
Utah	Suitability	3/26/2012	Required	N/A	N/A	N/A
Vermont	N/A	N/A	N/A	N/A	N/A	N/A

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State	State follows Suitability, Best Interest, or N/A	Effective Date of Suitability or Best Interest Regulation (if applicable)	Product- Specific Training	Generic Annuity Suitability 4-hour Training (Required or previously completed)	Catch-up Best Interest 1-hour Training (Prerequisite: Generic annuity suitability 4- hour training)	OR 1 (State Best Interest 4-hour Fraining If generic annuity Suitability 4-hour Fraining has not Deen completed)
Virginia	Best Interest	9/1/2021	Required	Completed	3/1/2022		9/1/2021
Washington	Suitability	3/29/2012	Required	Required	N/A		N/A
West Virginia	Suitability	7/1/2011	Required	Required	N/A		N/A
Wisconsin	Best Interest	10/1/2022	Required	Completed	4/1/2023		10/1/2022
Wyoming	Suitability	9/26/2014	Required	Required	N/A		N/A