

ING Fixed Annuities: Notice 26

New Suitability Requirements for All Fixed Annuity Sales

The National Association of Insurance Commissioners (NAIC) revised the Senior Protection in Annuity Transactions Model to apply to sales to all consumers, not just senior consumers, and is advocating that all states adopt the amended version of the regulation. As a result, many states have either revised their regulation or adopted the regulation for sales to all consumers.

ING Fixed Annuities supports this position and has made the decision to review suitability for all of our fixed annuity sales. In order to do so, we will require the submission of additional customer information with each application in every state, in advance of state adoption of a suitability regulation. We feel strongly that this decision is in the best interests of the customer, agent and agency/firm, as well as our industry.

This new requirement simply formally solidifies what you have been practicing all along - proper due diligence with every sale.

Easy Suitability Profile Form

Beginning early in April, agents must perform a suitability analysis using our easy, one-page [Suitability Profile form \(#141438\)](#). Simply include the signed form with applications submitted to ING Fixed Annuities for all products except our Single Premium Immediate Annuity. This form will be used in all states and is attached for your convenience.

A review of the Suitability Profile will be performed during the normal processing of the new business application. In the event that a suitability review requires us to seek more information, a member of our Suitability Review Team will contact you with the appropriate questions.

Archive Your Written Suitability Documentation

Agents are required to retain written documentation supporting the suitability review for each customer for 10 years from the date of the recommended transaction, and be able to provide the documentation to the company upon request. Our Suitability Profile form is intended to capture the end result of your suitability analysis, and all materials used during the review are required to be part of your documentation archive.

ING USA is committed to creating and maintaining a culture of compliance, and continuing to put a strong emphasis on ethical business practices and fair dealing with our customers and distributors. Furthermore, we strive to make these processes easy for you and your clients.

Thank you for your continued business.

Contracts issued by ING USA Annuity and Life Insurance Company, 909 Locust Street, Des Moines, IA 50309.

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Call us for more information.
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